



ST HELENS
BOROUGH COUNCIL

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

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

PLAN ORDER

PO3401 – PO3500

SEPTEMBER 2020

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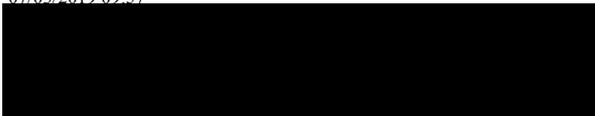
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PO3401



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



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 - LPA00

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

as a result of proposals for residential development / employment areas within the council local plan area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking at Railway Stations, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.

Yours faithfully



Diane Clarke AssocRTPI
Town Planning Technician LNW
Network Rail

PO3402



Eccleston Parish Council Response to Local Plan

Eccleston Parish Council

to:

planningpolicy@sthelens.gov.uk

11/03/2019 10:54



1 Attachment



ECCLESTON PARISH COUNCIL RESPONSE.pdf

Hi

Please find the response from Eccleston Parish Council to the Local Plan.

Regards

Janet Anderson

Clerk to Eccleston Parish Council

ECCLESTON PARISH COUNCIL

CLERK TO THE COUNCIL
Janet Anderson

6 Gorsey Croft
Eccleston Park
PRESCOT
L34 2RT

11 March 2019

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

① - LPA06
② - LPA04
③ - LPA05
④ - IOP
⑤ - LPA08
⑥ - Para 17.2 DTC

Please see below comments from Eccleston Parish Council regarding the St Helens Local Plan –
PLEASE ACKNOWLEDGE RECEIPT.

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

- LPA05
- LPA06
- LPA07
- LPA08

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

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

Section 5: If you consider the Local Plan is unsound, is it because:

- *Positively Prepared?* **No** – Plan does not consider Brownfield sites
- *Justified?* **No** – Plan based on flawed methodology
- *Effective?* **No** – Plan is not deliverable
- *Consistent with National Policy?* **No** – Plan does not comply with NPPF 2018

Section 6 and 7: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

And

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

LPA06 – Safeguarded Land

The Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The Housing Need assessment does not use Standard Methodology (SM) and therefore there is no case for "exceptional circumstances" for Green Belt land such as land at 8HS and 3HS to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Table 4.8 of the Local Plan outlines the requirements for Safeguarded Land for Housing beyond 2035. It estimates that 3096 homes to be needed, if a development restriction at Eccleston Park Golf Club related to highway issues, is lifted requiring 148 ha of land, 97% of which is Green Belt, including 8HS and 3HS Eccleston Park Golf Club site contributing approximately two thirds of these homes and Green Belt Land in the Eccleston ward

In addition, the Local Plan proposes 2955 new homes in Bold from the Allocated Housing Need beyond 2035 (Table 4.5). This equates to 6 years housing supply beyond 2035 using the 486-pa housing need proposed in the Local Plan. If a housing need of 298 pa beyond 2035 is adopted from LPSD Table 4.7 then the Allocated housing supply period extends to just short of 10 years. As such both of these analyses show that the 5 Year Housing Supply is met **without the need for safeguarding at all.**

Moreover, para 4.24.4 of the LPSD also acknowledges that small/windfall sites will further influence housing need beyond 2035 as well as a reduction on the annual housing need mentioned above. For instance, applying the small /windfall sites allowance of 93 homes pa will add 558 homes over 6 years and 930 homes over 10 years housing supply discussed in the previous paragraph. A further 2-3 years of housing need on top of the 6-10 years from Allocated Housing need provision.

It is therefore clear that without the Safeguarded sites, there will be a buffer totalling between 8, or as appears more likely given the reduced housing need, 13 years of housing land supply, more than enough to satisfy the 5 Year Housing Land Supply requirements. Put another way, between 53 and 87% of a 15-year plan period.

Modification:

The above demonstrates the safeguarding provisions in the LPSD are extraordinarily excessive and completely unnecessary. As such, safeguarding should be withdrawn completely from the LPSD proposals with all safeguarded Green Belt sites retained within their current Green Belt boundaries.

LPA08 – Infrastructure Delivery and Funding

A major concern that we have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it.

The IDP highlights quite well the projects currently underway in the Borough to try to alleviate the problems of today, however seems to lack any substance on what will be done to solve the issues of the future. The Local plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, on the A580 and at Windle Island (8HS) and on Portico Lane and Rainhill Road that surround 3HS (for example, a restriction on

housing development on the 3HS site has been imposed until traffic issues are investigated and resolved).

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

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best.

All the local Primary and Secondary Schools are all oversubscribed at present (for example Bleak Hill Primary School is to be extended subject to planning permission being granted, but, these expansion plans are to cater for existing demand and projected increase in primary school age population for Eccleston and Windle due to ongoing and recently completed residential developments in the local area). There will be more school places required if close to 2000 new homes are built on the 8HS and 3HS sites. The IDP does not deal with the long-term impacts of the education needs of new and existing communities.

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The IDP also acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided. Whiston and St.Helens Hospitals have long waiting lists above the national average. The A&E department at Whiston Hospital is also overstretched.

Taking all of the above in to account, 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.

Modification:

The IDP is neither clear nor defined and does not present solutions to current or future development issues. St Helens Council needs to provide a more detailed and comprehensive IDP to ensure that any such development proposals that take place in the future are both deliverable and sustainable. Without such a document, the LPSD cannot, and should not be considered sound at inspection.

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

Yes, I wish to participate at the oral examination.

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

Eccleston Parish Council is a statutory consultee on planning matters. We are also made up of councillors that represent the views and interests of Eccleston residents. Therefore, we feel that it necessary for our elected body to participate in the oral part of the examination.

ECCELESTON PARISH COUNCIL

PO3403

ELOOS6



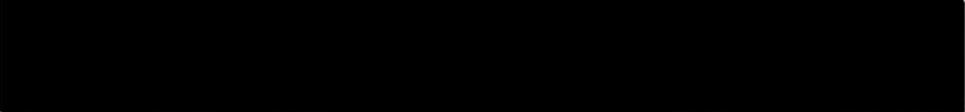
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

11/03/2019 13:18



1 Attachment



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

To whom it may concern,

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

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

Kind regards.

Dan Ingram

Senior Planner



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

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- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St Helens Council

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

EF0176

Ref: LPSD
(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [REDACTED] Date: 13/03/19

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

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

Yes (Via Email) No

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

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

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on Behalf of Andrew Cotton and Family

March 2019

Policy LPA08: Infrastructure Delivery and Funding

- 3.49 This Policy outlines why and how developer contributions will be sought, the hierarchy of developer contributions as well making provision for economic viability within development proposals and the impacts that developer contributions may have on this.
- 3.50 Our Client considers that the Policy accords with the thrust of national policy however concerns have been raised around Appendix 2, referred to within the supporting text of this policy.
- 3.51 Appendix 2 represents a non-exhaustive list of what the Council considers infrastructure to be. The Policy states that the Council will seek satisfactory provision of *all* forms of infrastructure that are required to serve the needs of the local community. There is no evidence supporting the contents of Appendix 2, nor is there any formula provided as to how the contribution for each will be calculated. Appendix 2 would appear to represent a wish-list for the Council rather than a factual list of what is actually required.
- 3.52 Our Client considers that greater clarity, and evidence on what is actually required and the contributions this is likely to entail should be included within the new Local Plan. Our Client recognises that the Policy makes reference to a Developer Contributions Supplementary Planning Document, which although may serve to alleviate some of these concerns does not provide any certainty as no timescales for the production of this document have been provided.
- 3.53 The Policy also makes reference to the latest version of the St Helens Borough Infrastructure Delivery Plan (IDP), dated December 2018. The IDP intends to set out what level of new or improved infrastructure will be required to deliver the growth expected through the New Local Plan.
- 3.54 The IDP outlines the projects that will be required within the Borough throughout the Plan Period, including outlining estimated costs of these projects. The IDP however does not provide clarity on the likely costs to developers resulting from these projects.

- 3.55 Our Client is concerned that whilst the IDP contains a comprehensive list of projects required to deliver the growth of the Borough, it does not contain details of site-specific requirements. Particularly in the case of the sites allocated for development, one would expect specific requirements to be outlined with details of the allocation. The IDP fails to do this. Whilst the Site Profile in Appendix 5 provides some information about what may be required this is vague and does not provide any clarity or certainty going forward. Our Client considers that greater, site-specific detail around developer contributions is required in order for them to be able to endorse this Policy.

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Policy LPA09: Green Infrastructure

- 3.56 This Policy outlines what the Green Infrastructure network is and why it is of value to the Borough. The Policy details how the Council will work with other organisations to improve and enhance the Green Infrastructure network noting that development proposals on strategic housing and employment sites incorporate holistic Green Infrastructure Plans. The Policy also outlines that developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites. Furthermore, the Policy states that development that would contribute to, or enhance the function of the Green Infrastructure network will be encouraged.
- 3.57 Our Client is supportive of this Policy and notes the encouragement given to development proposals which will enhance the Green Infrastructure network.
- 3.58 Our Client's land interest, with proposed allocation 4HA and within the area covered by the adopted Bold Forest Area Action Plan and provides an excellent opportunity for Green Infrastructure enhancements to an area which is largely grassland presently. This accords with the vision and objectives of the Council and will facilitate a high-end development of aspirational homes, something of which there is currently a deficit within the Borough.
- 3.59 In addition, our Client is satisfied that the Policy does not conflict with the adopted Bold Forest Area Action Plan which, with regard to meeting the strategic land use needs of the Borough, requires strategic developments to contribute positively to the development of the Bold Forest Park, not result in the loss of any critical infrastructure elements and enhance connectivity between urban areas and the forest park (in the case of housing and employment developments).

14

- Our Client has numerous concerns around Policy LPA02 relating to the definition of St Helens Core Area, the use of Developer Contributions and the identification of Bold Forest Garden Suburb as a key settlement in its own right. Our Client is concerned that the overall importance of Bold Forest Garden Suburb has been understated throughout the Plan; (6)
- In addition to the above there are concerns that the Council are seeking to allocate considerably more employment land that studies suggest is required. Whilst there is no objection to this in itself the Council should increase its housing allocations to meet the population growth this would generate. (10)
- Our Client is concerned that whilst being the key housing allocation, and the largest by over 2000 dwellings, there is no site-specific policy relating to its delivery and Council expectations with regard to development parameters or planning obligations, nor is there mention of a subsequent Supplementary Planning Document which may serve to address such matters; (15)
- The Council should revisit the housing delivery projections outlined under Policy LPA05. Presently, our Client considers that the delivery of 480 dwellings out of an allocation of over 2500 during the next 16 years is unrealistically low and unambitious. Given the status of the allocation and its importance within the Plan, the Council should be encouraging the delivery of the Site as soon as possible in order to meet the needs of the Borough; (13)
- Our Client is concerned that there is a lack of evidence relating to infrastructure requirements and considers that the list of what the Council deems to be required is little more than a wish-list, with little evidence provided to support it. With regard to strategic land allocations the Council should list detailed, site-specific infrastructure requirements within the Plan; and (13)
- Our Client remains concerned that the New Local Plan indicates a new Greenway Route running through their land interest but provides no detail on what this entails, who will provide it and when, and how will it be funded. The Council should provide greater clarity on this within the Plan. (7)

5.4 Our Client welcomes the opportunity to again provide comments on the New Local Plan and is encouraged by its progress to date. Notwithstanding this there remain some areas

PO3404



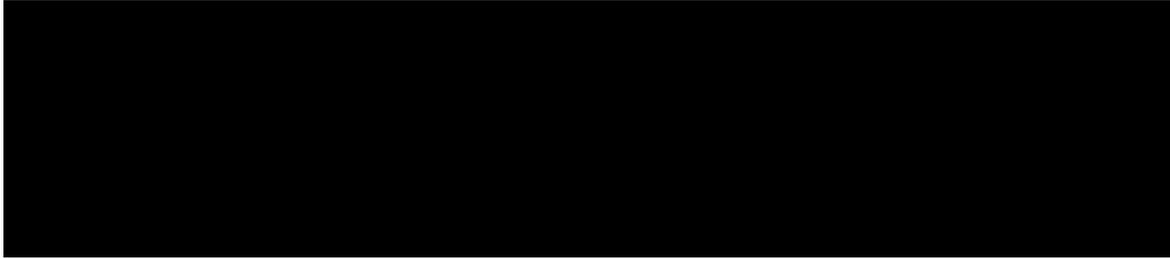
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

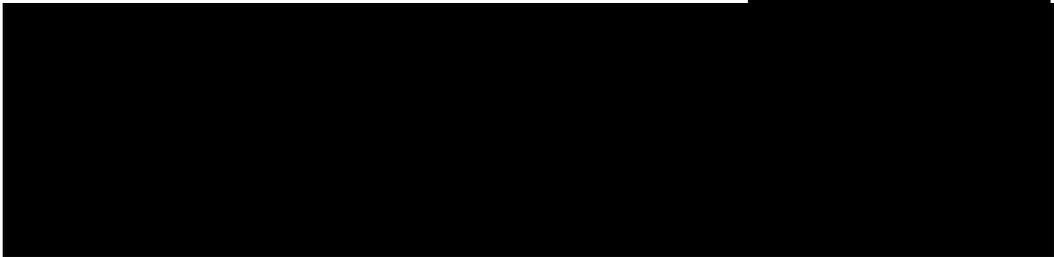
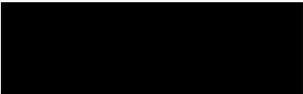
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44

3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.

3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45

3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46

Policy LPA08 – Infrastructure Delivery and Funding

3.47 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified because it does not make sufficiently clear the circumstances in which certain contributions will be sought. 47

3.48 In the first instance, at Part 1 of the policy it is unclear what is meant by 'all forms of infrastructure' that are required to serve the needs of the local community. The Local Plan must be sure to ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities. 48

3.49 Clearly there is a mechanism for the pooling of contributions for wider infrastructure delivery through CIL charging but, we understand, this is not something that the

PO3405



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



5 Attachments



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



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



Weathercock Hill Farm_Ecological Statement(1.1).pdf



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

Dear Sir/Madam

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

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

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

Kind regards
Sean

Sean McBride
Persimmon Homes (North West)



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



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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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

Representations submitted on behalf of Persimmon Homes North West

March 2019



development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

Policy LPA06: Safeguarded Land

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

Policy LPA06 Extent of the Green Belt and Safeguarded Land

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

Policy LPA08 Infrastructure Delivery and Funding

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

Policy LPC01: Housing Mix

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24

PO3406



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



5 Attachments



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

Representations submitted on behalf of Persimmon Homes North West

March 2019



11.7 The Company considers that the Council should provide sufficient evidence that the introduction of the optional standards are required; and further that their introduction would not hinder the viability of the Local Plan.

26

Policy LPC02: Affordable Housing

12.1 Whilst the Company is supportive of the delivery of affordable homes to meet identified needs within St Helens, it is important that the seeking of planning obligations, including affordable housing, does not hinder the ability of sites to be delivered, PPG being clear that Council's should ensure that seeking such obligations do not threaten the viability of the sites and scale of development identified in the development plan (Ref: 23b-002b20140306) and should be flexible in their requirements where requiring affordable housing(Ref: 23b-006b-20140306).

27

12.2 The Council's Economic Viability Assessment identifies that emerging greenfield housing allocations are viable at 30 dph with 30% affordable housing, however Table 6.10 identifying that 'generic' greenfield sites are largely unviable when applying the same density and affordable housing requirement.

12.3 Given Table 4.6 of the Local Plan identifies that a significant proportion of the Council's housing requirement is to be met on other sites identified in the SHLAA - of which a proportion will be greenfield sites within Zone 2 – a 30% affordable housing requirement will have significant implications on viability of these sites and therefore the ability of the Council to achieve its housing requirement.

28

12.4 We would encourage the Council to retain an element of flexibility in applying its affordable housing requirement in order to ensure Local Plan housing sites can be delivered viably and the scale of development proposed in the Plan is not threatened.

12.5 The Company consider it important that the Council also demonstrate flexibility in renegotiating the tenure of affordable housing, should prior agreed forms of affordable housing be unattractive to Registered Providers.

12.6 The Ministerial Statement of 9th November 2015 urges planning authorities to *'respond constructively, rapidly and positively to requests for such renegotiations and to take a pragmatic and proportionate approach to viability. Where it is simply proposed that the tenure mix is adjusted, with the overall affordable housing contribution remaining the same, it is our view that this is unlikely to justify reopening viability by either side.'*

12.7 The Ministerial Statement further notes that should there be a need to reduce the overall amount of affordable housing, local authorities should seek the minimum amount of viability information necessary, also encouraging flexible arrangements in the original agreement (for example through cascade mechanisms) so that it allows the delivery of alternative forms of affordable housing if necessary.

12.8 Policy LPA08 sets out that developers would be expected to contribute, where appropriate to the provision of on-site or directly ancillary infrastructure to support new development; and the provision of strategic infrastructure to support local communities and Borough wide development as identified in the Infrastructure Delivery Plan.

12.9 The Company accepts the Council's approach to obligations in order to make a development acceptable in planning terms, although would wish to highlight para 173 of the Framework, which is clear that *'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking and therefore the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'*. Planning Practice Guidance is clear that where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations' (Ref: 10-019-20140306).

29

12.10 Moreover, the Framework is clear that planning obligations should only be sought where they meet all of a number of tests, namely that they are necessary to make the development acceptable in planning terms; directly related to the development and fairly and reasonably related in scale and kind to the development.

12.11 On sites of challenging viability, it is clear that a balance has to be found between the need for scheme delivery in the face of challenging viability and the requirement for planning obligations.

29

Summary

13.1 The Company is supportive of the preparation of a Local Plan for St Helens which seeks to support the delivery of new homes to meet identified housing needs. Our key comments concerning this Submission Draft Local Plan can be summarised as follows:-

- Whilst generally supportive of the Council's spatial vision; the Company considers the Council's prioritising of previously developed sites to be contrary to those policies contained within the Framework, which whilst seeking to encourage brownfield development does not prioritise their development over greenfield sites, instead supporting a presumption in favour of sustainable development and seeking to significantly boost the supply of new homes.
- The Company is concerned at the significant reduction in the Local Plan housing requirement from 570 dpa as currently adopted, and also proposed in the Preferred Options Local Plan. Whilst acknowledging that the proposed requirement has been defined using the standard method, the Framework is clear that this figure should be used as a minimum. Reducing the housing requirement does not accord with Government objectives to 'significantly boost' the supply of housing and the target to deliver 300,000 new homes per annum across the UK.
- The Company would stress that the delivery of the Council's housing requirement should not be threatened by overly onerous policy obligations, including the requirement to provide a particularly product type or optional standards which would have significant implications on scheme viability. Should the Council insist on implementing such policies, including optional standards, planning practice guidance is clear that it should provide evidence demonstrating a need for the requirement, and have regard to the overall impact on viability. Where scheme viability is demonstrated to be impacted, the Council should provide flexibility in the implementation of the policy.

PO3407



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



1 Attachment



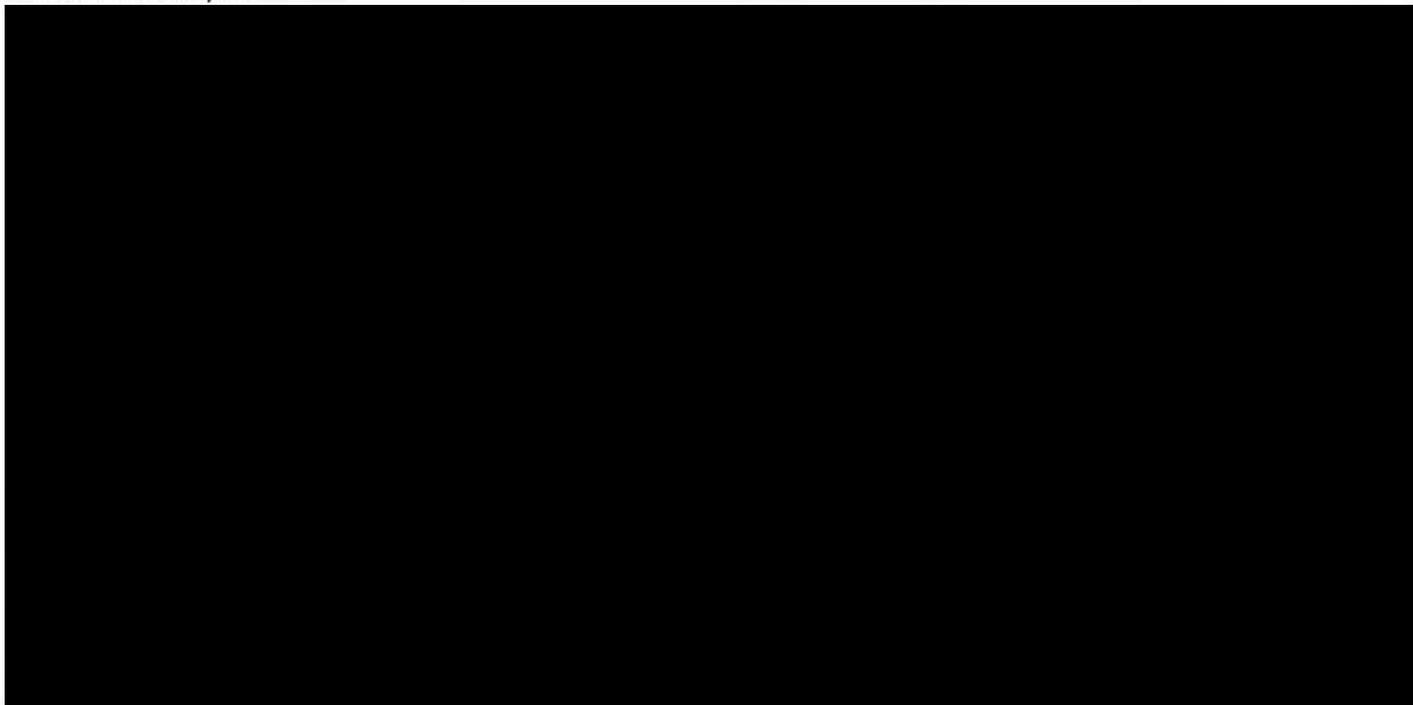
OBJECTION LETTER.docx

Dear Sirs

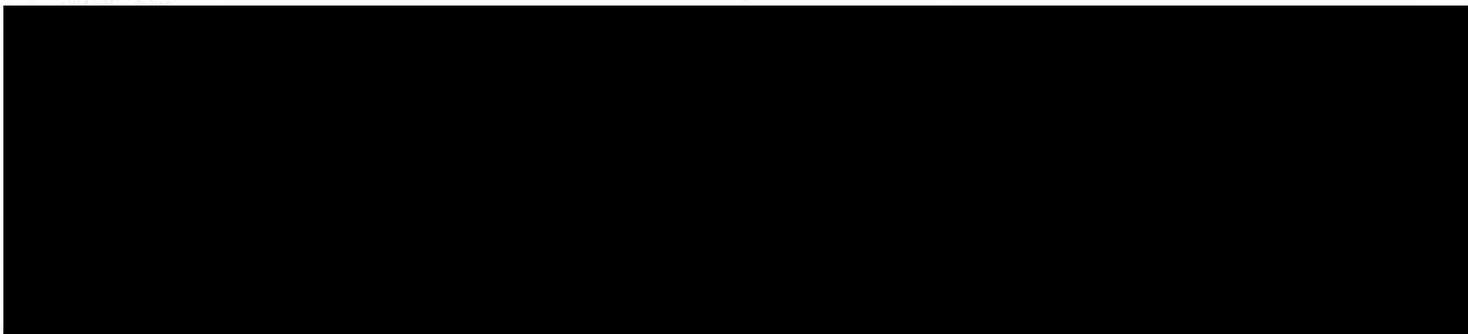
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

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

PO3408



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planningpolicy
13/03/2019 13:24



1 Attachment



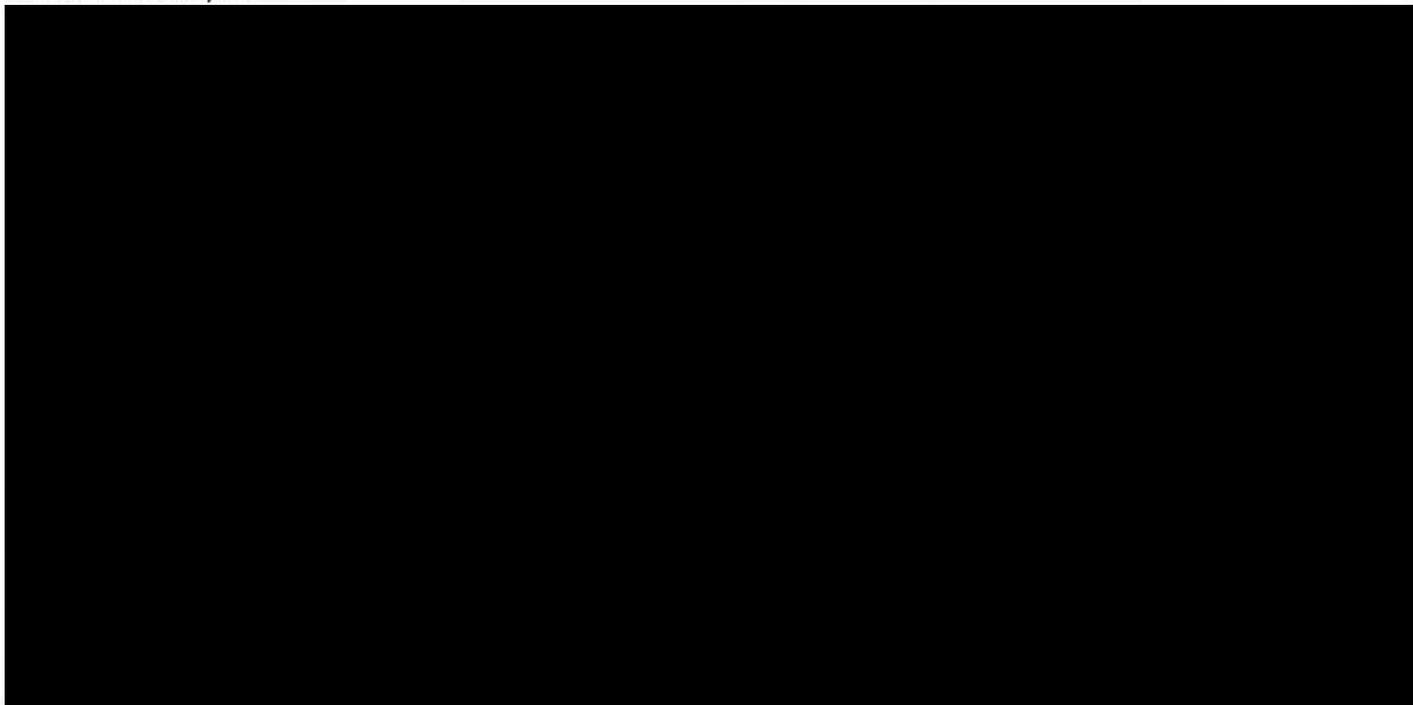
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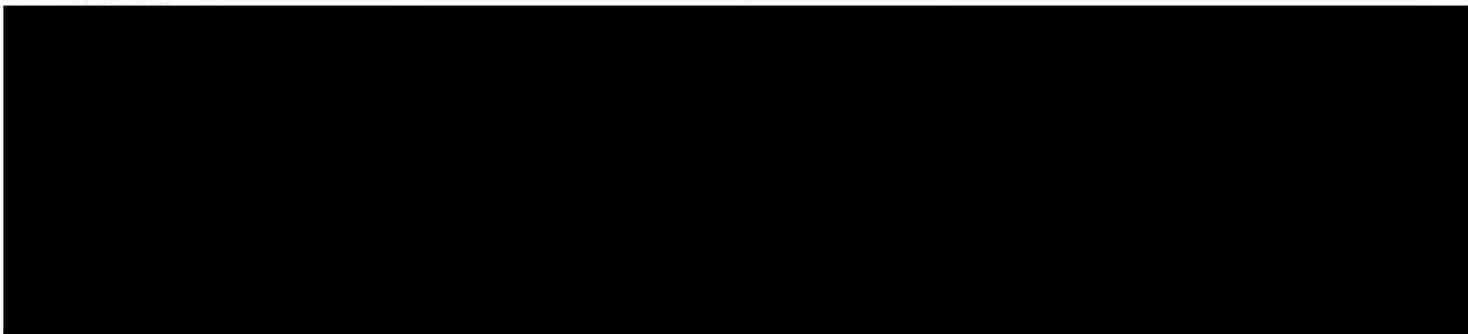
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PO3409



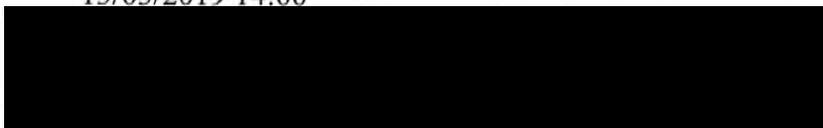
OBJECTION LETTER

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

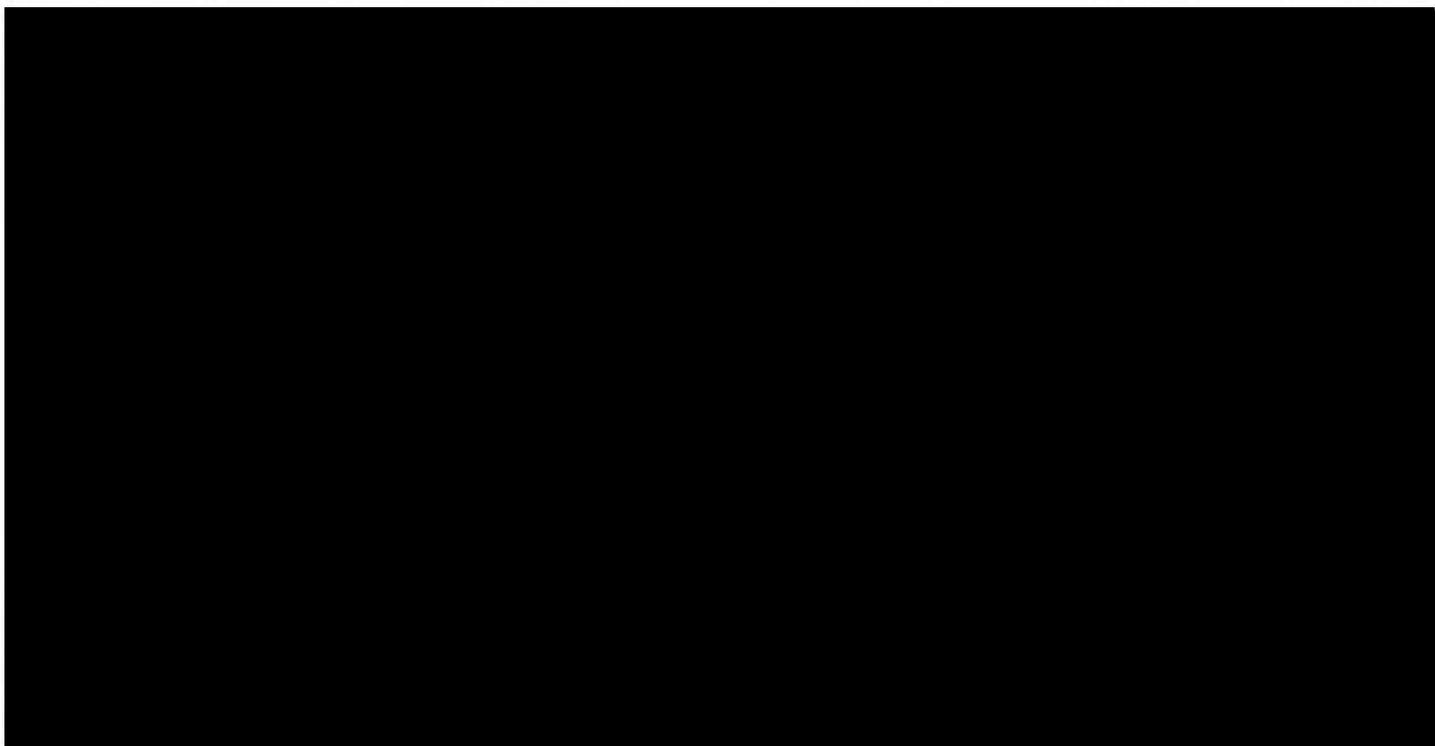
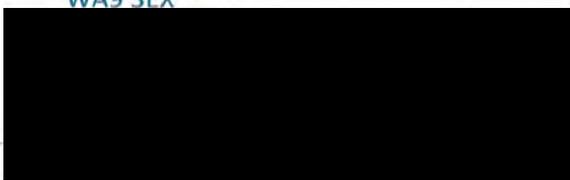
Lancots Lane

Sutton Oak

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Merseyside

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Catherine Hanwright
56A, The Oaks,
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WA10 5LD

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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

Catherine Hanwright

PO3410



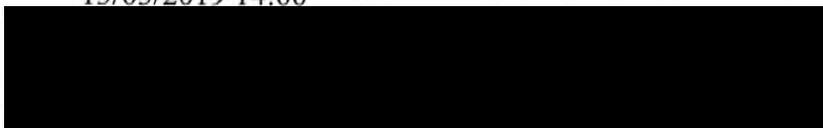
OBJECTION LETTER

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

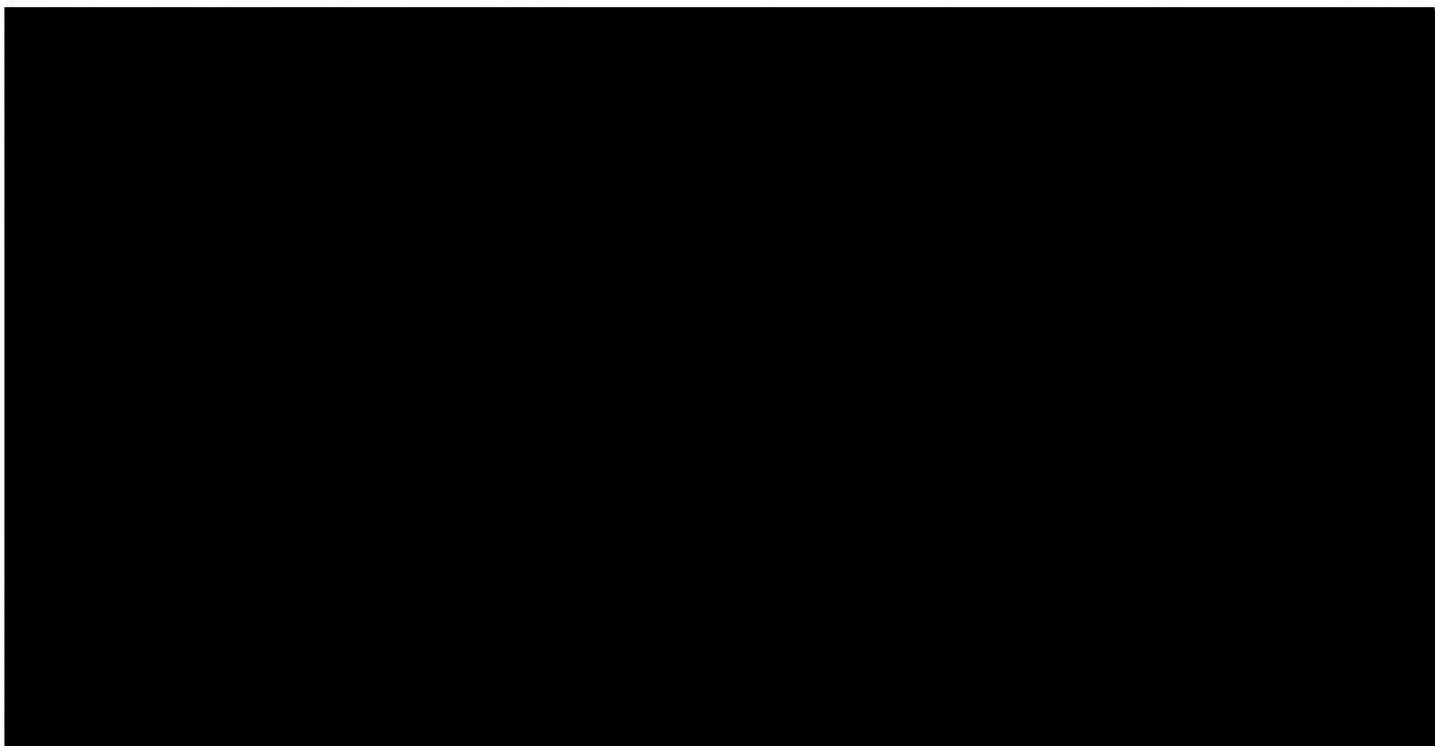
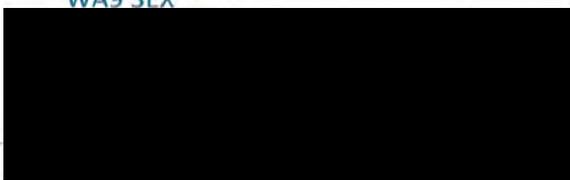
Lancots Lane

Sutton Oak

St Helens

Merseyside

WA9 3EX



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

Reference: St Helens Local Plan

Dear Sirs,

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

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016, 383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan. 01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower density of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing. 02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period. 05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound. 06

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

08

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

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

09

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

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.

10

11

In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Catherine Hanwright

PO3411



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

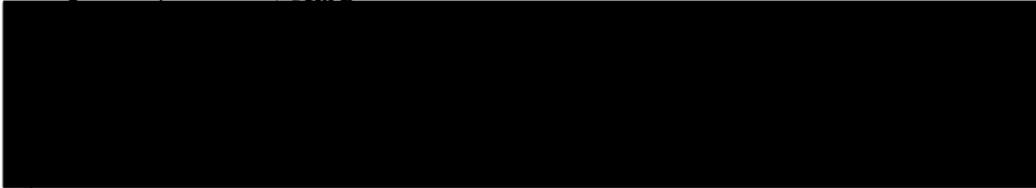
PO3412



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	✓	Paragraph / diagram / table	✓	Policies Map	✓	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?	✓
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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

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

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

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

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

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

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

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

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

PO3413

ELO210



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation - submitted on behalf of BXB (Cowley Hill) Ltd
Gemma Williams

to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:38

- ① - APPENDIX
- ② - LPA08
- ③ - LPC02
- ④ - LPA05.1



2 Attachments



lpsd-representation-form.doc 13 03 19.pdf c.pdf pt 12 03 19 sh GW.pdf

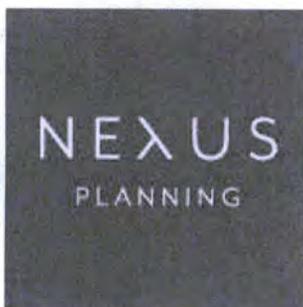
Please see attached a completed Representation Form and letter of explanation submitted on behalf of BXB (Cowley Hill) Ltd.

Kind regards

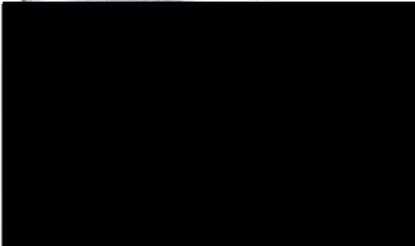
Gemma Williams
Administrator



Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ





St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

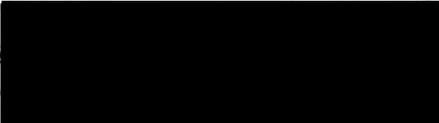
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Gary	First name: Peter
Last Name: Goodman	Last Name: Tooher
Organisation/company: BXB (Cowley Hill) Ltd	Organisation/company: Nexus Planning
Address:	Address: Eastgate, Castle Street, Manchester
Postcode:	Postcode: M3 4LZ



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

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

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

Yes (Via Email)

No

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LPA05		Appendix 5, bullet points 2 (Green Infrastructure) and 5(B1 uses)							
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

BXB (Cowley Hill) Ltd strongly supports the allocation of Cowley Hill site for residential led development. BXB (Cowley Hill) Ltd supports the Council in progressing the Local Plan. The Local Plan preparation process and the requirements of the site however necessitate BXB (Cowley Hill) Ltd commenting on the draft Local Plan to the effect that two specific elements of

Appendix 5 as they relate to Cowley Hill are unsound. Please refer to the attached letter (Nexus Planning, 13.03.2019)

Please continue on a separate sheet if necessary

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

Please refer to the attached letter (Nexus Planning 13.03.19)

Please continue on a separate sheet if necessary

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

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

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

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

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

The strategic importance of bringing forward the Cowley Hill site and BXB (Cowley Hill) Ltd's key role.

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

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



NEXUS
PLANNING

Paul Sanderson
Strategic Director of Place Services
St Helens Council
Local Plan
Town Hall, Victoria Square
St Helens, Merseyside
WA10 1HP

Manchester
Eastgate
2 Castle Street
Castlefield
Manchester M3 4LZ

nexusplanning.co.uk

E: planningpolicy@sthelens.gov.uk

13th March 2019

Dear Sir

The New St Helens Borough Council Local Plan 2020 – 2035

Submission Draft – ‘Regulation 19’ consultation

Representation submitted on behalf of BXB (Cowley Hill) Limited in relation to Cowley Hill, St Helens (6HA)

Thank you for the opportunity to comment on the submission draft of the New Local Plan. This representation is submitted on behalf of BXB (Cowley Hill) Ltd by Nexus Planning. ✓

A completed Representation Form is attached to this representation. ✓

BXB Ltd is a specialist land developer focussing on bringing forward brownfield, previously developed sites, for all types of development, including residential. ✓

BXB (Cowley Hill) Ltd has a land and promotion agreement with Pilkington plc in relation to the surplus land at Cowley Hill, Strategic Housing Site ref 6HA in the Draft Local Plan. BXB (Cowley Hill) Ltd intend to submit an application for residential-led development on the Cowley Hill site in 2019. Initial reclamation work on the site is due to commence in early 2020 as ‘permitted development’ demolition work. Subject to the appropriate approvals, this will be followed by further grounds works, site preparation, engineering works and reclamation and development later in 2020. ✓

London

Birmingham

Manchester

Thames Valley

of the town centre. For those who need to drive, the A580 East Lancs Road is accessible to the north of the site via Washway Lane / City Road, without the need to travel through existing residential areas.

Deliverable

The site is deliverable for residential led development. BXB (Cowley Hill) Ltd has undertaken an initial technical assessment of the site. Whilst inevitably there are a number of matters to be addressed as a consequence of the site's industrial history, BXB Ltd is confident that there are no constraints that would prevent residential development on the site. This technical work has been identified a net developable area of around 35 hectares.

BXB (Cowley Hill) Ltd has discussed the site with the Local Planning Authority and intend to submit a planning application for residential led development in 2019. This will be supported by a comprehensive masterplanning approach and a phasing strategy. The application will be prepared with the benefit of stakeholder and local community consultation. As noted earlier, and subject to the necessary approvals, BXB (Cowley Hill) Ltd expect development to start on the site in 2020, following phased site preparation, engineering and remediation.

Whilst the NPPF and extant development plan provide a very positive basis upon which an application on the site can be progressed in 2019 ahead of adoption of the new Local Plan, BXB Ltd are wholly supportive in principle of the proposed allocation of the site in the Submission Draft Local Plan. However, as noted above, the draft Local Plan is considered 'unsound' on a number of specific points.

Draft Policy LPA05.1: identifies 'Strategic Housing Sites' and refers to:

'6HA: Land at Cowley Street, Cowley Hill, Town Centre'

The policy notes that any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan.

Detailed development proposals within a Strategic Housing Site are required to comply with Policy LPA08. Policy LPA08 deals with Infrastructure Delivery and Funding and developer contributions secured by legal agreement or a tariff based system such as the Community Infrastructure Levy. The policy notes that development contributions will be considered in the context of the economic viability of new development. Consideration will be given to economic viability evidence to determine the ability of the development scheme to support the required level of contributions.

A similar approach is taken to the provision of Affordable Housing in Policy LPC02, which acknowledges that provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development. The policy notes that affordable housing requirements can be relaxed where it is fully justified by an independent site-specific viability appraisal and where a reduced affordable housing provision is outweighed by the other benefits of the development.

BXB (Cowley Hill) Ltd welcome this clear and pragmatic approach. As noted earlier, BXB Ltd are confident that the Cowley Hill site can come forward for residential development. However, bringing the site forward will require significant investment in site remediation and infrastructure, amongst other things. The inevitable, additional costs of viably developing a large scale, brownfield site will need to be reflected in the extent of developer contributions and affordable housing provision, based on a robust viability appraisal. The significant additional investment in infrastructure and other works in bringing forward brownfield sites such as Cowley Hill

620219

should be explicitly reflected in LPA08 and LPC02. Similarly LPC02 should be reflected to take into account the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice, in an innovative way. (2) & (3)

Appendix 5

The masterplans for each Strategic Housing Site are to address the indicative requirements set out in Appendix 5.

Appendix 5 to the Draft Plan identifies the Cowley Hill site as having a 'notional' capacity of 816 units. (1)

The site extends to approximately 50 hectares and initial capacity testing undertaken by BXB (Cowley Hill) Ltd confirms that the site has a net developable area of 35 hectares and a capacity of around 1,000 – 1,200 new homes, subject to detailed masterplanning and housing mix.

Reflecting Policy LPA05.1, Appendix 5 identifies a series of 'indicative requirements' that are to be 'addressed'. These as drafted, are as follows:

- *Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).*
- *A Green corridor, incorporating the LWS47*, should be provided from the north around the eastern boundary of the site linking the green spaces and habitats along Rainford Brook and the wider greenway network.*
- *Measures to 'slow the flow' and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 'flood Risk and Water Management'.*
- *The development should include appropriate measures to attenuate noise from the adjacent employment use(s).* ✓
- *The development area allows for the inclusion of 4ha of B1 employment uses (if this is not implemented this will make more land available for housing).*
- *Any development should address any contamination issues and/or other geotechnical issues affecting the site.*
- *Related to the above, site levels should be carefully considered in relation to the site layout and surrounding area.*
- *The design and layout of the development should provide for a range of house types in character areas.*
- *Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.*

*Local Wildlife Site 47

BXB (Cowley Hill) Ltd support the master planning approach to Strategic Sites including Cowley Hill and, in large part, the requirements proposed for the site. The inherent flexibility in how the 'indicative requirements' are addressed through a masterplanning process which, in the case of Cowley Hill, will inevitably have to balance a range of design, ground conditions, infrastructure, environmental and viability issues is welcomed. (4)

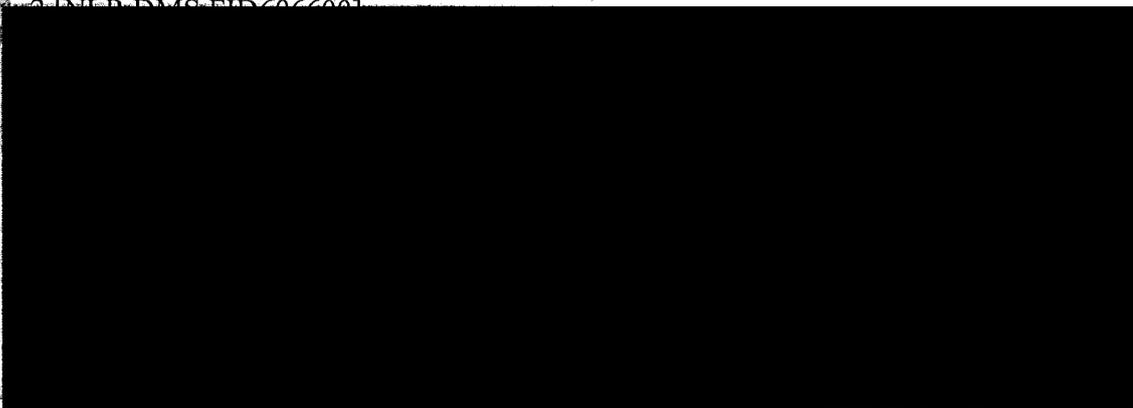
However for the sake of clarity, and given the scale of the site, the need to address its' industrial legacy, as well as its future relationship with remaining industrial uses, access and other considerations, it is considered that the albeit indicative requirements set out in Appendix 5, should be amended. There indicative requirements (1)

PO3414

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,

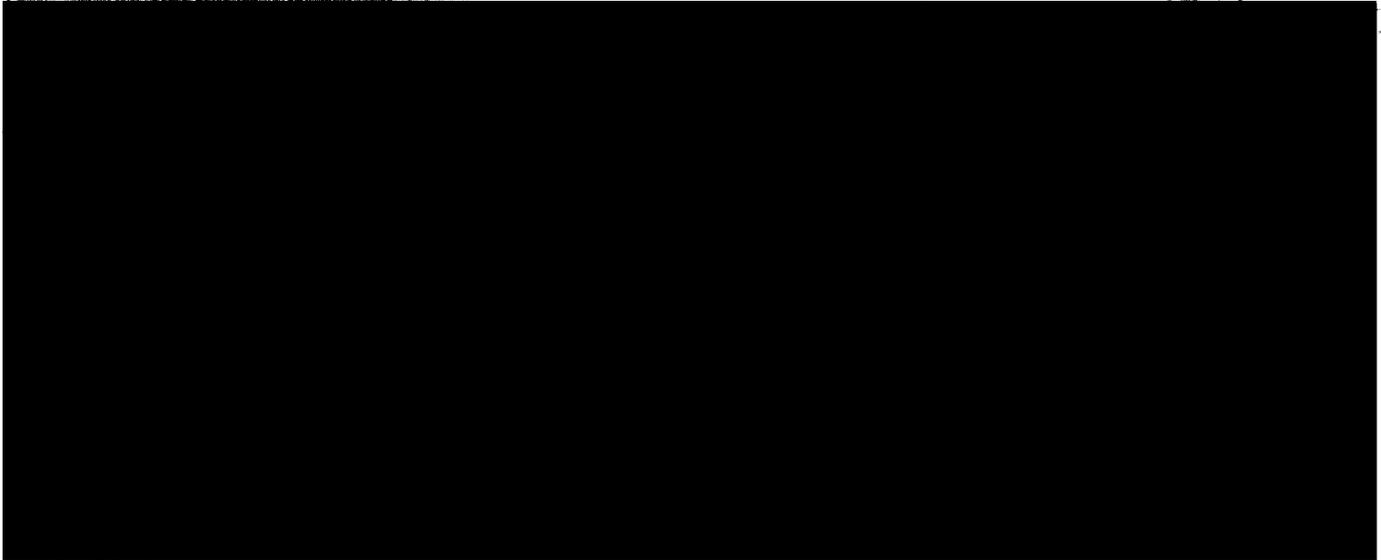
Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,
Melissa

- | | | | |
|-----------|---------|---------|---------|
| ⑭ LPC01/2 | ⑰ LPC02 | ⑳ LPC13 | ㉔ LPD01 |
| ⑮ LPC01/3 | ⑱ LPC05 | ㉕ LPD01 | ㉗ LPD02 |
| ⑯ LPC01/5 | ㉒ LPC10 | ㉖ LPD01 | ㉘ LPD03 |
| ⑰ LPC01/6 | ㉓ LPC12 | ㉙ LPD01 | ㉚ LPD07 |
| | | ㉛ LPD01 | ㉜ 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

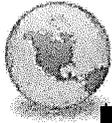
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

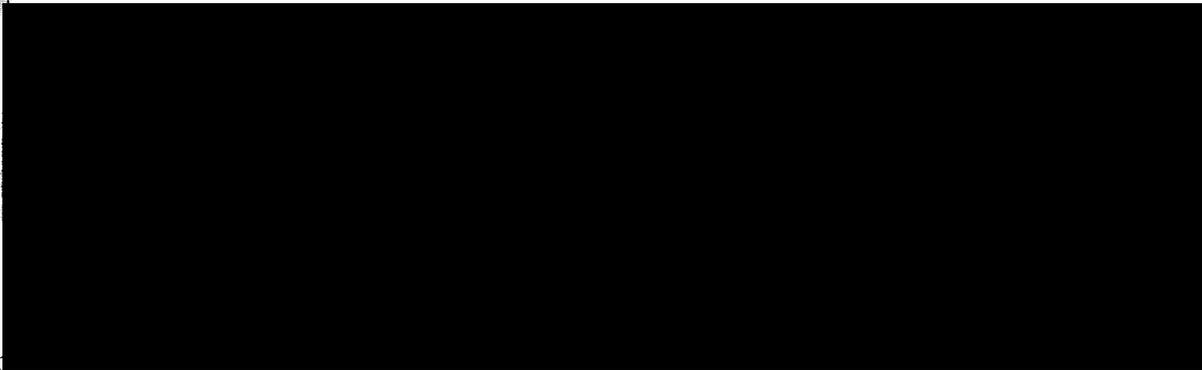
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Think of the environment. Please avoid printing this email unnecessarily.



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 4WJ

lichfields.uk

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

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

10.0 **Policy LPA08: Infrastructure Delivery and Funding**

Introduction

10.1 Policy LPA08 seeks to establish a framework for the provision of necessary infrastructure and developer contributions through Section 106 obligations or CIL.

Consideration of Policy

10.2 TW broadly supports Policy LPA08 and accepts that financial contributions may be required to mitigate the impact of development proposals on infrastructure and services. However, TW notes that the requirements for any financial obligations should still enable the development to be deliverable in accordance with the Framework.

10.3 With reference to Policy LPA08, TW considers that any requirement for financial contributions must be; fully justified and based on credible and robust evidence base which identifies an actual need for the facilities; reasonable in terms of the relationship to the development; and, not unduly restrictive so as to affect the viability and deliverability of development. Furthermore, TW notes that any financial contributions sought should meet the tests as set out in the CIL Regulations [§122] and the Framework¹¹:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and,
- Fairly and reasonably related in scale and kind to the development.

10.4 TW requests that the Policy is updated to make reference to the aforementioned tests and that it is made clear that any financial contributions required by the Council will be considered in this context.

10.5 In relation to Part 2b and §4.30.6, TW notes that as the Council has no proposals to introduce CIL, accordingly it will be confined to pooled contributions from up to 5 separate planning obligations for any item of infrastructure that is not locally intended to be funded by the levy. Furthermore, should the Council be minded to adopt a CIL they should ensure this does not result in developments being subject to double charging.

10.6 TW has undertaken a detailed review of the Council's Viability Assessment (Appendix 4) and considers that there are a number of areas which require additional work and justification prior to the examination of the plan. Taylor Wimpey supports the Council's acknowledgement that developer contributions can impact on the viability of schemes (Part 5) and site-specific development appraisals can be submitted during the determination of planning applications. However, Taylor Wimpey consider that policy threshold should be set taking a conservative stance to viability and submitting site specific assessment should be the exception rather than the rule.

Tests of Soundness

10.7 TW considered Policy LPA08 to be sound provided a more robust and fully justified Viability Assessment is prepared to justify the requirements set out in the Local Plan.

¹¹ The Framework - §56

PO3416



St. Helens Council

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

Ref: LPSD
(For official use only)

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

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Part B – Your Representation(s).

- ① LPA02
- ② PARA 1.7.2 DEC
- ③ LPA04
- ④ GENERAL
- ⑤ IDP
- ⑥ LPA08

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:
First Name: <i>SRENDA</i>	First name:
Last Name: <i>WORRALL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>10 CALDERHURST DRIVE WINDLE</i>	Address:
Postcode: <i>WA10 6ED</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: *28/2/2019*

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

Please tick as appropriate

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

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

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

see attached sheet

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.

N
/ A

Please continue on a separate sheet if necessary

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

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

<input 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

N
/ A

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

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

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines and are extremely aspirational, ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

The Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meetings stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the following matters:

Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

Traffic Issues and Duty to Cooperate

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. The plans also show a planned route for walkers and cyclist along Calderhurst Road to Bleak Hill road where there is a traffic problem with school parking. I fear that these plans will be altered to allow access/egress for the new home residents.

Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

5

As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

WEST MANCHESTER
LP?

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **"Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"**

1

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"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 b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

1

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity and to visit local supermarkets.

6

Taking into account these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure.

Yours sincerely



Mrs B Worrall
10 Calderhurst Drive
St Helens WA10 6ED

PO3417

Ref: LPSD
(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.

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Part B - Your Representation(s)

- ① LPA02
- ② LPA04
- ③ GENERAL
- ④ IDP
- ⑤ LPA08

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>EVERYN</u>	First name: _____
Last Name: <u>DODD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 NICOLL ROAD</u> <u>ECCLESTON</u> <u>ST HELENS LANCES WA10 5LW</u>	Address: _____
Postcode: _____	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 12.3.2019

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

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- Yes (via email) No

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:

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>DOES NOT COMPLY WITH NPPF (2018) GUIDELINES DOES NOT EXPLAIN HOW THE ROAD INFRASTRUCTURE PROBLEMS WILL BE OVERCOME ALL FORECASTS ARE HIGHLY ASPIRATIONAL AND NOT EVIDENCED BY HARD FACTS — SEE ATTACHED SHEET FOR MORE DETAILS</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.

CLARIFICATION IS NEEDED ON THE NPPF METHOD OF CALCULATING HOUSING NUMBERS (2016 OR 2018) UNTIL THIS HIGHLY ASPIRATIONAL ^{METHOD} IS MODIFIED ON A REGIONAL AND NOT NATIONAL BASIS - NO FURTHER PROGRESS SHOULD BE MADE.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

Dear Sirs

This continuation sheet is further to my Representation/Comment form.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines, are extremely aspirational, and ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

①

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

②

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

③

Traffic Issues and Duty to Cooperate: St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private car to the new business estates, mainly along the A580 as there is no existing public transport nor any published plans for the future. The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

①

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

Windle Island: The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

④

? WEST
LANCS LP?

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **“Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”**

] ①

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

“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 b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services.”

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

] ①

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

] ③

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

—
SUGGEST
MOSS!

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours sincerely

[Redacted signature]

Mrs E Dodd

24 Nicoll Rd, Eccleston St Helens

PO3418



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)

- ① PAR 1.7-2
- ② LPA02
- ③ LPA04
- ④ CRENER
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

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>IRENE</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK CREES</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:

Date: 13.3.2019

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

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

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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.**

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.

NO DEVELOPMENT ON GREENBELT UNTIL ALL BROWNFIELD SITES ARE USED - NO DEVELOPMENT ON GREENBELT (BHS) UNTIL ROAD INFRASTRUCTURE FIXED -
SEE ATTACHED SHEET

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

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

Please keep a copy for future reference.

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated. ✓

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons: ✓

I believe that the Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities. ①

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy. ②

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development. ②

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere. ①

Duty to Cooperate.

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government). ③

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved. WEST LANC'S L.P.

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future. ②

Windle Island

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This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe" (2)

This is echoed in the Council's own proposed submission draft (LPO1 sec 4.25) which includes the following:

"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 b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services." ✓

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure. (2)

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable. (7)

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring. SUGGESTING NOOS!

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection. ✓

Yours Sincerely

[Redacted Signature]

Mrs I M Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

PO3419

Ref: LPSD

(For official use only)



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This form has two parts;

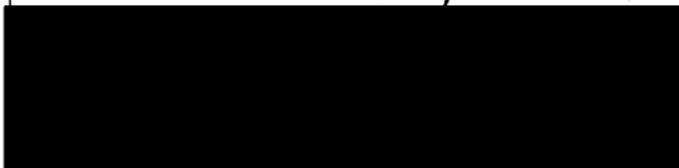
Part A - Personal Details

Part B - Your Representation(s)

- ① PARA 1.7.2 DEC
- ② LPA02
- ③ LPA04
- ④ GENERAL
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK PASS</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 13-3-2019

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**Now please complete PART B of this form,
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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input 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

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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"/>

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>Not Sound - SEE ATTACHED</p>

Please continue on a separate sheet if necessary

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NO BUILDING SHOULD TAKE PLACE UNTIL
HIGHWAY INFRASTRUCTURE IS IN PLACE —

SEE ATTACHED

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✓	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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Dear Sirs

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I believe that the Plan is not legally compliant because:

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0

2

1

3

WEST
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L.P.?

2

Windle Island

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6

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

2

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"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 b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

2

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

7

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land , providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

Subverts
road ?

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours Sincerely



D A Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

PO3420

13 MAR 2019



St. Helens
Council

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

Ref: LPSD

(For official use only)

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: Stephen	First name:
Last Name: Brine	Last Name:
Organisation/company:	Organisation/company:
Address: Friars Cottage Houghtons Lane, Eccleston, St Helens Postcode: WA10 5QE	Address: Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 12-3-19.

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

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

Yes (Via Email) No

Please note - 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	01, 02, 03, 04, 05, 06, 08	Paragraph	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment
		Diagram		Habitats Regulation Assessment
		Table		
Other documents (please name document and relevant part/section)				

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

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
Please see attached 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 attached 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 you have already indicated that you are seeking a modification, do you consider it necessary to participate at the oral part of the examination? (This is not a compulsory question)

<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.

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.**

STEPHEN BRINE
FLIMS COTTAGE
HOLGATE LANE
ECCLESTON
ST. HELENS, WAT0 5QE

PART B -YOUR REPRESENTATION

I firmly believe that the Submission Draft fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF)

I believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. The Submission Draft is not positively prepared, justified, effective or consistent with National Planning Policy.

Please note that I am in agreement to the representations made by **St Helens Green Belt Association (SHGBA)** and **Eccleston Community Residents Association (ECRA)** but in addition I would also make the following specific points:

Duty to Cooperate

The Submission Draft provides no evidence that the Council have satisfied their Duty to Cooperate. There is no evidence that the Council has satisfied this legal requirement. The Council seems to be competing with neighbouring local authorities for the same residents which will just create inward migration

①

LPA01 Presumption in Favour of Sustainable Development

I support Policy the Presumption in Favour of Sustainable Development but I am concerned that some policies in the Submission Draft will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just

②

LPA02 Spatial Strategy

In setting out this very ambitious strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attached to Green Belts. The "essential characteristics of Green Belts are their openness and their permanence". The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the "great importance" of Green Belt, their essential characteristics or purposes.

I understand that "exceptional circumstances" need to be demonstrated to release land from Green Belt. I cannot see anywhere in the Submission Draft where "exceptional circumstances" have been demonstrated.

③

LPA04 A Strong and Sustainable Economy

The Submission Draft suggests that St Helens growth trends are significantly higher than historic annual growth rates.

The economic outlook in the Submission Draft is based on out of date forecasts and employment growth is highly aspirational and optimistic. It is relying almost entirely on significant growth of logistic warehousing and does not take into account that warehousing jobs will be at risk because of future automation. It also does not take into account the influence that Brexit could have on the Liverpool Super Port and employment in transportation and warehousing in the region.

As such I believe that employment growth in the Submission Draft is not objectively assessed need but is out of date and extremely aspirational. It has been used subjectively to create a supply side scenario that is not supported by recent economic data and trends.

④ **LPA05 Meeting St Helens Borough's Housing Needs**

The Submission Draft sets out an ambitious strategy for the Borough over the period 1st April 2016 and 31st March 2035 planning for a minimum 9,234 net additional dwellings, at an average of 486 dwellings per annum which includes releasing land from the Green Belt for 2,172 new homes.

In doing so the Council are using an older ONS forecast (2014) of 486 houses per year being required when the latest estimate produced by the ONS (2016) predicts 383 houses per year are required. Surely, the most up to date figures should be used for something as important as a 15 years plan. If the Council used the more recent figures then there would be no need to release land from Green Belt for housing.

I note the Andy Burnham, the mayor of Greater Manchester, was very recently reported as taking issue with Kit Malthouse the Minister for Housing, over which set of housing projections Greater Manchester should use. Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that"

⑤ **LPA06 Safeguarded Land**

I understand that in drawing up new Green Belt boundaries the Council, where necessary, should identify areas of safeguarded land between urban area and the Green Belt in order to meet long term development needs beyond the Local Plan period but make clear that the safeguarded land is not allocated for development at the present time.

The Submission Draft goes further than this by specifically identifying sites, their preferred use and development capacity. This is not consistent with national policy as it is tantamount to allocating sites.

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, in St Helens the areas surrounding the town centre where community is most in need of the new housing and investment.

One particular area of Safeguarded Land which I will comment on later is the land referred to in the Submission Draft as "Land South of A580 between Houghtons Lane and Crantock Grove, Windle" known as **8HS**.

⑥ **LPA08 Infrastructure Delivery and Funding**

I'm not entirely sure what the Infrastructure Delivery Plan (IDP) document is as it doesn't really appear to be a plan at all. It does not provide any solutions to the problems that delivering this Local Plan will bring.

This IDP does not deliver any sort of plan at all to manage the employment and residential growth that is being assumed. It details some infrastructure projects that are currently underway for the problems of today, but doesn't actually appear to plan anything for the Local Plan.

The IDP touches on Healthcare and Education but how these will be funded or managed is 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.

Brownfield and Previously Developed Land.

The Submission Draft makes little or no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register. It is wrong to give up Green Belt land when so much Brownfield land is available within the Borough, land which could and should be developed.

Historically St Helens has a strong industrial heritage of both mining and glass works. Now that those industries are largely redundant in St Helens there is a large amount of Brownfield land close to the town centre which could be redeveloped for housing within the 15 years plan. 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 and 148 hectares are being reclassified as safeguarded land and included to fulfil the housing need, much less than 7% of the 3,170 hectares available, if it were to be remediated.

Brownfield sites tend to be closer the Town Centre and already have road infrastructure in place. New homes being built on the sites closer to the Town Centre would mean the residents would have greater access to public transport, both buses and trains, and the services in the Town Centre. I believe developing the Brownfield sites which are closer to the Town Centre would help regenerate the Town Centre.

Green Belt Review

In order for the Local Plan to be sound, it must surely be built upon the integrity of its data. The Green Belt Review document forms a significant part of the data but its validity needs to be questioned.

The points raised throughout the Green Belt Review (2018) clearly show inconsistencies with subjective scoring and findings. There is a significant element of subjectivity. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

Certain sites have been pre-selected for development, rather than being tested against other sites. I believe this to be true in the case of the land referred to as 8HS which is presently Green Belt land but is proposed to be released from Green Belt and safeguarded for development.

Site- Specific Comments

tailbacks of cars, vans and HGV's on the A580 which is already backed up at peak times of the day. Engines would be idling which would have a significant impact on air quality, noise and health in general.

The increase of a further 1,800 cars would be in the exact area that St Helens already has significant and intractable problems, at Windle Island and Bleak Hill/Rainford Road. Problems that already cannot be rectified and would be exacerbated.

Further, the roads adjacent on the village side of **8HS** are narrow and cannot accommodate the extra cars that 1,027 houses will generate.

8HS is not well serviced by public transport. The train stations are in the town centre, over 4 miles away. The current buses do not connect Eccleston and Windle with employment areas.

The majority of the **8HS** site would be in excess of 500m from a local store and over 1km to any sort of 'local centre'. This would increase the dependency on motor vehicles, especially for short trips, and again increase the traffic and congestion in the area.

Pedestrian safety has not been considered by the Council. Access to the nearest convenience store would require residents to have to cross on foot 4 lanes of the A580 without the aid of a foot bridge.

5. Infrastructure

There does not appear to be anything in the Infrastructure Delivery Plan for the 1,027 additional houses that would be built on **8HS**.

Development at **8HS** would result in unsustainable traffic growth which would cause severe traffic issues that surely cannot satisfy the NPPF. As I have already stated, this traffic growth will be in the exact area that the Borough already has significant and intractable problems, at Windle Island and Bleak Hill/Rainford Road. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded.

The IDP touches on Healthcare and Education but how these will be funded or managed is 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.

The IDP does not address the school places that will be required for 1,027 new homes at **8HS**. The Primary and Secondary schools local to **8HS** are already oversubscribed.

To introduce so many new family homes would result in the schools being unable to meet the demand for places and young children having to travel to different areas to attend school. Having to travel to schools further away would also add to the traffic congestion.

New schools would be required if **8HS** was developed but there is nowhere available to build them.

There is a total lack of infrastructure to support such a large site and nothing in the Plan to remedy this.

PO3421



St. Helens
Council

301

13 MAR 2019

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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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>MS</i>	Title:
First Name: <i>FRANCES</i>	First name:
Last Name: <i>HARROP</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>FARM COTTAGE, HOUGHTONS, LANG, ECCLESTON ST. HELENS</i>	Address:
Postcode: <i>WA10 5QG</i>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

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

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

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

Yes (Via Email)

No

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

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

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

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

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

Policy	01, 02, 04, 05, 06, 07	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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

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

Please see attached 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.

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Please continue on a separate sheet if necessary

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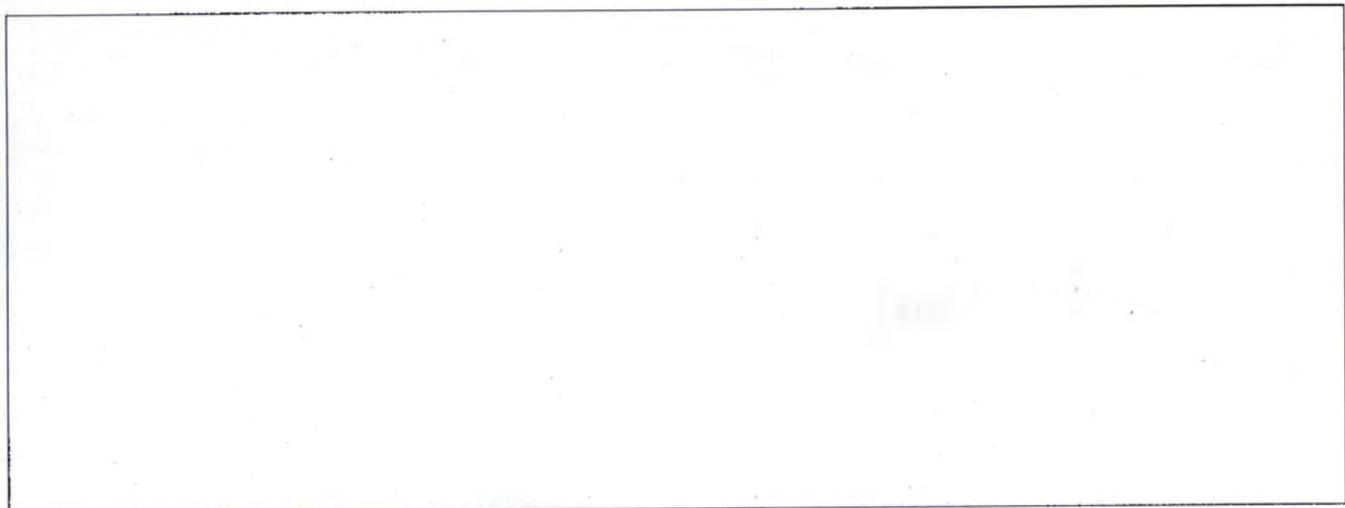
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you wish to participate at the oral part of the examination? (The benefits of doing so are:

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

Yes, I wish to participate at the oral examination

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



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

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

Frances Harrop
Friars Cottage
Houghtons Lane
Eccleston
WA10 5QE

Tel: [REDACTED]

Email: [REDACTED]

Date: 12th March 2019

Dear Sirs,

Re: St Helens Borough Local Plan Submission Draft 2019

I would be obliged if you would accept this letter as my response to the above proposed Local Plan.

Please note that I am in agreement to the representations made by **St Helens Green Belt Association (SHGBA)** and **Eccleston Community Residents Association (ECRA)** but in addition I would also make the following specific points.

I believe that the Local Plan fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF) and I also believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. I do not believe that the Local Plan is positively prepared, justified, effective or consistent with National Planning Policy. It is based on out of date forecasts and is extremely aspirational.

In particular I wish to object to the proposed release of Green Belt land under the Local Plan and with particular with reference to the proposed site in Eccleston/Windle referred to as **8HS**.

I am not opposed to development in the correct way as I firmly believe that St Helens urgently needs regeneration and development. However, I do not agree that this development should be partly by way of building over 2,172 new houses on Green Belt land.

I also do not agree that there is a need for land to be released from Green Belt land and safeguarded for development in the future.

Need for Houses.

(4) I have read through the Local Plan and I cannot see anything that justifies the Council's ambitious belief that there is a need for new homes to be built of at the rate of 486 houses per year. In doing so the Council are using an older ONS forecast (2014) when they could instead use the more conservative latest estimate produce by the ONS (2016) which predicts a need for 383 houses per year. If the Council adopted the latest figure there would then be no need to build on Green Belt land.

I appreciate that the Council wish to create new jobs and more employment in St Helens. However, the sort of jobs that would be created under the Local Plan would be low paying jobs and those people fortunate enough to obtain the employment would need to live where there are adequate public services and public transport in place. I therefore believe it would make sense for those homes to be close to the Town Centre rather than in Green Belt areas on the rural edge of the Borough.

Brownfield Sites.

I understand that there are many brownfield sites across St Helens that could be used for housing and employment development before Green Belt sites are released. I believe the Council should develop a strategy so that those sites can be utilised before Green Belt sites. Those sites which are contaminated should have a plan in place to make the land uncontaminated. The developers who wish to build houses in St Helens should only be given the option of Brownfield sites with the cost of cleaning up the sites being borne by the developers.

1 Brownfield sites tend to be closer the Town Centre and already have road infrastructure in place. New homes being built on the sites closer to the Town Centre would mean the residents would have greater access to public transport, both buses and trains, and the services in the Town Centre. I believe developing the Brownfield sites which are closer to the Town Centre would help regenerate the Town Centre.

2 Releasing Green Belt land should be a last resort because when it is released it is lost forever. Developers should not be given the option of building houses on Green Belt land when there are Brownfield sites that could be cleaned up and developed. Cleaning up contaminated land in St Helens in this way would benefit all the residents of St Helens. If developers are allowed to build houses on Green Belt land and make greater profits then there is no incentive for them whatsoever to clean up and develop Brownfield sites.

8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.

As I have already stated I do not believe that there is a need in the future for an additional 486 new homes per year in St Helens. Further if there is a need for some new homes I believe they should be developed in and close to St Helens Town Centre by developing unused Brownfield sites and vacant buildings. I believe this would help regenerate St Helens Town centre.

I therefore believe that the land known as 8HS should **not** be released from Green Belt and should **not** be developed on and the Council should reconsider their Local Plan in relation to that land for the following reasons:

- 6
1. **Housing in Eccleston.** Eccleston has already provided its fair share of housing in recent years, with the most recent example being the 262-home development on the former Triplex site. The developers of that site have still not been able to sell all of the new houses and a number remain unsold and unoccupied.
 2. **Road Infrastructure.** The above new development in Eccleston has already put local infrastructure under great strain. The roads in and around the Eccleston area are already congested and are inadequate to support existing traffic levels never mind increased traffic levels. 1,027 new homes on this site alone could increase the number of vehicles in the locality by approximately 1,900.
 3. **Traffic Congestion.** Story Homes, developers who wish to develop this site, suggest access to this new development would be from a new junction where Houghtons Lane meets the A580. If a new junction was created then there would be approximately 1,900 cars exiting on to the A580 on a stretch of road which already backed up at peak times. Further if any of the new residents wished to travel into St Helens (which I am sure the Council would hope would happen) then they would have to travel east on the A580 and attempt to turn right at Windle Island. It is widely known and accepted that Windle Island at present cannot manage

the current volume of traffic. The A580 is already having to cope with increased commercial vehicles due to the numerous warehouses being built along the A580 and also the Super Port at Liverpool Docks.

4. **Noise and Air Pollution.** The substantial increase in traffic will increase the Noise and Air Pollution. I understand that it is now accepted that there is a link between pollution and diseases such as dementia and asthma. With the roads around Eccleston being ill-equipped to cope with a sharp increase in vehicles on the road, passing the Local Plan and releasing this vast amount of Green Belt in Eccleston would put the health of Eccleston residents at risk.
5. **Inadequate services including Nursery provision, preschools, schools, doctors and dentists.** Local schools/preschools, doctors, dentists and other key services in Eccleston are already massively oversubscribed. The local plan does not adequately address these problems and the current services would not be able to support the proposed growth. For the last 10 years, Eccleston Health Centre has been operating from a Porta Cabin based in a church car park. The building of so many new homes would make the situation a lot worse and put the health of residents at risk. Schools in Eccleston are already short of spaces. To introduce so many new family homes would result in the schools unable to meet the demand for places and young children having to travel to different areas to attend school. Having to travel to schools further away would also add to the traffic congestion.
6. **Flooding.** A lot of Eccleston is on a flood plain with roads and properties over the years having been affected by flooding. Green Belt land acts as a "sponge" for the surface water and helps to reduce the amount of surface water in the area. If this site is developed then there is a great likelihood that the new homes that will be built would be affected by flooding and surface water. A development of this size and the loss of the Green Belt land is also likely to cause flooding problems for the surrounding roads and houses with the land no longer being able to act as a "sponge" for those surrounding roads and properties.
7. **Local Wildlife.** This this particular Green Belt land is home to numerous species of birds, including corn bunting, long tail tits, Owls, birds of prey and more recently waxwings have been spotted. Other wildlife including bats and hares are often seen on this Green Belt land. There are also migrating birds including Canadian Geese that come to this Green Belt land. All of these will be disturbed and lost from the area should the land be released from Green Belt, to enable development to take place, taking away their natural habitat due to loss of important trees, hedges and other vegetation.
8. **Footpaths.** This particular Green Belt site has public footpaths that are regularly used by residents of St Helens. By just being out for a walk with family and friends, walking their dogs or rambles on the footpaths and breathing in good clean air. To remove this easily accessible Green Space would contribute to obesity and other associated health problems.
9. **Agricultural Land.** This Green Belt land is Grade 1 & Grade 2 agricultural land and has been farmed for many years. It is a vital economic resource for produce and food. All of this would be lost to the present generation and future generations. This is particularly important as we do not know how Brexit will affect the food that we import. Also by having local produce available this can help reduce traffic and pollution problems associated with the transporting of produce. It also helps the regeneration of St Helens to encourage local shops and food outlets to support local farmers by purchasing their produce. This agricultural land also provides valuable employment to the farmers and the locals involved in the farming of the land and distribution of the crops. This employment would be lost if this Green Belt land was released.

Conclusion.

As I have stated I accept and support the Council in the need to regenerate and develop St Helens. I also appreciate that it is difficult for them but I would like to believe that when considering the Local Plan that the Council will listen to and take on board the views of the many residents in St Helens and in particular residents of the areas directly affected by the Local Plan. (3)

I firmly believe for the reasons that I have stated that the Council should not release any Green Belt land but instead should develop Brownfield sites and vacant buildings closer to the Town Centre. It seems illogical not to develop unused Brownfield sites and vacant buildings in this way which would clearly benefit the people of St Helens far greater than St Helens losing prime Green Belt land which would then be lost forever. (6)

I have already stated that I believe that Eccleston has already provided its fair share of housing in recent years. To release such a large area of Green Belt land at 8HS in Eccleston and Windle will reduce the attractiveness of the area and change the character of the area. This would be a significant loss of Green Belt land which is not only enjoyed by Eccleston residents but also residents of St Helens generally. (2)

If the development on the land at 8HS was to proceed there would be substantial over development in the Eccleston area which the existing road infrastructure and services would be unable to support. The local schools, doctors, dentists and other key services are already oversubscribed and would be unable to meet the demand of all the new residents. (6)

It is clear that financial contributions for education and off-site highway works are very likely to be required if 8HS was developed and there may be further requirements subject to detailed assessment of infrastructure needs. It is extremely worrying that the Council seems to have selected 8HS for such a large development without first fully identifying the needs and addressing fully how they will be met and funded. It is totally irresponsible to consider releasing Green Belt land to enable developers to develop on without first looking at the long term costs and detrimental effects to the locality and St Helens generally. (1)

I would urge the Council to reconsider their Local Plan with a view to creating a Plan which would help regenerate the Town Centre and also protect the Green Belt and attractiveness of it for the residents of St Helens and their future generations. (2)

Please can you acknowledge safe receipt and confirm that my comments will be considered.

Yours faithfully,



Frances Harrop

PO3422

Representor Details

Web Reference Number	WF0036
Type of Submission	Web submission
Full Name	M Anthony Jones
Organisation	
Address	91 Old Lane Eccleston Park Prescot L34 2RF
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	LPA08
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.

LPA08 – Infrastructure Delivery and Funding

A major concern that we have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it.

The IDP highlights quite well the projects currently underway in the Borough to try to alleviate the problems of today, however seems to lack any substance on what will actually be done to solve the issues of the future. The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Rainhill Village, Portico Lane and Rainhill Road that surround Site 3HS (for example, a restriction on housing development on the 3HS site has been imposed until traffic issues are investigated and resolved). The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP. So therefore, cannot be justified.

Road infrastructure around Site 3HS consists of two B Roads, Rainhill Road and Portico Lane which currently cannot support the existing traffic or be widened so will not cope with an extra 1000 vehicles if houses are built on Site 3HS.

Declining industries since the mid 1980's around the area of 3HS has meant that local people predominantly rely on employment outside the area. Most of the planned employment areas in LPSD are in the east of the borough, therefore commuters would have to travel through the already congested roads around 3HS.

Quoted on Page 118 of the Green Belt Review December 2018 states "A further constraint relates to the highway network in the surrounding area of 3HS both within St. Helens Borough and Knowsley Borough." 272 new properties being built in Scotchbarn Lane off Portico Lane.

Warrington Road and Rainhill Road heavy traffic congestion. The Skew Bridge @ The Junction of these 2 Roads is Grade 2 listed (built in 1829).

The south of Rainhill Village, Knowsley Borough are to build 4000 properties in Halsnead Garden Village, which will further add to the traffic congestion in the area.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best.

Eccleston Lane Ends and St. Ann's Primary, Longton Lane Primary and Rainhill High are all oversubscribed at present. There will be more school places required if 1000 homes are built on site 3HS. The IDP does not deal with the long-term impacts of the education needs of new and existing communities. Therefore, the plan is unsound.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided. Whiston and St. Helens Hospitals have long waiting lists above the national average. The A&E department at Whiston Hospital is also overstretched.

Taking all of the above in to account, 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.

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

LPA08 Modification:

The IDP is neither clear nor defined and does not present solutions to current or future development issues. St Helens Council needs to provide a more detailed and comprehensive IDP to ensure that any such development proposals that take place in the future are both deliverable and sustainable. Without such a document, the LPSD cannot, and should not be considered sound at inspection.

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 4:28:41 PM
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PO3423

Representor Details

Web Reference Number	WF0040
Type of Submission	Web submission
Full Name	Mrs Judith Jones
Organisation	
Address	91 old lane eccleston park L342RF
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	LPA08
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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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.

LPA08 – Infrastructure Delivery and Funding

A major concern that we have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it.

The IDP highlights quite well the projects currently underway in the Borough to try to alleviate the problems of today, however seems to lack any substance on what will actually be done to solve the issues of the future. The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Rainhill Village, Portico Lane and Rainhill Road that surround Site 3HS (for example, a restriction on housing development on the 3HS site has been imposed until traffic issues are investigated and resolved). The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP. So therefore, cannot be justified.

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LPSD are in the east of the borough, therefore commuters would have to travel through the already congested roads around 3HS.

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

LPA08 Modification:

The IDP is neither clear nor defined and does not present solutions to current or future development issues. St Helens Council needs to provide a more detailed and comprehensive IDP to ensure that any such development proposals that take place in the future are both deliverable and sustainable. Without such a document, the LPSD cannot, and should not be considered sound at inspection.

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 4:22:30 PM
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PO3424

Representor Details

Web Reference Number	WF0061
Type of Submission	Web submission
Full Name	Mr Tom Clarke MRTPI
Organisation	Theatres Trust
Address	22 Charing Cross Road London WC2H 0QL
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LPA08: Infrastructure Delivery and Funding
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

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

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

We also support this policy, which further elaborates the protection and support for valued facilities building on earlier policies LPA03 and LPA04.

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

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

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

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

Response Date	3/13/2019 2:11:17 PM
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PO3425

①-LPA08 ②-LPA02 ③-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0164
Type of Submission	Web submission
Full Name	Mr Dylan Riley
Organisation	
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.

These plans will lead to significant additional traffic congestion on a network that is already at breaking point and continually log-jammed across the town.

This will be made even worse by the need for additional and/or expanded schools.

St Helens Council has a long history of failing to deliver infrastructure.

It will have a detrimental effect on highway safety for both pedestrians, cyclists and drivers.

Schools and nurseries are already over-subscribed and this Plan will only lead to even more pressure.

Social infrastructure will not be able to cope; doctors, dentists and the hospitals.

Increased traffic will exacerbate health problems across the town due to increased pollution and isolated developments increasing car dependency and therefore potentially obesity.

There will be a significant loss of recreational areas for walking and escaping urban areas and additional sports facilities such as a golf course if Green Belt development is allowed.

There is a huge amount of Brownfield land available to develop in St Helens but it seems the easier option is Green Belt.

The council are pandering to demands of landowners and developers seeking to make huge profits at the expense of GB.

Neighbouring areas such as Knowsley also has extensive Brownfield sites and a Duty to Co-operate could find a common strategy – none appears to have been carried out.

①

②

③

There are no exceptional grounds to alter GB boundaries and by doing so would leave the town continuing to be blighted by brownfield and contaminated sites, whilst developers profit and the council take the increased taxes to be wasted.

2

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

No green belt should be released as no exceptional circumstances.
The growth projections should be revised to something more realistic

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 7:35:43 PM
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PO3426

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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PO3427

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, if it were to be remediated. 08

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

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 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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PO3428

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:

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- the requirement for Sustainable development. 0

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- 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 5:58:24 PM
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PO3429

Representor Details

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 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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PO3430

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

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

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015)

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

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

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

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date

3/7/2019 12:03:49 PM

PO3431

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

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. 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.

- 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 6:20:22 PM
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PO3432

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.
- 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.

- 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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PO3433

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.

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

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

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

Response Date	3/2/2019 1:35:59 PM
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PO3434

Representor Details

Web Reference Number	WF0404
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 4:24:45 PM
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PO3435

Representor Details

Web Reference Number	WF0408
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 4:14:00 PM
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PO3436

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

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 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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PO3437

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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PO3438

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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PO3439

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.

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.

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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PO3440

① - LPA04 ② - LPA05 ③ - LPA08

Representor Details

Web Reference Number	WF0466
Type of Submission	Web submission
Full Name	Mrs Sue Lemasurier
Organisation	Mrs
Address	72 Broadway Eccleston, WA105DH WA10 5DH
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective

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

The figures used to justify economic growth predictions are out of date and therefore the targets within the plan are not justified. The plan does not take account of Brownfield and PDL land not yet on the Brownfield Register, nor does it take account of land that is only mildly contaminated and could be made suitable for housing at relatively small expense - surely it makes sense to use such sites for housing before considering the use of green space, especially within the long term of the plan period. It seems to me the plan is more for the economic benefit of farmers and developers than it is for the population of the area. It is unclear how and where the necessary infrastructure to support such a large development will be provided and funded. As town centre shops become increasingly empty plans to develop housing within the town centre could go some way towards providing housing, for example through the provision of social housing for the elderly with ground floor retail provision thus freeing up existing family sized homes, and also through providing town centre apartments for first time buyers. I appreciate the need to provide housing and also to bring more money into the town but do not think a large edge of town estate will benefit the local community: instead it will deprive them of the countryside which together with relatively easy transport connections makes the area desirable - if the plan does proceed I think the result will be a decline in desirability of the local area and result in lower local spending for the town. I think the Council should ensure efficient use of its existing housing stock together with unused and unsightly sites in order to clean up the town and bring it into the current century, together with allowing small

①
②
③
②

select developments in order to attract people with higher incomes into the area since it is only by increasing average income levels locally that the town centre will have the potential to become an attractive place to live near.

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2

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

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

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

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

Response Date	2/21/2019 12:44:50 PM
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PO3441



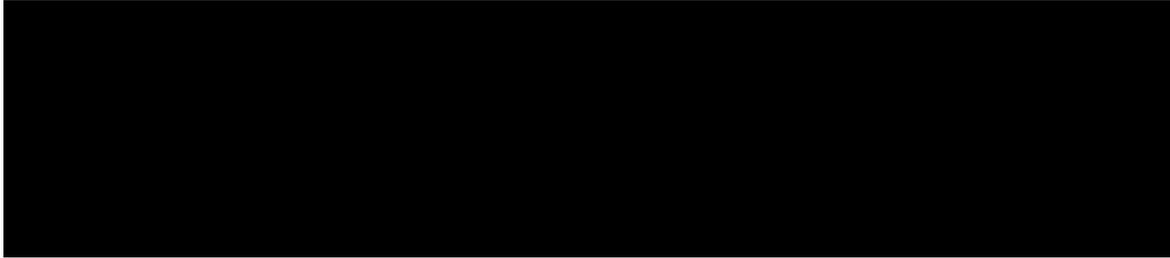
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

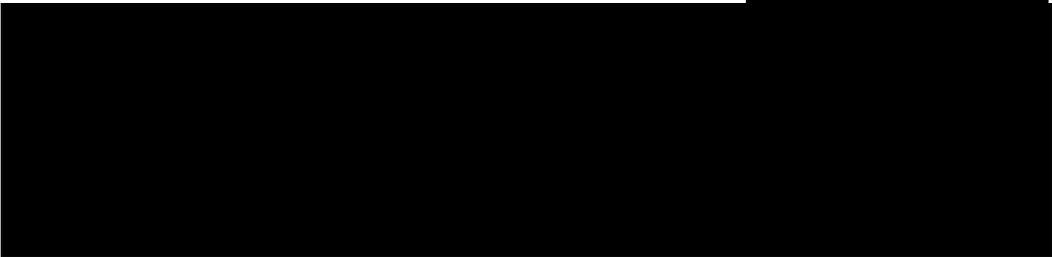
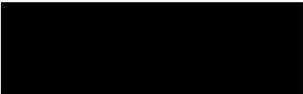
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44

3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.

3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45

3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46

Policy LPA08 – Infrastructure Delivery and Funding

3.47 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified because it does not make sufficiently clear the circumstances in which certain contributions will be sought. 47

3.48 In the first instance, at Part 1 of the policy it is unclear what is meant by 'all forms of infrastructure' that are required to serve the needs of the local community. The Local Plan must be sure to ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities. 48

3.49 Clearly there is a mechanism for the pooling of contributions for wider infrastructure delivery through CIL charging but, we understand, this is not something that the

Council is currently seeking to secure. On this point, we consider that it is unnecessary for the Council to make reference to CIL Charging within its Local Plan unless there is an intention to utilise such measures. 48

3.50 In its current drafting, Part 2 of the Policy would allow the Council to require S.106 Contributions to meet the needs of a wider area for contributions that would not directly relate to the development in scale or kind. Such contributions would fail the tests of the NPPF and CIL Regulations for developer contributions and as such Policy LPA08 should be redrafted to ensure no such contributions can be required. 49

3.51 The hierarchy approach identified within Policy LPA08 sets out situations where financial contributions are required. These include i) contributions essential for public safety or minimum acceptable level of design; ii) necessary to address local infrastructure requirements or to provide affordable housing; and, iii) any remaining contributions. We do not consider this approach to be fully justified. 50

3.52 We consider it to be unnecessary to take this approach, because any required financial contributions can be dealt with by way of a negotiated Section 106 contribution; with such a sequential approach to those negotiations being unnecessary.

3.53 We do however support the policy allowance for viability assessments to be submitted with planning applications to establish the required level of developer contributions effect on viability. We do suggest that the policy is explicitly worded to state that developer contributions can be reduced in such situations. 51

Policy LPA09 – Green Infrastructure

3.54 Whilst our Client supports the maintenance and enhancement of Green Infrastructure of recognised value, we consider that the above policy must not designate equal importance to all green areas. It is vital that in relation to both plan making and decision making have regard to evidence in relation to the amenity and ecological value of Green Infrastructure. Not all Green Infrastructure will be of equal value and indeed worthy of the same mechanisms of protection as other sites (as demonstrated through the Council's allocation of greenfield sites for development within the Local Plan. 52

PO3442



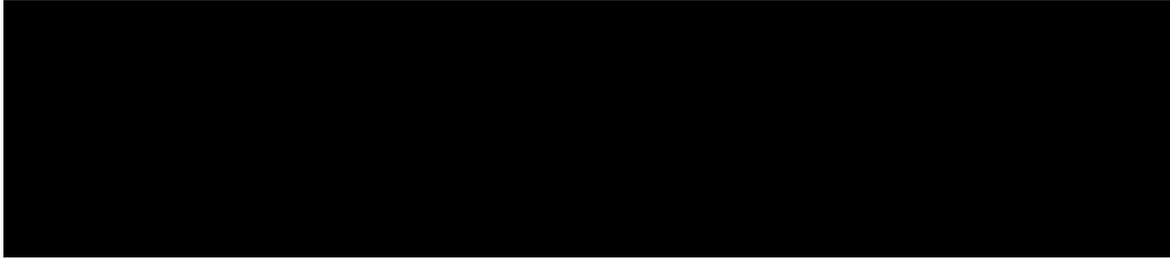
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

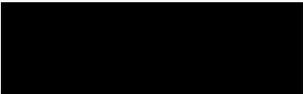
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44

3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.

3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45

3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46

Policy LPA08 – Infrastructure Delivery and Funding

3.47 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified because it does not make sufficiently clear the circumstances in which certain contributions will be sought. 47

3.48 In the first instance, at Part 1 of the policy it is unclear what is meant by 'all forms of infrastructure' that are required to serve the needs of the local community. The Local Plan must be sure to ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities. 48

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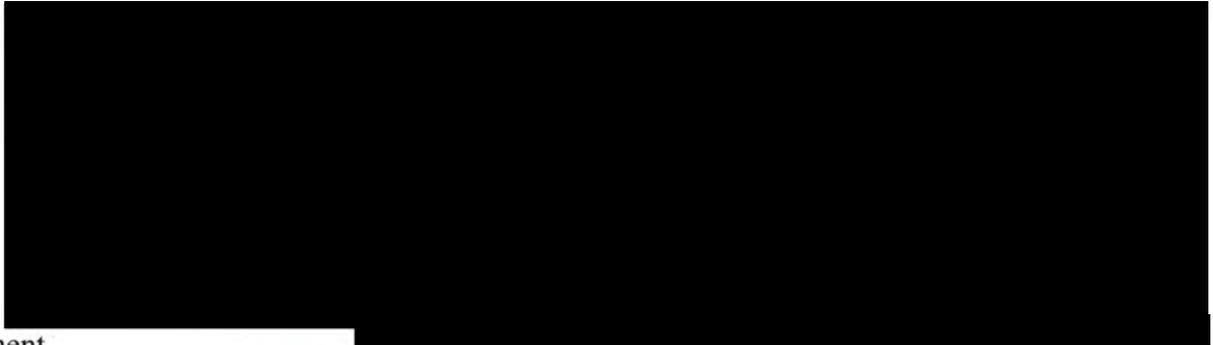
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PO3443



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



1 Attachment



CCfE_reps to St Helens Local Plan_without appendices_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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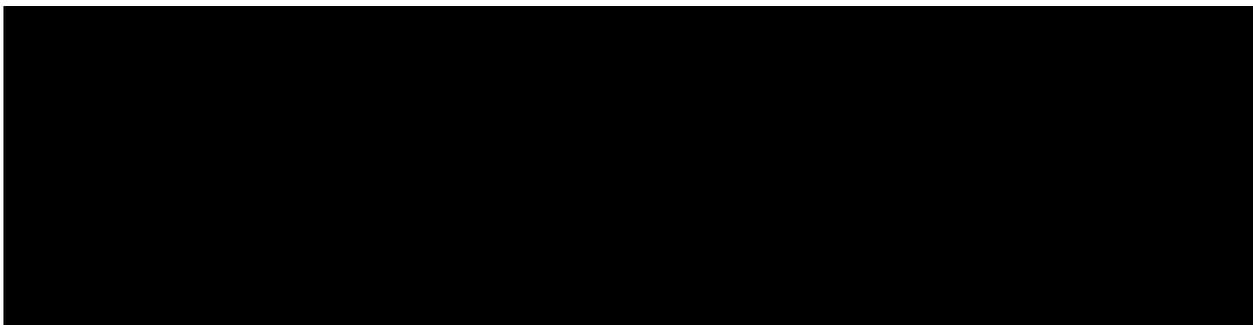
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP



From: Kennedy, Amy (UK - Manchester)
Sent: 13 March 2019 15:00
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



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

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





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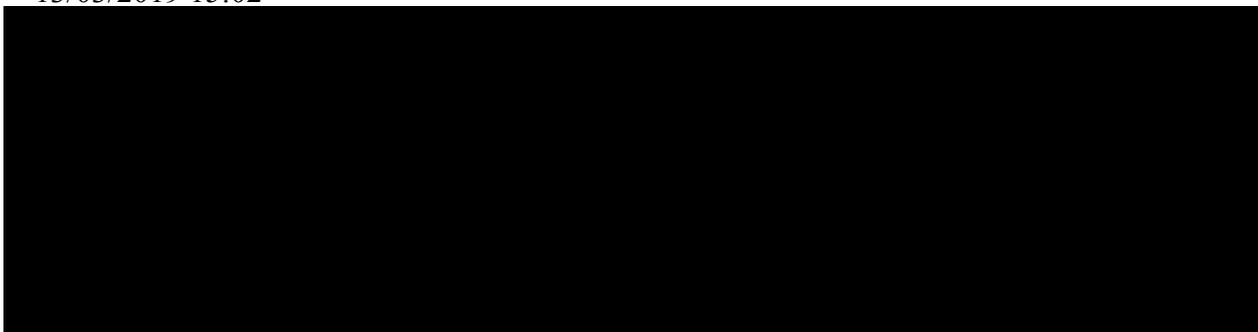
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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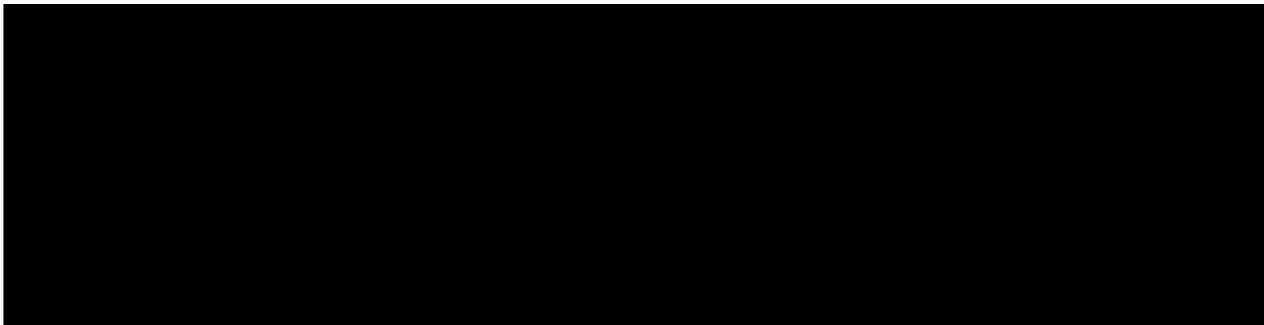
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy
Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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

March 2019

2.44 We maintain that this incorrect approach to the Green Belt boundary has been carried through within the 2018 St Helens Green Belt Review which forms part of the evidence base for the Draft Plan. The Commissioners' own Green Belt assessment shows that, when reassessed in accordance with the Commissioners' vision for the land, there are two sites which are suitable for release from the Green Belt: one site which could be allocated for residential development within the Plan period; and another site which could be identified as safeguarded land for future residential development, as set out at paragraph 2.39 above.

09

2.45 Further details of the suitability of these sites for allocation are included in Section 3.

Policy LPA08: Infrastructure Delivery and Funding

2.46 The Commissioners are supportive of the Council's efforts in seeking to ensure that infrastructure delivery is provided to support the growth in the Borough over the Plan period. Nevertheless, we have a number of objections regarding the approach set out within draft Policy LPA08.

2.47 Parts 3 and 4 of draft Policy LPA08 states that:

3. *Where the suitability of development depends upon the provision of additional or improved infrastructure or service capacity, that development should be phased to coincide with the provision of such infrastructure or capacity.*
4. *In applying this Policy, regard will be had to relevant evidence including the latest version of the St Helens Infrastructure Delivery Plan.*

2.48 The Commissioners object to these parts of the draft policy, and believe it is unsound on the basis of not being positively prepared, being ineffective and inconsistent with national planning policy.

2.49 The Commissioners support the principle that development proposals should contribute towards the necessary infrastructure needed to support them (subject to viability and other considerations). However, the approach in Parts 3 and 4 of the draft policy has the potential to significantly delay development, as the provision of some infrastructure may require contributions from multiple sources both in the private and public sector.

10

2.50 It is therefore inevitable that the ability to deliver some infrastructure may be beyond the control of some developers as it is reliant of the involvement of third parties. In this instance, it may be that although a developer has contributed their share towards infrastructure associated with their development, they are prohibited from delivering the proposals as other parties which are involved in the infrastructure may not yet have contributed. Development could therefore be stalled unnecessarily as a result of this approach.

2.51 The Commissioners therefore believe that draft Policy LPA08 should be amended to state that relevant infrastructure will be phased in accordance with housing delivery (not vice versa) in order to make this policy sound and compliant with the stated aims of national planning policy, as set out within Paragraph 59 of the NPPF, which identifies "significantly boosting the supply of homes" as a key Governmental objective.

PO3444



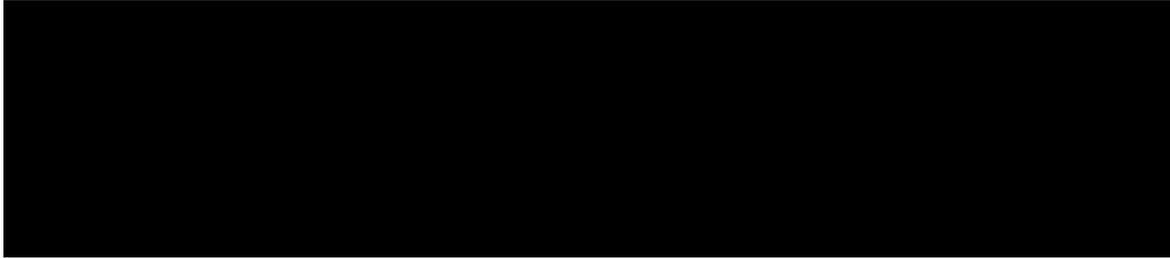
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

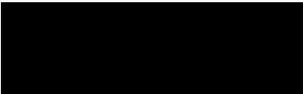
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44

3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.

3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45

3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46

Policy LPA08 – Infrastructure Delivery and Funding

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PO3445



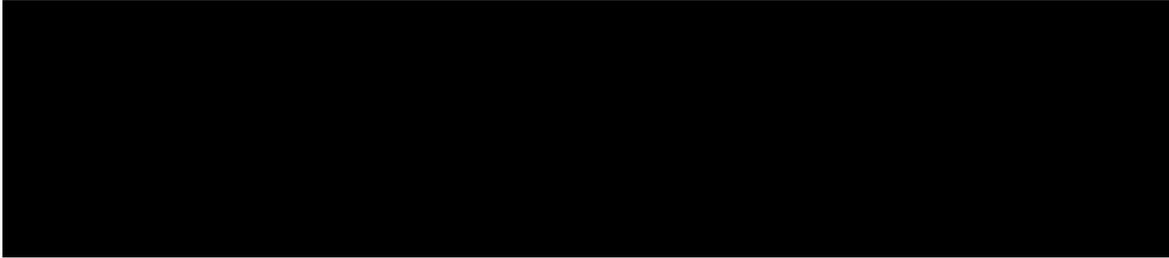
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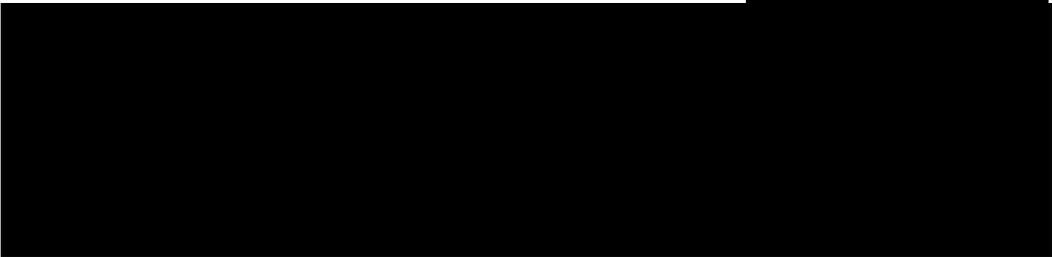
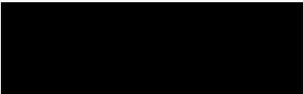
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Please see accompanying representations

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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

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PO3446

269

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



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>Stacy Manley</u>	First name:
Last Name: <u>Manley</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.

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

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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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? HA- HS							
Policy LPA08 LPA09 LPA11 LPA12 LPA14	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input 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 <u>set out</u> your comments.
<p>no infrastructure for ex-council house / no schools doctors / dentist to support / use Ashkan as the doctors could never give appointments 2 weeks there are 500 more gangs to help cost of child to go to Wilson School as none in Area 5K → St Helens policy not to build any more (500 jobs child & more)</p> <p>Junction 23 cant support 1 travel to Manchester it would cause extra hour of hours to an already long drive / which also increase pollution & health and mental health issues it will cause this junction has taken the biggest hit all around Haydock and it will continue to decline if more buildings is done</p>

Please continue on a separate sheet if necessary

Brexit require grow own, so grade 2 fields
 are needed to supply food - AN figures don't support
 cancel figures

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.

- Infrastructure in place for existing houses
 - schools to be built + floodings to be rectified - provisions for increase of pollution on health of community!
 - train station to be upgraded to acomoder Prans / Disabled /
 - Brown field sites to be exhausted. Still a lot available which are not being used.
 - Mental Health provisions as decrease in Greenbelt ~~will cause depression~~

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.

PO3447



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 St</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

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WA10 1HP**

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Telephone: **01744 676190**

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate? <i>IHA IHS</i>										
Policy <i>LPA 2</i> <i>LPA 1</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.

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

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Please keep a copy for future reference.

PO3448

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 Marley</u>	Title:
First Name: <u>Reece</u>	First name:
Last Name: <u>Glyn Marley</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 Smock Lane</u> <u>Garswood</u>	Address:
Postcode: <u>WN4 0SN</u>	Postcode:
Tel No:	Tel No:
Mobile: 	Mobile No:
Email:	Email:

Signature: 	Date: <u>28/2/19</u>
--	----------------------

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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.

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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?								IHA / IHS	
Policy LPA01 LPA11 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 <u>unsound</u>, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

PO3449

Representor Details

Web Reference Number	WF0014
Type of Submission	Web submission
Full Name	Dr Joshua Masheder
Organisation	
Address	14 The Pastures New Bold St Helens WA9 4ZB
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	Greenbelt Building
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified

6. Please give details of why 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 work in the local hospital and community as a Doctor, I regularly work in the local ED and regularly see trolley waits of over 6 hours. This not only puts residents at risk due to prolonged waits to see a doctor and receive treatment it also adds a pressure for patients to be discharged in order to make further space. I feel should this building work go ahead there is not enough infrastructure in neither Whiston or Warrington hospital to cope with the increased demand. This puts the current residents at increased risk, and the new residents in an area with not enough facilities to cope with the demand. This does not only apply to the hospital but local GP, Dentists, Ambulance Services. The country nationally is struggling for health care professionals, building more houses in an area where these essential facilities are already bursting at the seams but the current residents lives at risk. The Road infrastructure around the area including the M62, local roads and schools WOULD NOT COPE WITH THE EXTRA DEMAND.

Before any further houses are passed, I feel that a consultation with health suppliers, schools, local amenities needs to happen to find how these services will cope.

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

Reduce the housing planned.

Build on Brown Sites.

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:

A prospective of a health professional in an area where the resources are already saturated. I feel it necessary to have an input from a residents and employee perspective.

Response Date	5/2/2019 11:48:11 PM
---------------	----------------------

PO3450

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
---------------	----------------------

PO3451

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

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- 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:

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- 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.
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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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PO3452

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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PO3453

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
-
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
 - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date	3/7/2019 12:03:49 PM
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PO3454

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

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. 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.
- 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 6:20:22 PM
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PO3455

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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PO3456

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.

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

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

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

Response Date	3/2/2019 1:35:59 PM
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PO3457

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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PO3458

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.
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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.
 - 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:

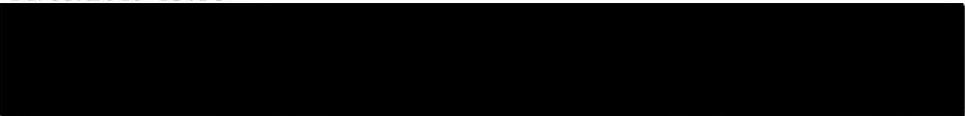
Response Date	2/24/2019 3:06:37 PM
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PO3459

ELOOS6



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



1 Attachment



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

To whom it may concern,

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

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

Kind regards.

Dan Ingram
Senior Planner



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

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

- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

- ⑧ - LPA04
- ⑨ - LPA04.1

- ⑩ - LPA05
- ⑪ - LPA05.1

- ⑫ - LPA06
- ⑬ - LPA08

- ⑭ - LPA09
- ⑮ - LPC01

- ⑯ - LPC02
- ⑰ - LPC07

- ⑱ - LPC09

- ⑲ - Appendix 5



St.Helens
Council

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

EF0176

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

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

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on Behalf of Andrew Cotton and Family

March 2019

- 3.55 Our Client is concerned that whilst the IDP contains a comprehensive list of projects required to deliver the growth of the Borough, it does not contain details of site-specific requirements. Particularly in the case of the sites allocated for development, one would expect specific requirements to be outlined with details of the allocation. The IDP fails to do this. Whilst the Site Profile in Appendix 5 provides some information about what may be required this is vague and does not provide any clarity or certainty going forward. Our Client considers that greater, site-specific detail around developer contributions is required in order for them to be able to endorse this Policy.

13

Policy LPA09: Green Infrastructure

- 3.56 This Policy outlines what the Green Infrastructure network is and why it is of value to the Borough. The Policy details how the Council will work with other organisations to improve and enhance the Green Infrastructure network noting that development proposals on strategic housing and employment sites incorporate holistic Green Infrastructure Plans. The Policy also outlines that developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites. Furthermore, the Policy states that development that would contribute to, or enhance the function of the Green Infrastructure network will be encouraged.
- 3.57 Our Client is supportive of this Policy and notes the encouragement given to development proposals which will enhance the Green Infrastructure network.
- 3.58 Our Client's land interest, with proposed allocation 4HA and within the area covered by the adopted Bold Forest Area Action Plan and provides an excellent opportunity for Green Infrastructure enhancements to an area which is largely grassland presently. This accords with the vision and objectives of the Council and will facilitate a high-end development of aspirational homes, something of which there is currently a deficit within the Borough.
- 3.59 In addition, our Client is satisfied that the Policy does not conflict with the adopted Bold Forest Area Action Plan which, with regard to meeting the strategic land use needs of the Borough, requires strategic developments to contribute positively to the development of the Bold Forest Park, not result in the loss of any critical infrastructure elements and enhance connectivity between urban areas and the forest park (in the case of housing and employment developments).

14

- 3.60 Linking to this, our Client notes the requirements of the Site Profiles in Appendix 5 of the New Local Plan, particularly with regard to providing a well-landscaped setting including extensive green links promoting the objective of the Bold Forest Area Action Plan of increasing tree coverage by 30%. Whilst the clear aim would be to deliver a development which includes extensive green links and increased tree coverage our Client considers the wording of the Site Profile should afford some flexibility to this. The use of the word 'must' does not provide any flexibility, and does not consider whether the delivery of such Green Infrastructure would render the development unviable. Our Client requests that additional flexibility be introduced into the Site Profile in this regard.
- 3.61 Notwithstanding the above however, a Concept Masterplan relating to our Client's land interest has been produced in support of this representation and is discussed further within Section 6 below.

14

Policy LPC01: Housing Mix

- 3.62 This Policy outlines that both new market and affordable dwellings will be expected to cater for a range of types tenures and sizes of homes as informed by the SHMA. The Policy indicates that proposals for new housing of 25 dwellings or more on greenfield sites will require at least 20% are accessible and adaptable and at least 5% area designed for wheelchair uses, in line with the Building Regulations 2010. The Policy also requires 5% of new homes on greenfield developments of 25 dwellings or more to be bungalows.
- 3.63 The Policy also provides for exceptions to these requirements should a viability assessment demonstrate that meeting such requirements would render the development un-viable.
- 3.64 Our Client does have some concerns around the requirement for 5% of new homes on greenfield sites being bungalows and considers that there is little justification as to why this should be the case. The Policy does not consider factors such as the character of the area or impact upon densities. Our Client is unable to endorse this aspect of the Policy and considers that the Council should provide further evidence in order to justify its position.

15

PO3460

ELO117



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

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

1. Green Infrastructure in St.Helens Borough comprises a network of multifunctional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside areas. This network is capable of delivering a wide range of environmental and quality of life benefits for local communities and forms an important element of the Liverpool City Region (LCR) Ecological Network.

2. The Council will work with other organisations where necessary to:

a) expand tree cover in appropriate locations across the Borough to improve landscape character, water and air quality and the value of trees to wildlife;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

b) strengthen and expand the network of wildlife sites, corridors and steppingstone habitats to secure a net gain in biodiversity;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

c) improve and increase the connectivity of the Greenway network;

d) increase the accessibility of open space within walking distance of housing, health, employment and education establishments to promote healthy lifestyles;

The Council has the opportunity to maintain and improve all the aspects listed above by retaining the EPGC land as green belt.

4. Development that would contribute to or provide opportunities to enhance the function of existing green infrastructure and its connectivity from residential areas, town, district and local centres, employment areas and other open spaces, will be encouraged. Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.

This policy appears to be in direct conflict with the proposal to change the status of EPGC from 'Green Belt' to 'Safeguarded'.

The only exceptions to this will be where it has been demonstrated that: appropriate protection or retention of Green Infrastructure assets cannot be achieved;

I cannot imagine a scenario in which retention cannot be achieved if the Council has the will to retain it – unless the Council's wish to retain is overridden by a higher-authority (e.g. national government). It would be helpful if the plan could expand on this paragraph and state some examples of when protection or retention of Green Infrastructure assets cannot be achieved.

the development would bring benefits that would over-ride the resultant harm;

Benefits' will always be subjective and a matter of opinion. The Council should adopt a policy of zero-tolerance to harming Green Infrastructure assets regardless of any perceived benefits.

PO3461



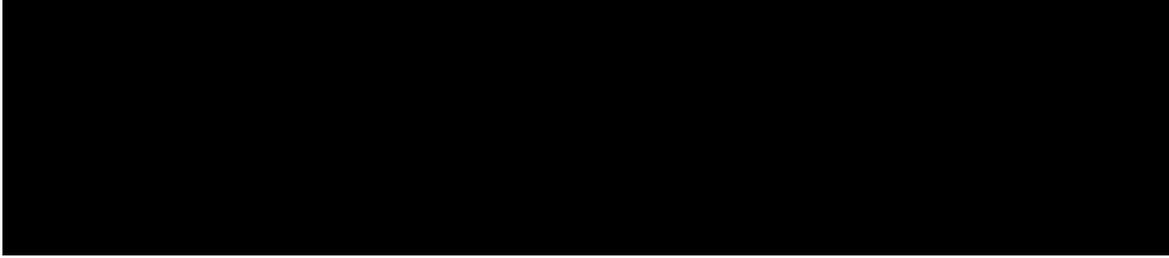
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

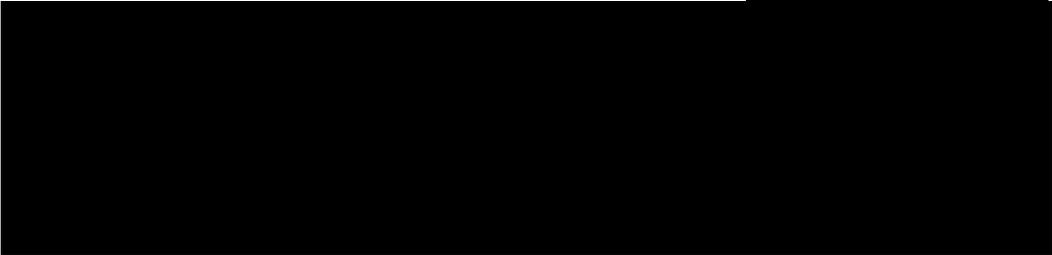
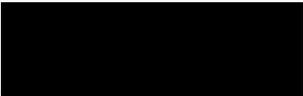
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

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

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

Council is currently seeking to secure. On this point, we consider that it is unnecessary for the Council to make reference to CIL Charging within its Local Plan unless there is an intention to utilise such measures. 48

3.50 In its current drafting, Part 2 of the Policy would allow the Council to require S.106 Contributions to meet the needs of a wider area for contributions that would not directly relate to the development in scale or kind. Such contributions would fail the tests of the NPPF and CIL Regulations for developer contributions and as such Policy LPA08 should be redrafted to ensure no such contributions can be required. 49

3.51 The hierarchy approach identified within Policy LPA08 sets out situations where financial contributions are required. These include i) contributions essential for public safety or minimum acceptable level of design; ii) necessary to address local infrastructure requirements or to provide affordable housing; and, iii) any remaining contributions. We do not consider this approach to be fully justified. 50

3.52 We consider it to be unnecessary to take this approach, because any required financial contributions can be dealt with by way of a negotiated Section 106 contribution; with such a sequential approach to those negotiations being unnecessary.

3.53 We do however support the policy allowance for viability assessments to be submitted with planning applications to establish the required level of developer contributions effect on viability. We do suggest that the policy is explicitly worded to state that developer contributions can be reduced in such situations. 51

Policy LPA09 – Green Infrastructure

3.54 Whilst our Client supports the maintenance and enhancement of Green Infrastructure of recognised value, we consider that the above policy must not designate equal importance to all green areas. It is vital that in relation to both plan making and decision making have regard to evidence in relation to the amenity and ecological value of Green Infrastructure. Not all Green Infrastructure will be of equal value and indeed worthy of the same mechanisms of protection as other sites (as demonstrated through the Council's allocation of greenfield sites for development within the Local Plan. 52

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

52

53

Policy LPC01 – Housing Mix

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

54

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

55

Policy LPC02 – Affordable Housing Provision

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

56

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

57

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage

58

PO3462



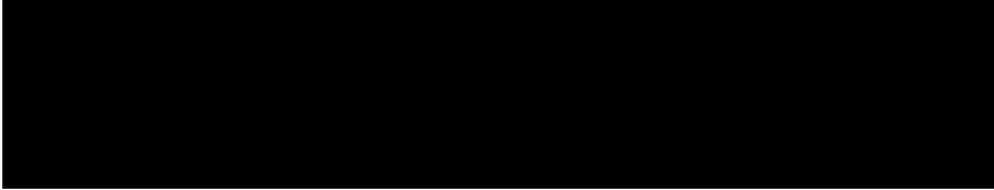
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



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



Representation Form.pdf

To whom it may concern,

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

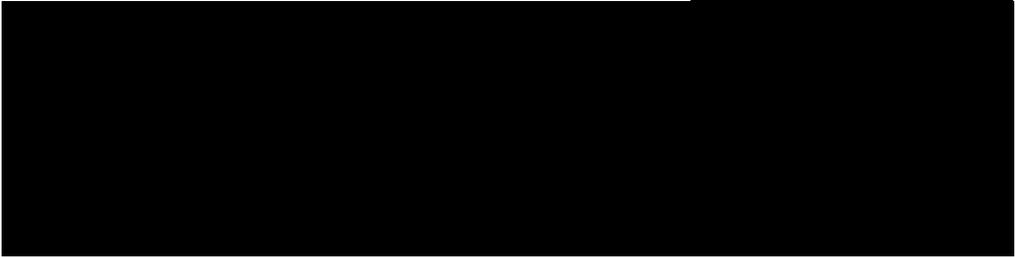
I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.

Dan Ingram

Senior Planner





St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

Signature

Date:

13 / 03 / 19

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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



Yes, I wish to participate at the oral examination

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

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

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

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

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on behalf of Miller Homes

March 2019

-
- 9.23 Our Client also considers that mechanisms should be put in place throughout the Plan to ensure that sites can continue to be delivered in the event that there is a shortfall in the Council's supply of new housing.

Policy LPA09: Green Infrastructure

- 9.24 This Policy outlines what the Green Infrastructure network is and why it is of value to the Borough. The Policy details how the Council will work with other organisations to improve and enhance the Green Infrastructure network noting that development proposals on strategic housing and employment sites incorporate holistic Green Infrastructure Plans. The Policy also outlines that developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites. Furthermore, the Policy states that development that would contribute to, or enhance the function of the Green Infrastructure network will be encouraged.

-
- 9.25 Our Client is supportive of this Policy and notes the encouragement given to development proposals which will enhance the Green Infrastructure network. 29

Policy LPC01: Housing Mix

- 9.26 This Policy outlines that both new market and affordable dwellings will be expected to cater for a range of types tenures and sizes of homes as informed by the SHMA. The Policy indicates that proposals for new housing of 25 dwellings or more on greenfield sites will require at least 20% are accessible and adaptable and at least 5% area designed for wheelchair uses, in line with the Building Regulations 2010. The Policy also requires 5% of new homes on greenfield developments of 25 dwellings or more to be bungalows.
- 9.27 The Policy also provides for exceptions to these requirements should a viability assessment demonstrate that meeting such requirements would render the development un-viable.

-
- 9.28 Our Client does have some concerns around the requirement for 5% of new homes on greenfield sites being bungalows and considers that there is little justification as to why this should be the case. The Policy does not consider factors such as the character of the area or impact upon densities. Our Client is unable to endorse this aspect of the Policy and considers that the Council should provide further evidence in order to justify its position. 30

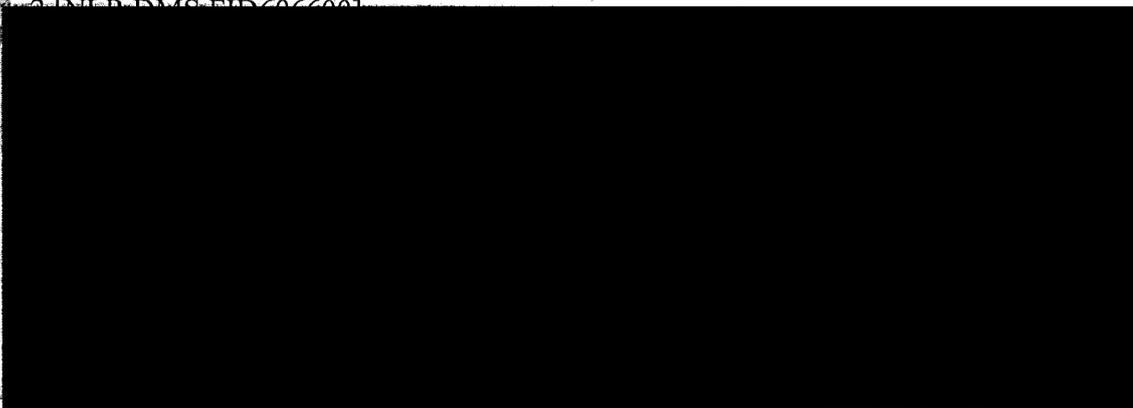
-
- 9.29 Notwithstanding the above, our Client is generally supportive of this Policy, recognising the need to provide for a range of dwellings catering for the needs of the whole

PO3463

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 | ㉑ LPD01 |
| ⑮ LPC01/3 | ⑱ LPC05 | ㉒ LPD01 | ㉓ LPD02 |
| ⑯ LPC01/5 | ㉒ LPC10 | ㉔ LPD01 | ㉔ LPD03 |
| ⑰ LPC01/6 | ㉓ LPC12 | ㉕ LPD01 | ㉕ LPD07 |
| | | | ㉖ 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

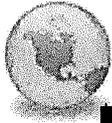
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

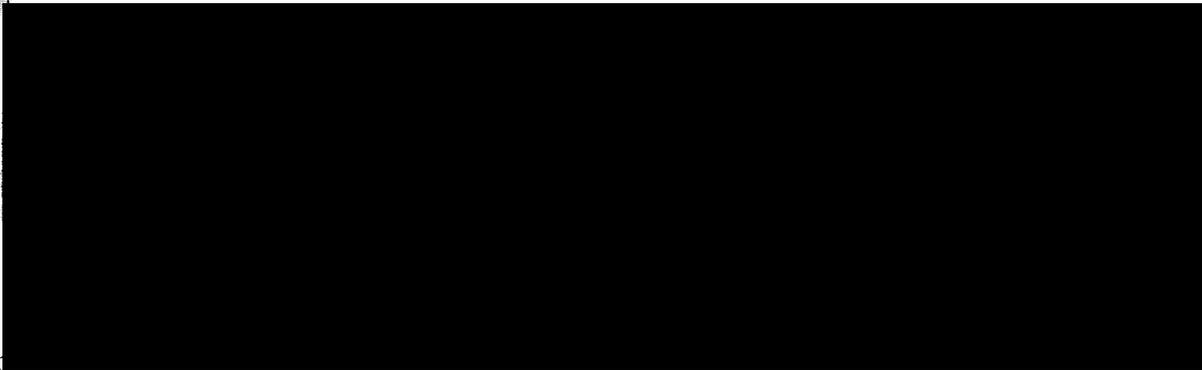
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2
[NLP-DMS.FID606600]
Brian O'Connor



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 4WJ

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

11.0 **Policy LPA09: Green Infrastructure**

Introduction

- 11.1 Policy LPA09 seeks to ensure that new development makes adequate provisions for the protection and enhancement of Green Infrastructure.

Consideration of Policy

- 11.2 TW acknowledges the importance of providing an appropriate amount of green infrastructure to support new development and broadly supports the provisions as set out in Policy LPA09.

- 11.3 TW supports the provision of Part 1 and 2 but would note that this cannot conflict with the Council's requirement to increase housing density (Policy LPA05) where Green infrastructure would result in a significant loss of developable areas of sites.

- 11.4 TW would note in respect of Part 4, any funding as required to provide compensation for the loss of green infrastructure assets will need to comply with CIL Regulations.

} (12)

Tests of Soundness

- 11.5 TW considered Policy LPA09 to be sound. ✓

Recommended Change

- 11.6 TW considers that no further change to the policy is required. ✓

PO3464

269

Ref: LPSD
01 MAR 2019
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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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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>Stacy Manley</u>	First name: _____
Last Name: <u>Manley</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.

Would you like to be kept updated of future stages of the St Helens 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? HA- HS							
Policy LPA08 LPA09 LPA11 LPA12 LPA04	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input 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 <u>set out</u> your comments.
<p>no infrastructure for ex-council house / no schools doctors / dentist to support / use Ashkan as the doctors could never give appointments 2 weeks there are 500 more gangs to help cost of child to go to Wilson School as none in Area SK - St Helens policy not to build any more (500 jobs child & more) Junction 23 cant support 1 travel to Manchester it would cause extra hour of hours to an already long drive / which also increase pollution & health and mental health issues it will cause this Junction has taken the biggest hit all around Haydock and it will continue to decline if more buildings is done</p>

Please continue on a separate sheet if necessary

Brexit require us grow own, so grade 2 fields
 are needed to supply food - **LOAN** figures don't support
 cancel figures

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.

- Infrastructure in place for existing houses
 - schools to be built + floodings to be rectified - provisions for increase of pollution on health of community!
 - train station to be upgraded to acomoder Prans / Disabled /
 - Brown field sites to be exhausted. Still a lot available which are not being used.
 - Mental Health provisions as decrease in Greenbelt ~~will cause depression~~

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

PO3465

PF1347



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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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: 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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Yes (Via Email)

No

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

RETURN DETAILS

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St.Helens Council
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.

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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
LPA09							
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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Please continue on a separate sheet if necessary

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Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel HA4/GBL074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helier Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

Foreword and additions for the May 2019 representation:

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

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

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

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

For the May 2019 representation it should be noted that:

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

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

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

"Likely to generate negative effects" for

SA1. To protect and enhance biodiversity

SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.

These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

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

02

1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat.
This is significant.

03

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

04

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

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:

2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).

05

2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.

2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.

2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

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

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

"Likely to promote positive effects "

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

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

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

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

However:

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

PO3466

PF 1347



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

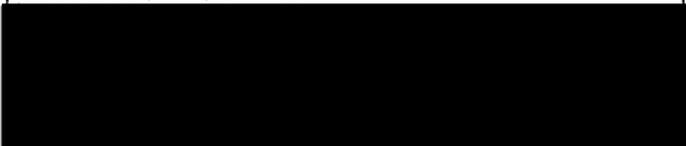
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

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

1428
13 MAY 2019 6:02 AM 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"/>

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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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.

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LPA09							
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 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

Please continue on a separate sheet if necessary

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

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel HA4/GBL 074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helier Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

Yes, I wish to participate at the oral examination

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.

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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.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

However:

- 3.2. There are no recommendations as to how this could be achieved.
-
- 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
- 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS. 06
- 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.
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 - The remaining Bold Forest Park GI does not have infinite capacity.
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- 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09
-
- 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;
-
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- 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park. 10
- 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.
-
5. The Bold Forest Park AAP (adopted July 2017) states that:

“If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated.”

5.1. It has been argued throughout this document that the 2016/2017 LAP’s proposals to remove some of HA4’s constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11

5.2. The AAP recognises that *“There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping.”*

- However, these properties surround and/or are part of GBP_074/HA4.
- Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
- The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist. 12

5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *“Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling.”* The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *“3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park...”* 13

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *“...has a strong boundary to the east ...”* *“...includes old coal mining buildings...”* *“...and a new development...”* 14

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer’s side of the footpath, there is a ditch.

PO3467

PF1348



St. Helens
Council

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Representation (i.e. Comment) Form**

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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.

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Yes (Via Email)

No

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Town Hall
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St.Helens
Merseyside
WA10 1HP**

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

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

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

[Empty box for response to question 9]

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

1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03
This is significant.

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

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

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:

2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).

2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use. 05

2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.

2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

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

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

"Likely to promote positive effects "

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

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

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

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

However:

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

PO3468

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

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

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		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LPA09							
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

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

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel HA4/GBL074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helens Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

[Empty box for response to question 9]

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

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

Please keep a copy for future reference.

Foreword and additions for the May 2019 representation:

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

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

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

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

For the May 2019 representation it should be noted that:

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

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

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

"Likely to generate negative effects" for

SA1. To protect and enhance biodiversity

SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.

These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

However:

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

“If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated.”

-
- 5.1. It has been argued throughout this document that the 2016/2017 LAP’s proposals to remove some of HA4’s constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11

-
- 5.2. The AAP recognises that *“There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping.”*

- However, these properties surround and/or are part of GBP_074/HA4.
- Removal of HA4 from the Green Belt and its consequential development directly affects these establishments. 12
- The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.

-
- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *“Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling.”*
The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *“3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park...”* 13

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

- 6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

-
- 6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *“...has a strong boundary to the east ...”*
“...includes old coal mining buildings...” *“...and a new development...”* 14

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer’s side of the footpath, there is a ditch.

PO3469

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 - IDP

⑧ - LPA07

⑨ - LPA09

⑩ - LPC05

⑪ - LPC06

⑫ - LPC07

⑬ - LPC08

⑭ - LPC09

This Representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/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

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

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

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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:

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

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 unsound, is it because it is not:

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

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

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

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

Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA09: Green Infrastructure

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

The 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/Gorse 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 LPA09: Green Infrastructure

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA09 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy. The Bold Forest Park Area Action Plan, as adopted by St Helens Council July 2017, and listed in the Local Development Scheme 2018-2021¹ as an adopted development plan document should play a key role in guiding decisions.

Green infrastructure as laid out in Policy LPA09, 'comprises a network of multifunctional natural assets, including green space, trees, woodlands, moss lands, grasslands and wet lands.'

All these assets can be found within the Bold Forest Park. An Ecological Network Development report was completed as part of the Area Action Plan, which identified 51 sub-areas within the Park and produced several recommendations, 'consisting of specific measures for each of those smaller areas.'² The report was key in helping to define and instil the aims, objectives and policies of the Bold Forest Park Area Action Plan, most notably in relation to those dealing with delivery of green infrastructure and the ecological network.

'Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.'

Objective 5 of the Area Action Plan is to:

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

² Bold Forest Park Ecological Network Development, Daan Liebrechts, 2013, Page 33

‘Enhance the natural environment through targeted delivery of green infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park Area.’

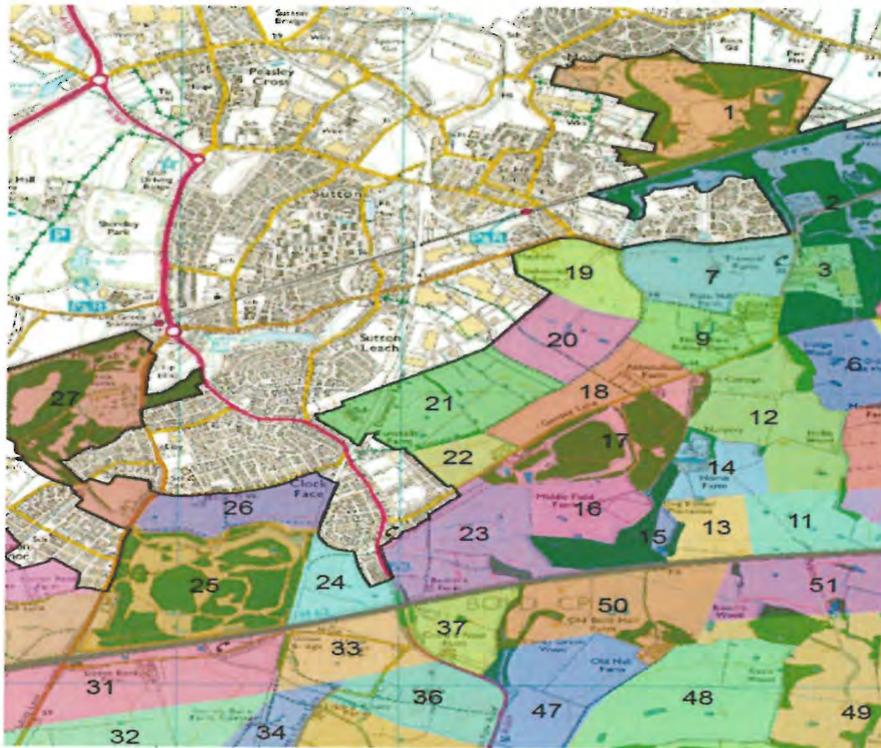
The Bold Forest Park Area Action Plan Policy BFP ENV2: Ecological Network

St Helens Council will within a woodland and farming framework enhance biodiversity in Bold Forest Park by developing an ecological network which reduces habitat fragmentation and increases the resilience of wild life in the forest park by:

1. Identifying and safeguarding sites of importance for biodiversity and geological conservation
2. Identifying and safeguarding priority habitats including unimproved grassland, ponds and wetlands, hedgerows and field margins
3. Identifying and safeguarding priority species including – great crested newts, corn bunting, brown long eared bat, noctule bat, myotis sp bat, pipistrelle bat, water vole, skylark, grey partridge, lapwing, brown hare
4. Increasing connectivity between priority habitats (as listed above), by creating corridors and stepping stones.

Policy LPA09 of the Local Plan puts the burden on developers to, ‘Ensure that development proposals on strategic employment and housing sites incorporate holistic green infrastructure plans.’ The Plan does not provide any guidance as to how this policy will be met or measured to ensure it has been achieved. Specifically, in relation to sites 4HA and 5HA, there is no reference to the Bold Forest Area Action Plan. The Local Plan fails to demonstrate how the Aims, Objectives and Policies as set out in the Area Action Plan will be met and does not provide an explanation as to why the recommendations as set out in the Ecological Network Development report have been rejected.

The Ecological Network Development report identified 5 sub-areas within the area known as 4HA within the Local Plan. Site 5HA was covered in full by one sub-area of the Forest Park.

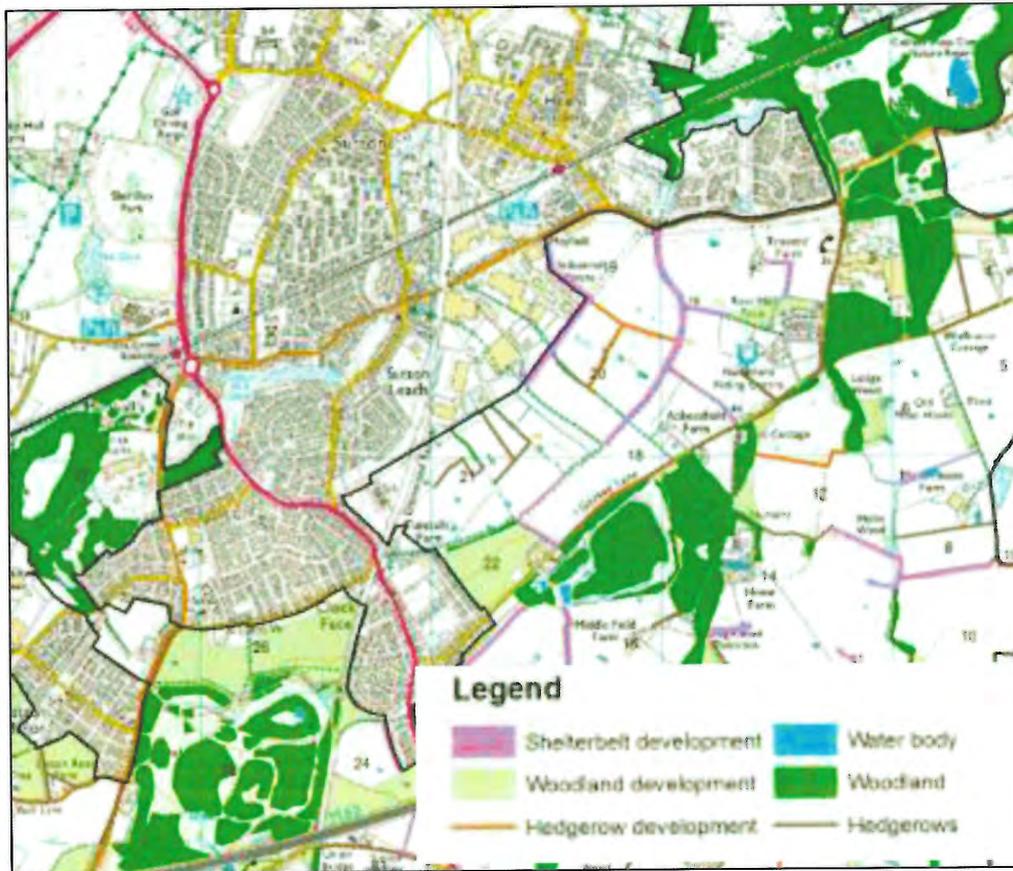
Figure 1. Identified Areas³

Area 4HA covers a patchwork of habitats including hedgerow and field margin, ponds (including pond clusters), woodland, unmanaged grassland, permanent grassland both grazed and un-grazed, arable farmland and an LWS at Tunstalls Farm. Many of these are considered priority habitats, as such should be safeguarded. This mix of land uses was not considered in the Green Belt Review 2018, as stand-alone habitats and as part of the Bold Forest Park, which makes the results of the review flawed and unreliable and therefore cannot be used to justify the removal from Green Belt. The Bold Forest Park Area Action Plan stated, *'a key to conserving and increasing wildlife in Bold Forest Park, is to reduce habitat fragmentation by increasing connectivity, especially in the farmland landscape.'*⁴ The recommendations in the Ecological Network Development report showed this can be achieved through the 4HA site. The recommendations included increasing the network of hedgerows and field margin and expanding the woodland planting to link the woodland sites. Development of 4HA would be in direct conflict with the Forest Plan, failure to adopt the recommendations in the Ecological Network Development report has the potential to result in the loss, fragmentation or isolation of priority habitats within the Forest Park.

³ Bold Forest Park Ecological Network Development, Page 34

⁴ Bold Forest Area Action Plan, Adopted 2017, Page 16

Figure 2. Woodland Framework Model for Bold Forest Park Ecological Network



Natural England National Character Area Advice for the Lancashire Coal Measures (NCA 59) identifies mining and agriculture as major influences on landscape character of the character area which includes St Helens and Bold. Specific opportunities identified to protect and enhance the local character include – supporting the agricultural landscape by expanding the habitat networks of grassland, woodland, ponds and hedges.

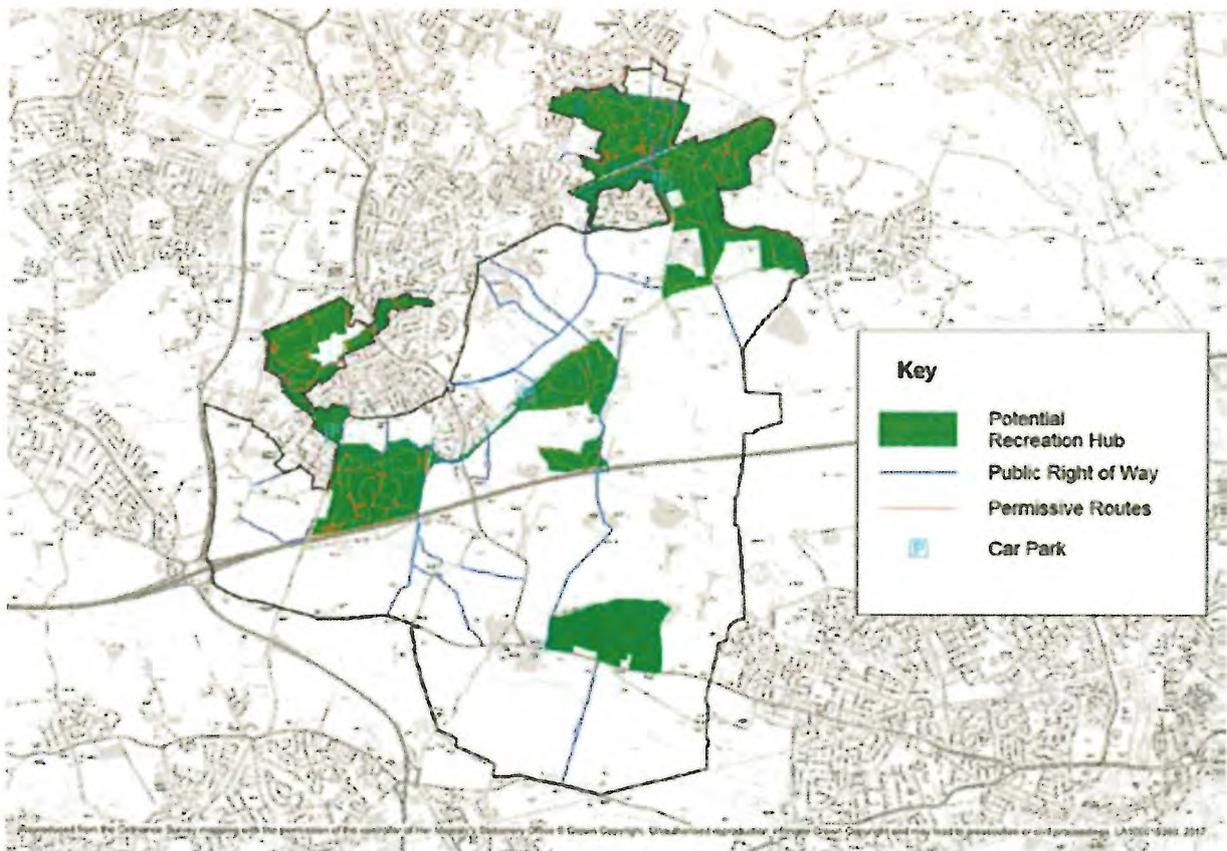
The Local Plan Policy LPA09 states, ‘Developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites.’ The Local Plan however does not make clear how this will be achieved on developments, such as 4HA, that may take decades to complete and include a large number of developers and land owners. Green infrastructure may cross a number of boundaries in terms of developer responsibility. The master plan for the Green Infrastructure and ecology network, should be demonstrated within the local plan, especially for sites 4HA and 5HA as areas within the Bold Forest Park, to ensure cohesion and that there is no fragmentation or isolation of important sites and to demonstrate a net biodiversity gain with a long-term management plan.

The Bold Forest Park Area Action Plan Policy BFP SN1: Meeting the development needs of the borough in a manner appropriate to the forest park, states development must, 'Not result in the loss of critical infrastructure elements of the forest park or prevent their implementation'

'The critical infrastructure elements referred to in Policy BFP SN1 are the recreation hubs and strategic linking routes (the key walking routes, cycle way network, existing bridleways and proposed bridleway).'

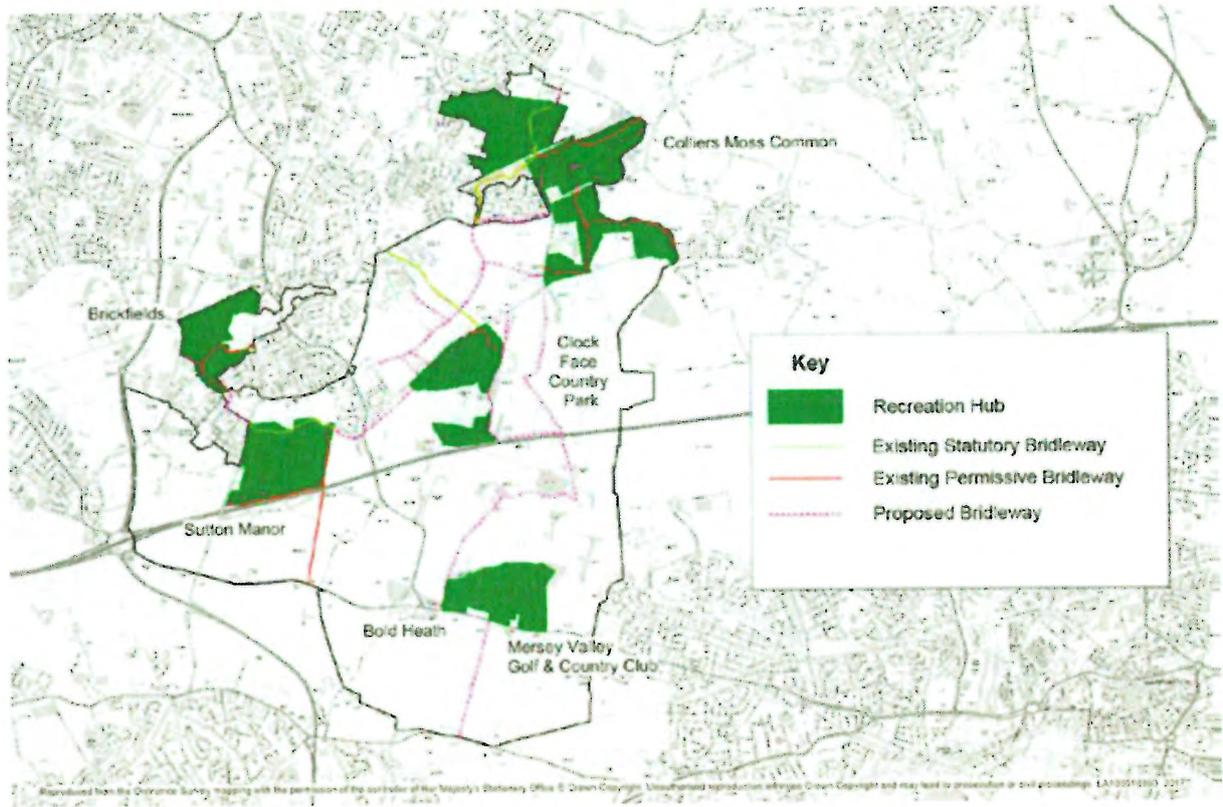
Site 4HA is criss-crossed by a number of PRow (incorporating Bold Loop a Mersey Forest Trail), Bridleways and proposed Bridleways. Development of these sites would compromise the ability of people to access these routes. Care also needs to be taken to ensure the Ecological Network Development does not compromise these vital access routes and likewise the routes do not compromise the Ecological Network. As a result, greater land area and buffer zones are essential to accommodating both routes and network. As a result, the deliverable area within site 4HA would be significantly reduced. This was not considered as part of the GBR 2018. Therefore, the results of the review are flawed and unreliable and cannot be used to justify the removal of the sites from Green Belt.

Figure 3. Current Forest Park Infrastructure⁵



⁵ Bold Forest Park Area Action Plan, Adopted 2017, Page 27

Figure 4. Existing and Proposed Bridleway Network⁶



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

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

Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPC08: Ecological Network

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)

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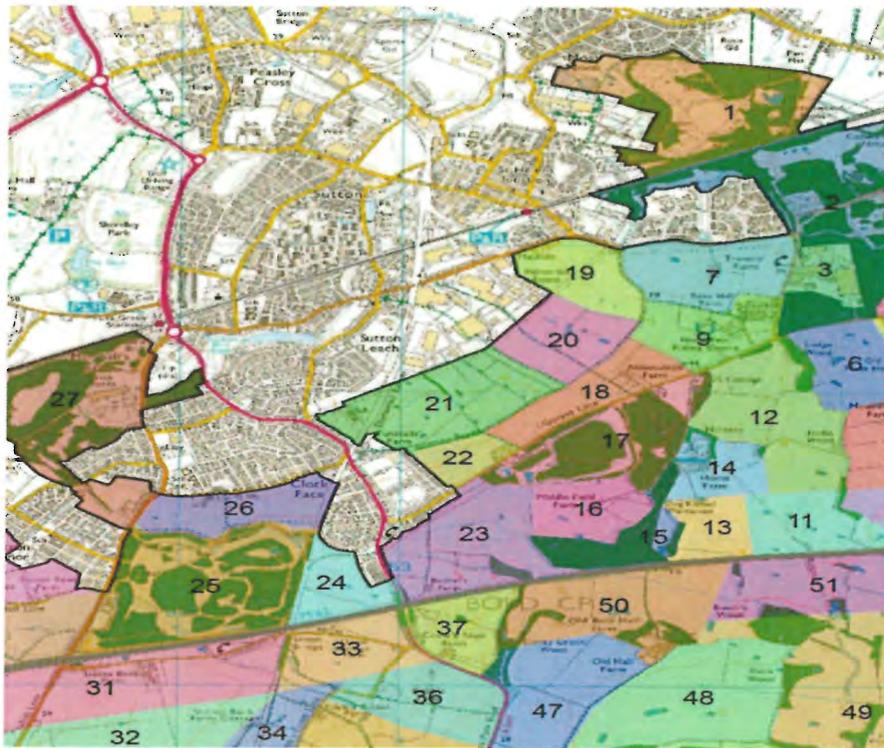
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

Figure 1. Identified Areas³



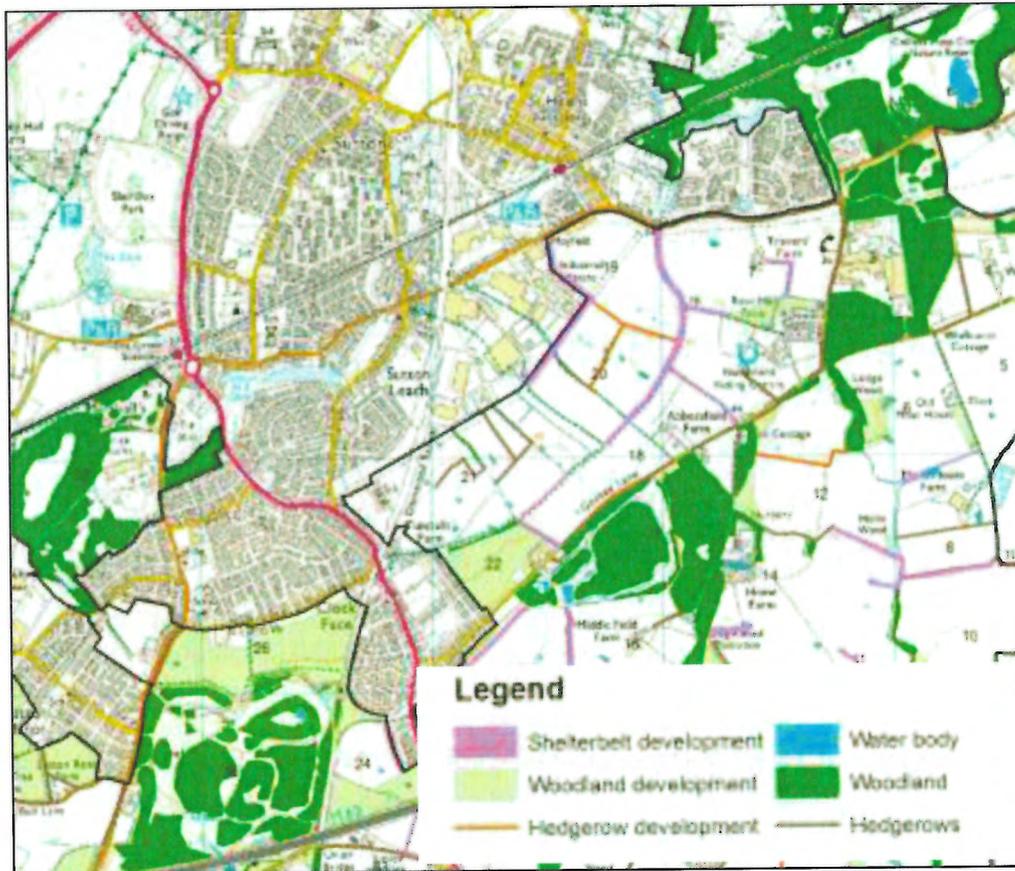
Area 4HA covers a patchwork of habitats including hedgerow and field margin, ponds (including pond clusters), woodland, unmanaged grassland, permanent grassland both grazed and un-grazed, arable farmland and an LWS at Tunstalls Farm. Many of these are considered priority habitats, as such should be safeguarded. This mix of land uses was not considered in the Green Belt Review 2018, as stand-alone habitats and as part of the Bold Forest Park, which makes the results of the review flawed and unreliable and therefore cannot be used to justify the removal from Green Belt.

The Bold Forest Park Area Action Plan stated, '*a key to conserving and increasing wildlife in Bold Forest Park, is to reduce habitat fragmentation by increasing connectivity, especially in the farmland landscape.*'⁴ The recommendations in the Ecological Network Development report showed this can be achieved through the 4HA site and 5HA. The recommendations included increasing the network of hedgerows and field margin and expanding the woodland planting to link the woodland sites. Development of 4HA and 5HA would be in direct conflict with the Forest Plan, failure to adopt the recommendations in the Ecological Network Development report has the potential to result in the loss, fragmentation or isolation of priority habitats within the Forest Park.

³ Bold Forest Park Ecological Network Development, Page 34

⁴ Bold Forest Area Action Plan, Adopted 2017, Page 16

Figure 2. Woodland Framework Model for Bold Forest Park Ecological Network



PO3470

Doub

EFO069



St Helens Local Plan Formal Consultation Response
Sayce, Stephen
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:37



2 Attachments



Part A Form.pdf PART B Representation Form.pdf

Dear Sir / Madam
Please find attached our formal response/representation.
Kind Regards

Steve Sayce
Planning Advisor

The Environment Agency
Sustainable Places (Liverpool City Region)
Richard Fairclough House
Knutsford Road
Latchford, Warrington
Cheshire
WA4 1HT



Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!

If you are planning a new project or development, we want to work with you to make the process as smooth as possible. Early engagement can improve subsequent planning applications to you and your clients' benefit and deliver environmental outcomes. For a cost recovery fee of £100 per hour + VAT we will provide you with a project manager who will coordinate all meetings and reviews in order to give you detailed specialist advice with guaranteed delivery dates. More information can be found on our website [here](#).



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BE PREPARED**

#floodaware

Creating a better place
for people and wildlife



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We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or fo.
Click [here](#) to report this email as spam

- ① - LPA09
- ② - LPA06
- ③ - LPC12 - part 7
- ④ - LPC12 - part 8
- ⑤ - LPC12 - para 7.24-1
- ⑥ - LPD 01
- ⑦ - LPC 14
- ⑧ - SA - para 7.58
- ⑨ - SA - APPENDIX 5



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Sayce	Last Name:
Organisation/company: The Environment Agency	Organisation/company:
Address: Richard Fairclough House Knutsford Road Latchford Warrington WA4 1HD	Address: Postcode:
Postcode: [REDACTED]	Tel No:
	Mobile No:
	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.

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	LPA09	Paragraph / diagram / table	4.31	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

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

Please tick as appropriate

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

Policy LPA09: Green Infrastructure states;

2. The Council will work with other organisations where necessary to:

e) reduce the risk of flooding, improve river water quality and riverine and riparian habitats within the Sankey Catchment;

This should be wider than only the Sankey catchment.

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.

We suggest minor modifications to the wording so that paragraph 2.e) relates to all catchments and not just those related to the Sankey (eg, Penketh Brook)

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

PO3471



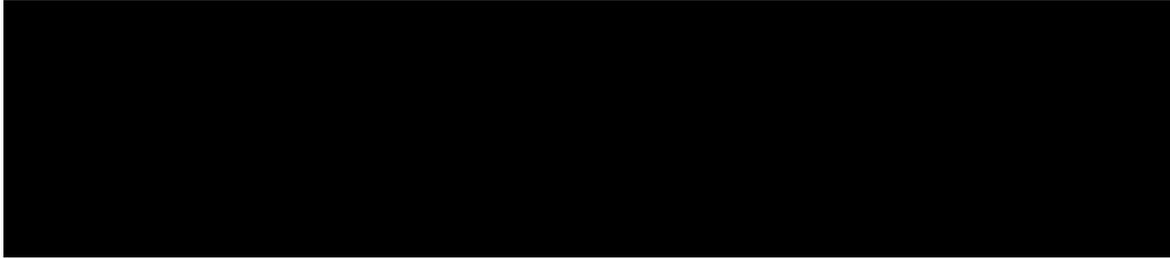
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



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

Dear Sir / Madam,

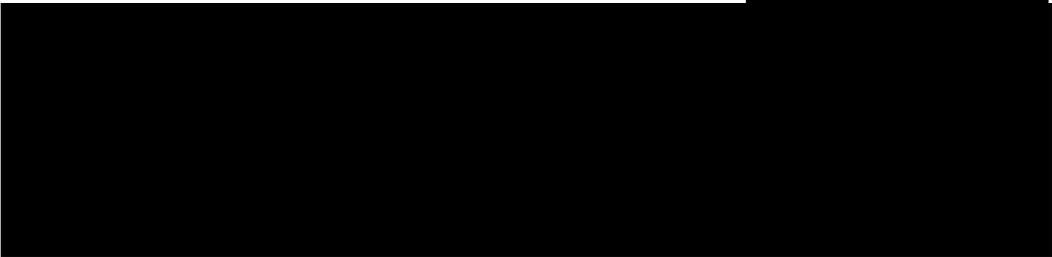
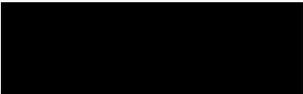
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

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

Kind regards

Ian Gilbert

Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

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

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

Council is currently seeking to secure. On this point, we consider that it is unnecessary for the Council to make reference to CIL Charging within its Local Plan unless there is an intention to utilise such measures. 48

3.50 In its current drafting, Part 2 of the Policy would allow the Council to require S.106 Contributions to meet the needs of a wider area for contributions that would not directly relate to the development in scale or kind. Such contributions would fail the tests of the NPPF and CIL Regulations for developer contributions and as such Policy LPA08 should be redrafted to ensure no such contributions can be required. 49

3.51 The hierarchy approach identified within Policy LPA08 sets out situations where financial contributions are required. These include i) contributions essential for public safety or minimum acceptable level of design; ii) necessary to address local infrastructure requirements or to provide affordable housing; and, iii) any remaining contributions. We do not consider this approach to be fully justified. 50

3.52 We consider it to be unnecessary to take this approach, because any required financial contributions can be dealt with by way of a negotiated Section 106 contribution; with such a sequential approach to those negotiations being unnecessary.

3.53 We do however support the policy allowance for viability assessments to be submitted with planning applications to establish the required level of developer contributions effect on viability. We do suggest that the policy is explicitly worded to state that developer contributions can be reduced in such situations. 51

Policy LPA09 – Green Infrastructure

3.54 Whilst our Client supports the maintenance and enhancement of Green Infrastructure of recognised value, we consider that the above policy must not designate equal importance to all green areas. It is vital that in relation to both plan making and decision making have regard to evidence in relation to the amenity and ecological value of Green Infrastructure. Not all Green Infrastructure will be of equal value and indeed worthy of the same mechanisms of protection as other sites (as demonstrated through the Council's allocation of greenfield sites for development within the Local Plan. 52

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

52

53

Policy LPC01 – Housing Mix

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

54

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

55

Policy LPC02 – Affordable Housing Provision

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

56

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

57

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage

58

PO3472

① - LPA09



{In Archive} RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft
Tim Bettany-Simmons
to:
planningpolicy@sthelens.gov.uk
04/02/2019 11:09

② - LPB01

③ - LPA11



Dear Sir/Madam

Thank you for your consultation on the St.Helens Borough Local Plan 2020-2035 Submission Draft. We previously commented on the document at Preferred Option stage. Having reviewed the plan we have the following comments:

Page 63 – Para 4.32, Policy LPA09 – Green Infrastructure

We support the thrust of this policy. Although the policy does not specifically mention the canal, it is noted that the supporting policy justification mentions about developing the Sankey canal corridor as a multi-functional green corridor. We support this aim, pending any long term ambitions of the Sankey Canal Partnership to see the canal restored.

] ①

Page 74 – Para 5.1, Policy LPB01 – St Helen Town Centre,

We support the thrust of this policy and in particular criteria 7 which links in with policy LPA09 – Green Infrastructure.

] ②

Page 120 – Para 7.21.14 – makes reference to the Sankey Canal Restoration Society and working in partnership with them (along with others). The Trust supports canal restoration as a whole and the ambitions of the Sankey Canal Partnership to see the canal restored.

] ③

I hope that the above points can be taken into account.

Kind regards
Tim

[Redacted]
Area Planner / Cynlluniwr Ardal

[Redacted]
[Redacted]
[Redacted]

Canal & River Trust / Glandwr Cymru,
Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP

From: [Redacted] On Behalf Of planningpolicy@sthelens.gov.uk
Sent: 18 January 2019 17:34
To: planningpolicy@sthelens.gov.uk
Subject: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft

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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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

PO3473

EFO043



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

Victoria Vernon

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:37

Hide Details



1 Attachment



SP_19_00000483_St Helens LP_lpsd-representation-form..doc

Dear



Please find attached Sport England's comments to the above consultation,

Kind regards,

Victoria Vernon BSc (Hons) MA

Trainee Planner



- ① - LPA05.1
- ② - LPA09
- ③ - LPC05
- ④ - LPD03
- ⑤ - LPA03



This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Erin Stephens, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Victoria	First name:
Last Name: Vernon	Last Name:
Organisation/company: Sport England	Organisation/company:
Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester,	Address:
Postcode: LE11 3QF	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] **Date:** 11/03/19

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

LAP05.1 – Sport England supports the removal of 7HA & 13HA from the Local Plan. However, it has also come to light that further sites allocated are not policy compliant. Both 2HA and 10HA include land that is defined as playing field.

An objection is made to these allocations as they would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. While the Council may have plans to relocate the facilities on both

①

sites as part of the developments this has not been clarified in the policy and no replacement sites have been identified. The loss of the facilities without replacement has not been justified by the Council's evidence base which demonstrates the sites are not surplus to requirements. As these sites contain important sports facilities which serve the community in the area, the loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF.

Consequently, at this stage, Sport England would object to the potential allocation of this sites for residential unless (in accordance with Government policy) off-site replacement playing field provision was made to mitigate the impact through confirmation in the policy that the facilities will be replaced with equivalent or better replacement facilities in terms of quantity and quality prior to commencement of development and the proposed replacement sites are identified in the plan to provide certainty.

The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date should these sites remain allocated for development which may affect the delivery of the allocation, it is advised that discussions take place with Sport England before this site allocation is confirmed in the submission version of the Local Plan. Further advice can be provided on how our concerns could be potentially addressed as well as advice on how to avoid some of the problems experienced by other local authorities who have allocated playing fields for development in their local plans.

LPA09 – This policy refers to the council's Green Infrastructure provision.

Para 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the council's evidence base. The council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the council's open space study 2016 concluded that there is sufficient quantity of open space.

This part of the policy also provides a link to the open space standards in policy LPC05. However, policy LPC05 quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As Green Infrastructure includes playing fields it is important that policy LPA09 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

LPC05 - Table 7.1 referred to in policy LPC05 (part 2) quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

As stated above, local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space

LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

Please continue on a separate sheet if necessary

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

LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.
<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy.

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want

to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities."

3

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.

4

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 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.**

PO3474

EF0008



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

- ① - LPA02
- ② - FIGURE 4.1
- ③ - FIGURE 4.2
- ④ - LPA04.1
- ⑤ - LPA10
- ⑥ - APPENDIX 5



9 Attachments

-  [lpsd-representation-form Policy LPA02.pdf](#)  [lpsd-representation-form Policy LPA04.1.pdf](#)
-  [lpsd-representation-form Policy LPA04.pdf](#)  [lpsd-representation-form Policy LPA10.pdf](#)
-  [lpsd-representation-form Appendix 5.pdf](#)  [Parkside Masterplan red.pdf](#)  [Parkside Rail Safeguarding red.pdf](#)
-  [FPC-ARP-XX-XX-FN-RX-00001 red.pdf](#)  [2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf](#)

Dear Planning Policy

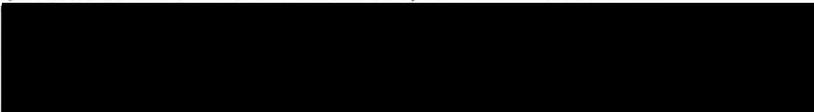
Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

Kind regards
WILL MULVANY
Associate: Chartered Town Planner
BSc (Hons), MA, MRTPI



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



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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: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Parkside Regeneration LLP	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB



Signature: 	Date: <input type="text" value="4 March 2019"/>
--	---

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

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

Yes (Via Email) No

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04	Paragraph / diagram / table		Policies Map	√	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

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

It is considered that the Local Plan is sound and legally compliant in principle in respect of draft Policy LPA04: A Strong and Sustainable Economy. In particular, our client supports the importance of providing sufficient land to meet the economic growth needs for St Helens. This includes the allocation of land at the former Parkside Colliery (Policies Map reference 8EA – Parkside West) as a transformational employment opportunity that will make a major contribution to the economic development of St. Helens Borough, the Liverpool City Region and beyond.

As we outline in respect of Policy LPA10, our client **conditionally objects** to the Policy as it identifies at footnote 18 to the supporting text, to 5.58 Ha of land to be safeguarded on the Parkside West site to facilitate a potential future rail reversing leg in respect of site 7EA.

Detailed technical work has been undertaken to set out the required safeguarded area to meet this future rail-related need. The current alignment of the safeguarded area as identified in the Local Plan Policies Map (and related figures and plans within the document itself) is erroneous and needs to reflect the alignment as submitted in the currently live planning application Ref. P/2018/0048/OUP and justified accordingly. We attach supporting information in this regard to this representation and to the representations to Policy LPA10.

5

Please continue on a separate sheet if necessary

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

Amend the reference to the rail leg safeguarding area in the supporting text and as identified on the Policies Map to reflect the correct alignment as promoted and justified by the site owner.

Amend the relevant site area stated for this element to reflect the correct land safeguarding requirement.

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:

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the employment strategy and site specific considerations such as the rail safeguarding area for site 7EA, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector.

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA10	Paragraph / diagram / table		Policies Map	√	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

It is considered that the Local Plan is sound and legally compliant in principle in respect of draft Policy LPA10: Parkside East (site 7EA) and the significant economic benefits that future development may deliver here.

However, the Policy identifies 5.58 Ha of land to be safeguarded on the Parkside West site to facilitate a potential future rail reversing leg in respect of delivery of site 7EA. Detailed technical work has been undertaken to set out the required safeguarded land to meet this future need. The current alignment of the safeguarded area as identified in the Local Plan Policies Map (and related figures and plans within the document itself) is erroneous and needs to reflect the alignment as submitted in the live planning application Ref. P/2018/0048/OUP and justified accordingly. We attach supporting information in this regard to this 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.

The policy wording is sound, but part of the Policy relates to the rail leg safeguarding area for Parkside East (Site 7EA) that would need to be provided on Parkside West (Site 8EA). The alignment of this is incorrectly shown on the Policies Map as this has been the subject of a more detailed analysis by the site owners Parkside Regeneration LLP and is set out as part of an outline planning application. This information is provided as part of these representations.

There is a need to amend the Policies Map to reflect the correct rail leg safeguarding area requirement.

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:

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the employment strategy and site specific considerations such as the rail leg safeguarding area for site 7EA, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector.

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

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

Your ref
Our ref 237135-00/SMS/JL
File ref CO

ARUP

10th Floor The Plaza
100 Old Hall Street.
Liverpool L3 9QJ
United Kingdom

[REDACTED]
Langtree Property Partners
St James Business Centre
Wilderspool Causeway
Warrington
WA4 6PS

[REDACTED]
www.arup.com

14 September 2018

Dear

**Former Parkside Colliery
Comments on AECOM Review of Developers Rail Corridor Proposals**

Thank you for sending us a copy of the AECOM Technical Note (Ref: 60565669-AEC-PARK-TN-1010) dated 24 May 2018, we have reviewed the Technical Note and confirm:

- a) we remain content that the safeguarded area proposed for rail sidings (as part of a SRFI) is workable and responds well to the development needs of Parkside Regeneration LLP and provides a balanced position in respect of the competing needs of a future SRFI developer;
- b) it is acknowledged that the design uses minimum design radii, we believe that these radii are manageable but clearly acknowledge AECOM's points that larger radii are 'preferable' and that mitigations will be needed;
- c) we believe that the use of words like 'bespoke componentry' to mitigate tight radius curves/ rail squeal problems is somewhat misleading as the componentry is standard 'off the shelf' equipment, specified for individual situations and locations;
- d) the increased cost of rail related mitigations was not a consideration we were asked to consider by Parkside Regeneration LLP in respect of developing the safeguarded area for a workable rail solution;
- e) whilst the proposed rail safeguarded area (and rail alignments) will involve more embankment or retaining works than the AECOM boundary, this is a matter of cost and not technical feasibility/suitability; and,
- f) further assessment of the West Coast Main Line cutting as a constraint we advise, would be an excessive level of investigation at this stage when the current exercise is related to not precluding an SRFI in the future, again mitigations to prevent loading the WCML would in the future be a matter of cost not feasibility.

We trust that this gives Parkside Regeneration LLP sufficient confidence to continue supporting the proposed safeguarded area in the development proposals.

File Note

ARUP

6th Floor 3 Piccadilly Place
Manchester M1 3BN
United Kingdom
www.arup.com

Project title	Former Parkside Colliery	Job number	237135-00
cc	Alek Gruszczynski	File reference	FPC-ARP-XX-XX-FN-RX-00001
Prepared by	Daniel Beech	Date	15 June 2017
Subject	Effect of the proposed Parkside development on the provision of an SRFI on the East Parkside site		

1 Introduction

The purpose of this technical note is to review the requirements for a strategic rail freight interchange (SRFI) and determine whether the Parkside Regeneration LLP masterplan is not prejudicial to the delivery of an SRFI on the Parkside East site as shown in the St Helens local plan 2018 – 2033.

2 SRFI Requirements

Work has been done previously by Arup to define the requirements for an SRFI based on a review of selected documents published by the UK government on the subject. The summary of this review is contained in Appendix A.

A large number of the requirements for an SRFI are operationally and commercially based and as such are not directly influenced by design. Only a small number of requirements are technical in nature, these are;

- Rail access from all mainline directions
- Size range 60 – 400Ha
- Operational rail connection, a number of rail connected buildings, intermodal handling and container storage
- Capable of handling over 4 goods trains per day
- Capable of receiving 775m long trains
- At least W8 gauge
- Trackside access/ maintenance roads

File Note

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15 June 2017

For the purpose of this note the layout of an SRFI shall be considered suitable if it fulfils the criteria listed above.

A number of the criteria above are dependent upon the mainline and therefore are not considered in this note as it is independent of the layout of the SRFI on the Parkside site. These are the gauge of the rail line and the capacity of it. An SRFI will not be capable of handling 4no. goods trains per day if there is not sufficient capacity in the surrounding rail network to accommodate these additional trains. It is considered that the SRFI on the East Parkside site will be designed such that it can handle in excess of 4no. trains per day.

Equally fulfilment of some of the criteria is based solely on the layout of the SRFI on the East Parkside site. As this is not affected by the layout of the Parkside West masterplan the requirements are not considered in this note.

Considering the above statements there are only a couple of requirements that need to be met by the sidings on the West Parkside site to allow for the provision of an SRFI on the East Parkside site. These are;

- Rail access from all directions
- Capable of receiving 775m trains

Should these requirements be met then it is considered that the layout provisions are not prejudicial to delivery of an SRFI.

3 Parkside Regeneration LLP Masterplan

The masterplan (Appendix B) created for the West Parkside site by the Parkside Regeneration LLP safeguards an area for the reversing loop/arrival siding to be used by an SRFI facility on the East Parkside site.

For this note, a drawing has been prepared (Appendix C) which compares the safeguarded area in the Parkside Regeneration LLP masterplan against the safeguarded area of the St Helens Local Plan (see below).

The area of track shown in the masterplan connects to the Manchester to Liverpool mainline, the sidings then curve around the top of the site to run parallel to the West Coast Mainline near the western boundary before curving again toward the centre of the site. This layout gives a maximum length between switches in excess of 775m and is therefore able to accommodate the required train lengths.

The area safeguarded in the masterplan makes allowance for a dual track siding that can be utilised as a reversing loop for breaking up freight trains and to receive 775m trains directly from the north & east. Trains travelling from the south & west are able to be received directly to the SRFI on the Parkside East site.

Provisions are made in this layout for earthwork bunds between the rail sidings and West Coast Mainline to provide an acoustic and visual bund to the properties adjacent to the mainline.

File Note

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An area adjacent the track has also been reserved to be utilised as a maintenance track suitable for use by a van to service both the track and trains, with allocations for turning circles and passing points at regular intervals.

A siding in this location will interrupt access to Newton House Farm whilst a train is in the siding. The area of the safeguarded land contains sufficient space to provide a level crossing designed to Network Rail standards.

The Network Rail Track Design Handbook states that curves in sidings should have a normal minimum radius of 150m with an exceptional minimum radius of 125m. All curves in the track design used to define the safeguarded area are in excess of 150m and are greater than the normal minimum radius.

The rail layout used to define the envelope of the safeguarded area in this masterplan was designed to meet the requirements of an SRFI identified in the summary document in Appendix A. The design is to normal Network Rail requirements and therefore no compromises have to be made in the operation of these sidings.

4 St Helens Local Plan

The St Helens Local Plan 2018 – 2033 (Appendix D) shows an area of the Parkside site safeguarded for use as an SRFI. It is understood that this area is defined by a rail layout designed by a third party. As this rail layout design is not available to review it is not possible to fully appraise all technical aspects of the layout and what it provides, however assumptions can be made from which some conclusions can be drawn.

The eastern leg of the sidings shown in the local plan connects to the Manchester to Liverpool mainline curving to run parallel to the West Coast Mainline. At the crossing of the Newton Park Farm access road it then enters a shallow curve into site. At the limit of this curve the land-take fans out over a large area of the site. It is unclear what this fan is required for but it may be an allowance for earthworks or a vehicle turning area, greater than had been allowed for in the Parkside Regeneration LLP safeguarded area.

The layout appears to provide around 800m of track between switches. This means it is possible to accommodate a 775m long train arriving directly to the sidings from the north and east. The curve on the track seems to be long and shallow so is likely above the 150m normal minimum radius permitted in the Track Design Handbook, although the design reasoning is unknown.

Without seeing the full design information it is not possible to fully appraise the layout however it seems that there is sufficient land-take specified to accommodate visual and acoustic bunding to shield the houses adjacent to the West Coast Mainline from the rail operations.

Although it is not possible to say for certain without seeing further information it is highly likely that the land provision shown in the St Helens local plan would provide sufficient space for an SRFI to be developed on the Parkside site.

File Note

237135-00

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5 Conclusion

Both the Parkside Regeneration LLP masterplan and the St Helens Local Plan 2018-2033 provide suitable space allocation for a siding of sufficient length to support the development of an SRFI on the East Parkside site.

As the layouts for the rail sidings used to inform the land safeguarding on both plans have been designed by different parties, likely with different assumptions and design decisions, the solutions are naturally different. That being said both designs provide layouts that meet the requirements for an SRFI as listed in the summary table in Appendix A and are designed to meet the normal minimum requirements of rail sidings as set out in the Track Design Handbook.

From this review it is considered that the land safeguarded for sidings in the Parkside Regeneration LLP masterplan is not prejudicial to the delivery of an SRFI on the East Parkside site. Additionally no compromise on the operation of the SRFI needs to be made with the delivery of these layouts.

File Note

237135-00

15 June 2017

Appendix A

Subject Summary of SRFI Technical Requirements - CONFIDENTIAL

Date 12 August 2014

Job No/Ref

237135/00/SMS

This summary of Technical Requirements for a SRFI has been prepared following a review of the following documents contained in the more detailed Arup note "Commentary on SRFI Technical Requirements" dated 30/07/2014. The review has also considered where third parties might pick at technical aspects to challenge a planning application. Documents reviewed:

- SRFI Policy March 2004, Strategic Rail Authority
- SRFI Policy Guidance November 2011
- Strategic rail freight interchanges - Written statement by the Rt Hon Justine Greening MP, Secretary of State for Transport, 29 November 2011.

SRFI Technical Requirement or Parameter	Soft Req't	Hard Req't	Commentary
Intermodal transfer and container handling.		✓	2, 31
Large multi-purpose RFI and distribution centre linked to rail and trunk road.		✓	3, 44, 46
Open access for all rail companies and road hauliers.		✓	5
Accommodates rail and non-rail businesses.		✓	4
Large scale warehousing, processing or manufacturing.		✓	11, 31, 32, 34
Rail access from both directions.	✓		16
Minimize shunting.	✓		16
Size range 40Ha to 400Ha.*		✓	18
Size in excess of 60Ha.*	✓		19
Expansion potential.		✓	22, 23
Initial stages must provide an operational rail connection, a number of rail connected buildings, intermodal handling and container storage.		✓	25, 26, 32, 33
Capable of handling over 4 goods trains per day. (handling on site and implied 4 in and 4 out movements on rail network).		✓	29
775m long trains.**	✓		37, 40, 42
W8 gauge (for 8ft 6inch high container) minimum.		✓	45
W10 gauge (for 9ft 6inch/2.9m container) preferable	✓		

* Policy has range, Guidance has in excess. (Intermodal only RFI mentioned as 10Ha to 30Ha.)

** there is an implied efficiency with larger 775m trains, 600m good target, 400m/450m sub-optimal.

File Note

237135-00

15 June 2017

Appendix C

Key

- PRLLP safeguarded area
- St Helena Local Plan safeguarded area

Notes

1. Drawing produced in support of technical note FPC-APP-00-00-000000-000000 (PRLLP) prepared in accordance with the Local Plan Safeguarded Areas (Mansfield) 21.10.18 used to show safeguarded areas.
2. St Helena Council local plan preferred options draft (pages 11-17 of 28 items)

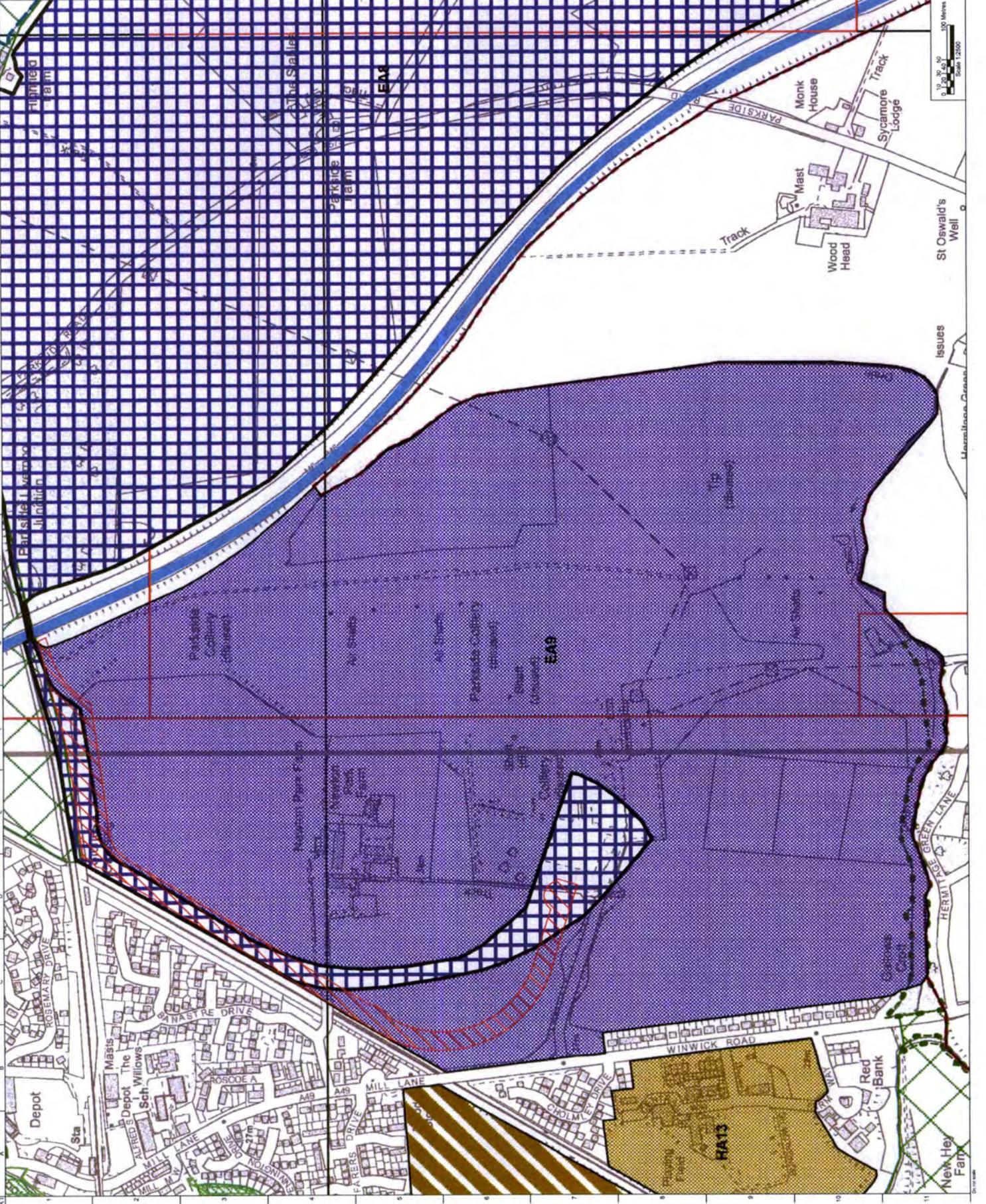
ARUP

120 Park Way, Newark, Nottinghamshire, NG24 0JN
 Tel: 01632 727 200
 Fax: 01632 727 200
 Email: arup@arup.com

Parkside Regeneration LLP

120 Park Way, Newark, Nottinghamshire, NG24 0JN
 Tel: 01632 727 200
 Fax: 01632 727 200
 Email: arup@arup.com

Project No: 237135-00
 Information
 Date: 12/09/2020
 Scale: A1: 1:2500
 Drawing No: 237135-00-00001 P1

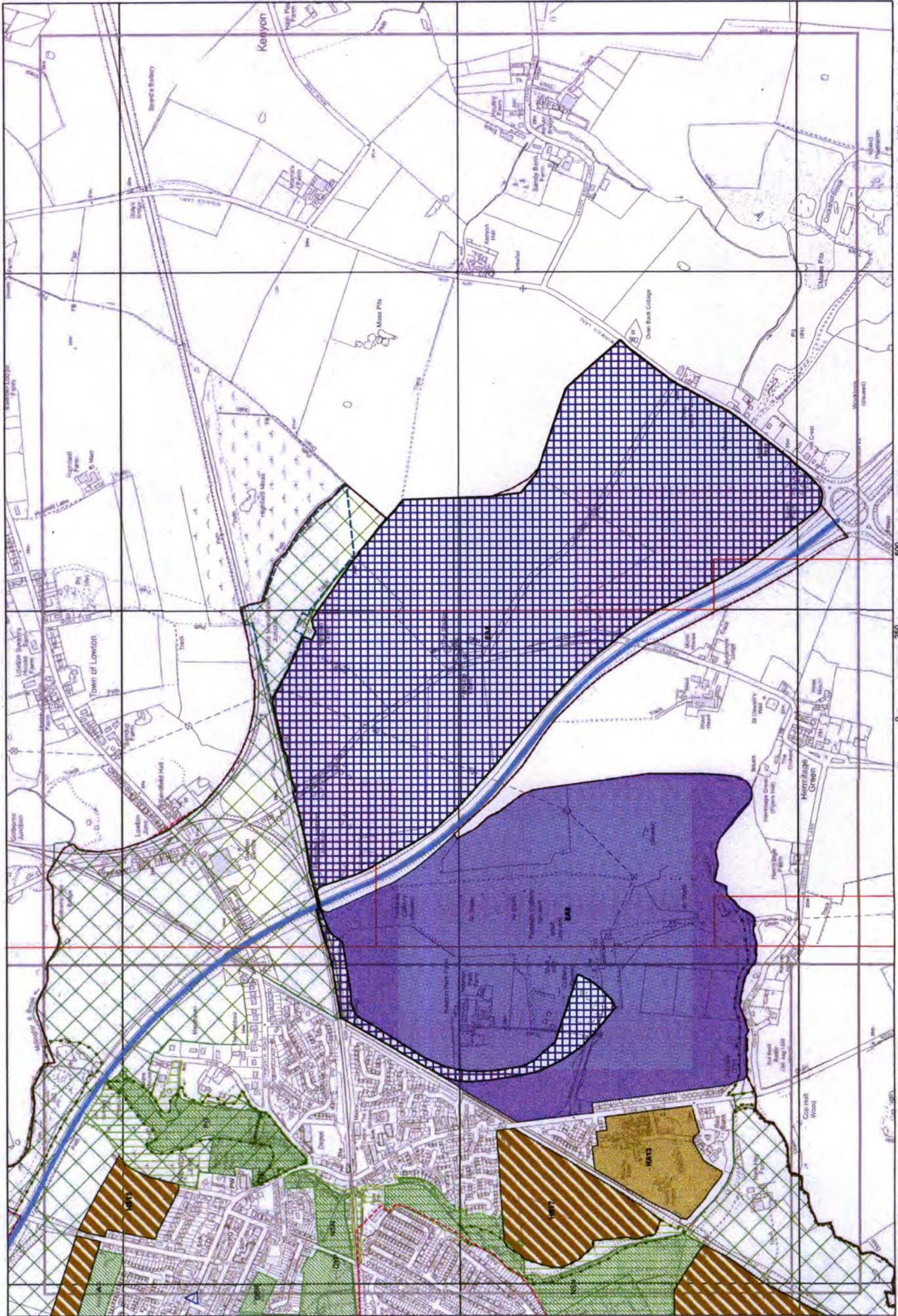


File Note

237135-00

15 June 2017

Appendix D



Centre of Plan
360950, 395030



Reproduced from the Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reuse is prohibited. All rights reserved. Ordnance Survey Licence No. 100014544. 2011

General Notes.

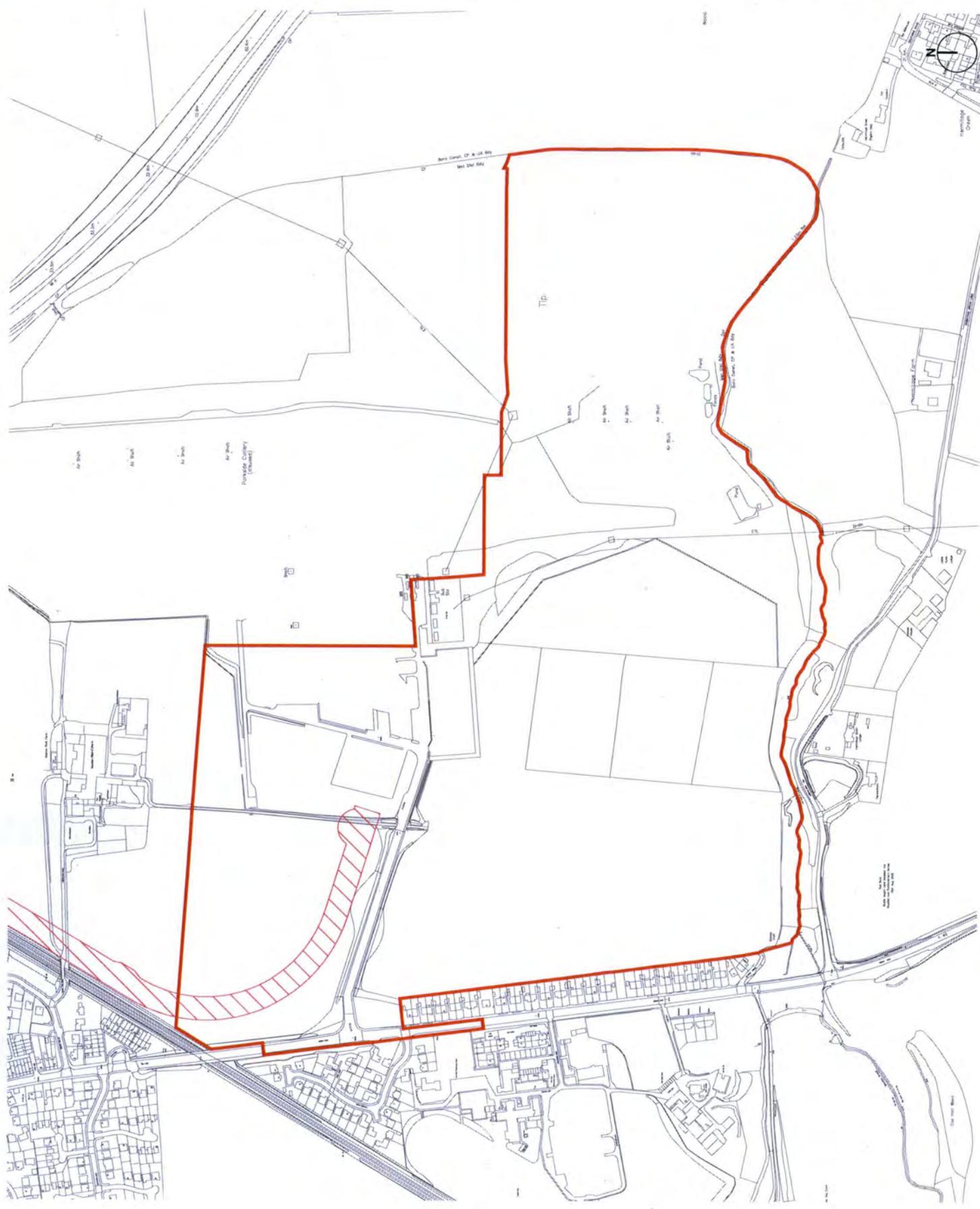
All site dimensions shall be verified by the Contractor on site prior to commencing any works.
Do not scale from this drawing.

Only work to written dimensions.

This drawing is the property of Fletcher Rae (UK) Limited (F/R) and copyright is reserved by them. The drawing is not to be copied or disseminated by or to any unauthorised persons without the prior written consent of Fletcher Rae (UK) Limited.

Phase 1 Site Boundary
Area: 118.37 Acres / 47.95Ha

Future rail lands landscaping



Revision
Scale 1:2000@A1
Station PLANNING
Drawn by AL
Date 26.05.17
Client

Parkside Regeneration LLP

Project
Parkside Colliery

Drawing Description
Phase 1 Parameter Plan

Safeguarded Rail

Drawing No. 16043_PL111

Rev. /

fletcher rae

160 Queen Street, Manchester, M15 6PQ
Tel: 0161 275 1100
Fax: 0161 275 1111
www.fletcher-rae.com
info@fletcher-rae.com

PO3475

SIR 7EA

EF0049

①-LPA10



Objection to St Helens Borough Local plan
Lane Head South Residents Group
12/03/2019 20:56

To: planningpolicy
Hide Details
From: Lane Head South Residents Group <lhsrg00@gmail.com>
To: planningpolicy@sthelens.gov.uk

1 Attachment



LPSD Representation form - LHSRG .pdf

Please find attached the Representation Form to St Helens Borough Council by Lane Head South Residents' Group Lowton.

I should be grateful if you could acknowledge receipt of the form.

Kind Regards
Kathleen Johnson
Chair LHSRG

LHSRG

Lane Head South Residents' Group

(webpage located at www.lendf.co.uk via Community Links tab)



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:
First Name: Kathleen	First name:
Last Name: Johnson	Last Name:
Organisation/company: Lane Head South Residents' Group (LHSRG)	Organisation/company:
Address: 390, Newton Road Lowton	Address:
Postcode: WA3 1JD	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: lhsrg00@gmail.com	Email:

Signature: [REDACTED]	Date: 12.03.19
------------------------------	-----------------------

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA 10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				1. Green Belt Review, December 2018 2. Employment Land Needs Study, Addendum Report, October 2017 – Amended January 2019			

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
Lane Head South Residents Group (LHSRG) represents the views of residents living in the area of Lowton to the east of and immediately adjacent to the area referred to as 'Parkside' in the St Helens Local Plan Submission Draft, January 2019 (LPSD)



LHSRG believe the LPSD to be unsound and demonstrates a failure to cooperate, in particular policy LPA10, and the evidence-base supporting documents, the Green Belt Review December 2018 (GBR) and the Employment Land Needs Study Addendum Report October 2017 – Amended January 2019 (ELNS). Justification in support of this belief is detailed below.

1. **Conflict of Interest.** By entering into a joint venture, Parkside Regeneration, with Langtree Property Partners St Helens Council has severely compromised its ability to conduct an objectively assessed needs analysis involving Parkside East and Parkside West. The purpose of a local plan is to set a vision, identify the strategic aims and objectives to support the vision and then define the policies to deliver the vision. One would not expect to see references to individual planning applications, i.e. implementation detail, in such a policy document. However, the LPSD and supporting evidence-base documents make continual reference to two planning applications, one for Parkside Phase 1 tabled by Langtree Property Partners and the other for a Parkside Link Road tabled by St Helens Council themselves. The continual referral to these, as yet unapproved, planning applications leaves the reader of the LPSD with the overriding impression of a pre-determined outcome and the LPSD written 'after the event' to support that outcome. (1)
2. **Strategic Rail Freight Interchange.** Parkside East and Parkside West are in the Green Belt and under the existing St Helens Core Strategy are protected from release except under certain special circumstances, namely and solely for use as a Strategic Rail Freight Interchange (SRFI). Under policy LPA10 of the LPSD both Parkside East and Parkside West are to be released from the Green Belt. However the special circumstance requirement and land allocation for a SRFI has been severely downgraded; Parkside West is entirely reserved for employment use (B8 warehousing) and only 60ha of Parkside East is reserved for a SRFI with the rest available for employment use. SRFIs are recognised to be of strategic national importance. They also require huge amounts of land to be effective and 60ha is defined as to be the absolute minimum requirement to be recognised as nationally significant. Given also that under LPA10 Parkside East will be divided into three parcels of land by the existing Parkside Road and the proposed Parkside Link Road, the prospects of any developer showing interest to deliver a SRFI on a minimum footprint dissected by public highways must be viewed as exceedingly slim. It is clear that the special circumstances to remove Parkside East and Parkside West from the Green Belt have not been met by LPA10. (1)
3. **Release of Green Belt.** The Green Belt Review December 2018 (GBR) recognises the contribution that Parkside East makes to the Green Belt purposes. The Stage 1B assessment of Parkside East concludes that the site has a strong sense of countryside character and openness and any development could lead to unrestricted urban sprawl. A 'High +' score at this stage should have ruled out any further assessment. However, St Helens Council took the site forward for further assessment on the basis of 'special circumstances' and concluded that Parkside East should be removed from the Green Belt. This decision has been taken despite the GBR itself identifying that "*development of the parcel for employment use would have a mixed impact on the achievement of the SA objectives. Such development is likely to have a negative effect on air quality and biodiversity, as it would generate additional HGV vehicular movements within an existing AQMA and the parcel is only 144m from a SSSI*". All of these issues have been overridden on the basis that development would benefit the local economy. This, along with the minimalist approach to provision of a SRFI, is not sufficient justification to remove Parkside East from the Green Belt. Regarding Parkside West, the GBR

recognises, as with Parkside East, that development for employment use is likely to have a negative impact on air quality and biodiversity but again concludes that Parkside West be released from the Green Belt for economic benefit. Given that Parkside West is now proposed for employment use and not a SRFI this is not sufficient justification for removal from the Green Belt. ✓

4. **Employment Needs.** The purpose of any ELNS is to conduct an analysis to determine what land might be required to support the employment needs of the local population. The ELNS that has been produced in support of the LPSD reads as a piece of reverse engineering. Rather than determine what land might be required to support the local employment need, the ELNS has been written to attempt to justify how the projected job vacancies generated by releasing 215ha of land from the Green Belt for employment use can be filled. The ELNS clearly and openly acknowledges that the St Helens borough does not have sufficient people of employment age to fill the projected vacancies. The unemployment rate in St Helens is at an all time low of 3.6% (ref: LPSD table 2.1), well below the national and regional average. The ELNS states that in order to fill the projected vacancies the unemployment rate will have to fall even further, the over 65's will have to work for longer and there will be a significant reliance on commuting in to the St Helens borough. This last point is clearly against the LPSD stated strategic objective of reducing the need to travel. The ELNS has failed to demonstrate how the over employment capacity generated by the LPSD can be met.
5. **Air Quality and Traffic Congestion.** LPA 10 is clearly promoting Parkside East and Parkside West as land for employment use, predominantly large scale B8 warehousing. Only 30% of the total site is reserved for a SRFI. Warehousing on such a large scale will generate huge HGV and LGV vehicle movements on local roads which are already heavily congested. The impact will not be in the St Helens core area but will be felt in Newton-le-Willows, Winwick, Lowton and surrounding areas. The proposed Parkside Link Road will not alleviate this impact but will just facilitate access to the local road network. There are already Air Quality Management Areas in the vicinity of Parkside and increased vehicular movement will exacerbate existing pollution issues. It should also be noted that air quality is one of the Key Sustainability Issues identified in the Sustainability Appraisal 2019. Large scale warehousing is an ill-considered and inappropriate use of Parkside West and Parkside East.

In summary LHSRG consider the LPSD and LPA10 to be a thinly disguised attempt by St Helens Council to capture as much warehousing business as possible for the purposes of revenue generation. The large scale release of Green Belt land and the impact on the local environment cannot be justified. LHSRG consider the LPSD and LPA 10 to be unsound,

- The exaggerated employment demand forcing the release of Green Belt land is not justified, not positively prepared, not effective and is not consistent with National Policy,
- The change of use of Parkside West from a SRFI strategic site to employment use is not consistent with National Policy,
- Large scale road enabled warehousing adjacent to residential areas impacting health and the environment is not positively prepared or justified.

There has also been a failure to cooperate. For many years various unsuitable developments for Parkside have been proposed and objected to by local residents, public bodies and

neighbouring authorities (Wigan and Warrington). In preparing the LPSD St Helens Council appear to have ignored or given little consideration to such objections.

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 and LPA10 should be modified to allow only appropriate developments to take place at Parkside. Appropriate developments will give due regard to the impact on local residents and the environment.

LHSRG is not against all development on the footprint of the former Parkside colliery site but request that any such development should deliver high quality employment consistent with the local need, protect the health of the local people and minimise the impact on the environment.

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:

LHSRG represent the views of a sizeable part of the community in a neighbouring authority (Wigan) that would be detrimentally impacted by the St Helens Local Plan.
There are 105 households represented by LHSRG, all of whom have been canvassed and have pledged their support to this 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.**

PO3476

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



lpsd-representation-form PAG March 2019.pdf

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/
01-11



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address: Postcode:
Postcode:	
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] _____ Date: 23 - FEB - 2019

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

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



St. Helens Council

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

Ref: LPSD
(For official use only)

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows	Address:
Postcode: WA12 0BZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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Yes (Via Email) No

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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Telephone: 01744 676190

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

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

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Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



1 Purpose

1.1 This document provides a response to the St Helens Local Plan Submission Draft January 2019.

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- Astral/Prologis Parkside Planning Applications 2006 thru 2009.
- Parkside Phase 1 Planning Application Feb 2018 & Jan 2019
- Parkside Link Road Planning Application April 2018

3 Local Plan Parkside Policy

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EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]
Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



lpsd-representation-form PAG March 2019.pdf

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/
01-11



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address: Postcode:
Postcode:	
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 23 - FEB - 2019

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St. Helens Council

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Postcode: WA12 0BZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



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02

3.5 The Submission Draft has no specific policy for Parkside West. The conditions specified in CAS 3.2 have been removed which we strongly disagree with, particularly protection of local roads from site traffic, associated impacts to air quality, and protection of local heritage (additional details provided in the summary at the end of this document).

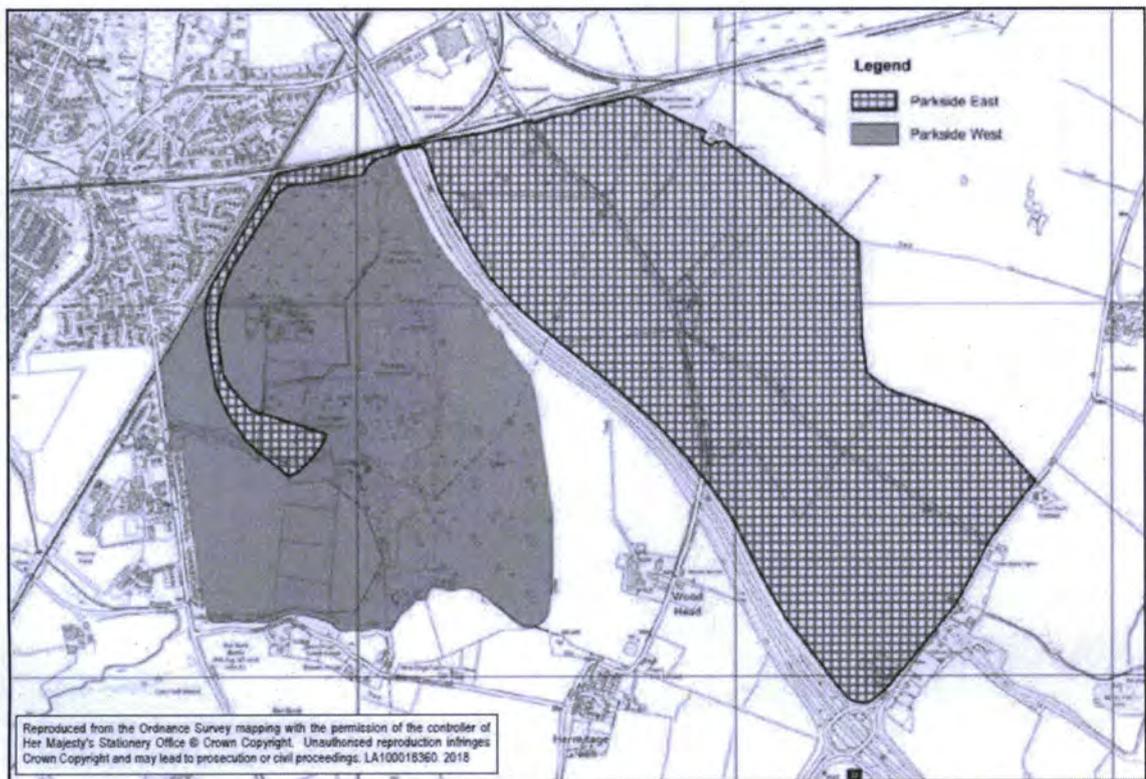
02

03

3.6 The Local Plan now specifies Parkside West as 'employment development land' rather than being set aside for use as Rail Freight Terminal. In doing so the capability for Rail Freight and Inter Model operation has in effect been at least halved assuming Parkside West is approximately the same size as Parkside East. **PAG have never supported the use of the site as a Rail Freight Terminal**, however, as early as 2006 in the North West Regional Spatial Strategy, the site was recognised as strategically important for rail freight as later supported by SHC Core Strategy Policy CAS 3.2. Of note a planning application in 2007 for 32 houses in support of Newton Park Farm refurbishment was approved by a Planning Inspector but the decision was overturned by the Secretary of State at the time because the development may prejudice a freight terminal. So why then has the Council sacrificed a significant proportion of the site for non-rail related activities in direct opposition to previous government direction? If we are to believe previous strategic documents, policies and planning decisions on this matter, Parkside as a location is of national importance and the land should be safeguarded.

03
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8EA

Parkside East & Parkside West



3.7 Turning to Parkside East this is an area of open countryside never associated with the former colliery and hard standing areas on Parkside West. Unlike the Core Strategy this is now the only land reserved by the Local Plan for a Rail Freight Terminal (other than a rail spur strip on Parkside West to allow bidirectional train traffic to access Parkside East).

3.8 In order to open up the area for development the Council have submitted a planning application for a Link Road which links the A49 with M6 J22. The Link road is touted as

03 Parkside East and only 25% of its potential for the combined area of Parkside East & West in order to accommodate warehouse development. 03

4 Summary

We would ask the inspector to examine the following areas based on our previous discussion herein:

1. Has the strategic nature of Parkside for use as a rail freight terminal been compromised?

03 a. Reduced freight terminal capability caused by not making use of the full potential of Parkside West (the actual site of the former colliery). In 2001 Rail Track produced a planning application for a freight terminal that was entirely based on Parkside West. The previous Prologis planning application in 2010 made use of both Parkside East and West and fully promoted inter-modal capabilities for the transfer of freight from road to rail. The Local Plan Draft submission makes no mention of inter-modal requirements of site occupiers for Parkside West. 03

b. Reduced freight terminal capability due to a reduction in available land from 227ha to just 60ha on Parkside East to meet further warehouse developments?

2. Does policy LPA 10 offer enough protection for the environment and impacts to the local community?

02 The currently adopted Core strategy CAS 3.2 condition 7 states '*7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

CAS 3.2 condition 9 states '*9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

02 The CAS 3.2 condition 11 states '*11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St. Helens local authority area;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

02	Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.	02
07	3. Do the ELNS employment demand calculations actually stack up? The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	LPA 04 07 Sites 7EA & 8EA
08	4. Have the Council properly considered the views of the local community? Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.	LPA 10 08 Sites 7EA & 8EA
03	4.1 PAG would ascertain that the Local Plan is unsound for the following reasons: • The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. [Not consistent with National Policy – protection of Strategic Sites]	03
07	• Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate. [Not consistent with National Policy – Green Belt Protection]	07
09	• Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts for what is proposed]	09 LPA 10 Sites 7EA & 8EA
10	• Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts]	10 LPA 10 Sites 7EA & 8EA
08	• Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council. [fails duty to cooperate]	08
11	The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	11 LPA 10 Sites 7EA & 8EA

PO3478

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

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PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



lpsd-representation-form PAG March 2019.pdf

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/
01-11



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address: Postcode:
Postcode:	
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] _____ Date: 23 - FEB - 2019

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

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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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Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Mr Richard Ward's (PAG) article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield.

We reserve the right to bring with us, others who we will identify nearer to the time, to make the case for the "Local People" before the inspector.

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

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

EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



02

3.5 The Submission Draft has no specific policy for Parkside West. The conditions specified in CAS 3.2 have been removed which we strongly disagree with, particularly protection of local roads from site traffic, associated impacts to air quality, and protection of local heritage (additional details provided in the summary at the end of this document).

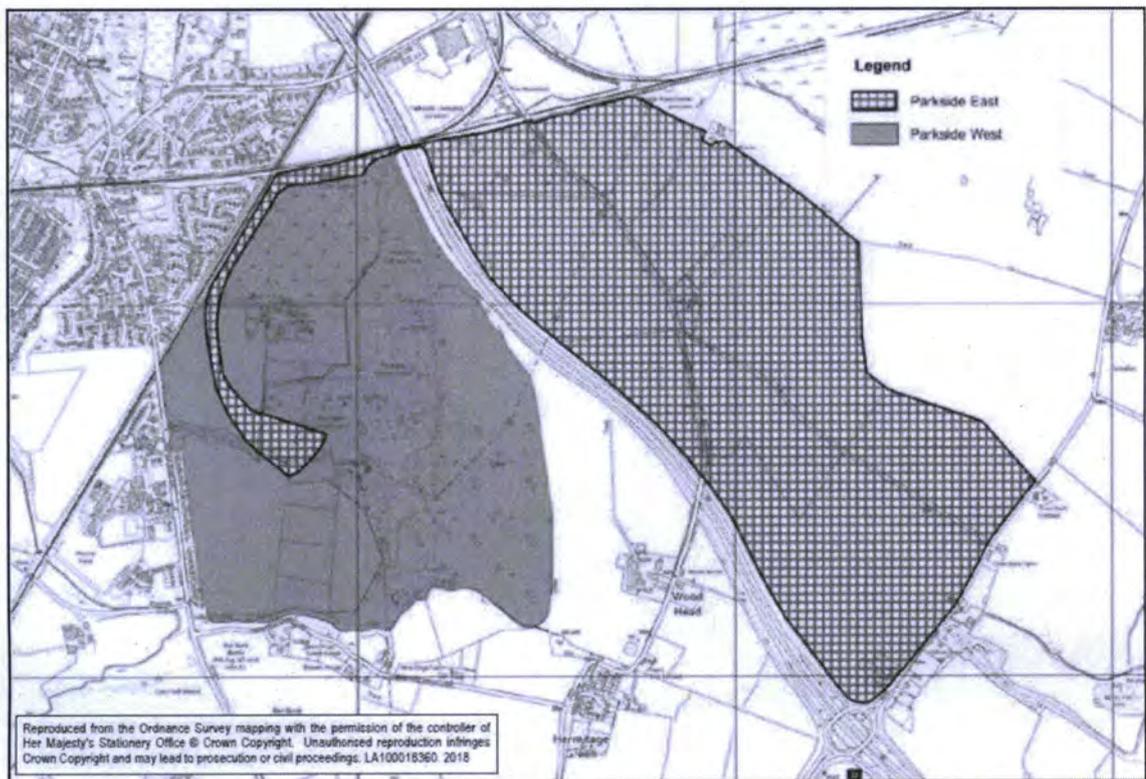
02

03

3.6 The Local Plan now specifies Parkside West as 'employment development land' rather than being set aside for use as Rail Freight Terminal. In doing so the capability for Rail Freight and Inter Model operation has in effect been at least halved assuming Parkside West is approximately the same size as Parkside East. **PAG have never supported the use of the site as a Rail Freight Terminal**, however, as early as 2006 in the North West Regional Spatial Strategy, the site was recognised as strategically important for rail freight as later supported by SHC Core Strategy Policy CAS 3.2. Of note a planning application in 2007 for 32 houses in support of Newton Park Farm refurbishment was approved by a Planning Inspector but the decision was overturned by the Secretary of State at the time because the development may prejudice a freight terminal. So why then has the Council sacrificed a significant proportion of the site for non-rail related activities in direct opposition to previous government direction? If we are to believe previous strategic documents, policies and planning decisions on this matter, Parkside as a location is of national importance and the land should be safeguarded.

03
LPA10
Sites
7SA &
8EA

Parkside East & Parkside West



3.7 Turning to Parkside East this is an area of open countryside never associated with the former colliery and hard standing areas on Parkside West. Unlike the Core Strategy this is now the only land reserved by the Local Plan for a Rail Freight Terminal (other than a rail spur strip on Parkside West to allow bidirectional train traffic to access Parkside East).

3.8 In order to open up the area for development the Council have submitted a planning application for a Link Road which links the A49 with M6 J22. The Link road is touted as

alleviating traffic for the local area, when in effect all it will do is facilitate the movement of site traffic onto the local road network. Some of the local country roads are highly unsuitable for heavy good vehicle traffic with tight bends, narrow sections, and low railway bridges subject to strikes.

- 03
- 3.9 The proposed route for Link Road also dissects Parkside East and reduces the land area for Parkside East, significantly limiting the flexibility for Rail Freight use. Of note the Link Road was never considered as part of the freight terminal topology options presented in the evidence base with the Local Plan Preferred Options stage, meaning that a very significant assumption has been made that a Freight Terminal is actually viable on Parkside East, particularly with regards to loading space, and 770m siding operation. 03
- 3.10 We also note that evidence presented with the Draft Submission states that 770m capability is a 'soft requirement'. This is a very strange assertion given that Network Rail have spent the last few years adding 770m capability to the entire UK rail network? A non 770m freight terminal would again offer reduced capability.
- 3.11 In summary the removal of Parkside West and the Link Road route have severely reduced the capability as strategic rail freight site with available land being reduced by as much 60-70% approximately in total.

04

3.12 So why has this approach being taken by the Council? The Council are looking to capitalise on the recent change from high street to internet shopping. This has generated an anticipated demand for warehouses from which the Council can earn revenue in the form of business rates. The drive for additional revenue appears to exceed all other national strategic & local environmental considerations. 04
LPA10
75A e 5EA

3.13 In order to justify their approach, the Council have attempted to build a case that land is required to satisfy employment needs. In this respect PAG pointed out obvious errors and flaws in their calculations at the Preferred Options stage. This has resulted in a revised ELNS document, Ref 2, provided with the Draft Submission. The revised ELNS attempts but fails miserably in our view to explain excessive employment needs forecasts to justify the need to remove Parkside from Green Belt. In our Preferred Options response, Ref 1, we presented the following graph which showed just how unrealistic the estimates were.

3.18 In summary the Council's equation appears to be as follows:

- We need lots of warehouses to generate revenue.
- To justify this, we need to create a picture of high employment needs
- However, having done this we will not have enough employable people to meet the scale of warehouses we want to build, so to get around this we will make some wild assumptions about people working beyond their normal retirement age and booming national economy for the next 15 years to balance the demand.
- Once we've done all this, we can then justify the release of huge chunks of Green Belt, especially close to motorways and key trunk roads. Additionally, we can justify sacrificing strategic rail freight capability too because it is easier to attract warehouse occupiers than raise interest in constructing a freight terminal.

3.19 We would advocate that the above reasoning does in no way meet the 'special circumstances' requirements for release of Green Belt as defined in National Planning Policy. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.

3.20 The Green Belt Review document included with the Draft Submission, Ref 3, builds on the fictitious employment demand calculations highlighted earlier and attempts to identify suitable land.

3.21 With regards Parkside East, page 51 of the Green Belt review states *'The 2018 SA concluded that development of the parcel for employment use would have a mixed impact on the achievement of SA objectives. Such development is likely to have a negative effect on air quality and biodiversity, as it would generate additional HGV vehicular movements within an existing AQMA and the parcel is only 144m from a SSSI.'*

3.22 Page 272, states *'Parcel GBP_039 (Parkside East) continues to make a strong contribution to the purposes of Green Belt land.'*

3.23 Therefore, the Green Belt Review recognises the value of Parkside East as Green Belt. A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.

3.24 The Draft Submission lays out conditions of use for Parkside East in Policy LPA10. Para 4.36.6 states *'The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres).'* As we have pointed out many times before such statistics do not differentiate bulk e.g. aggregates vs non-bulk freight. Parkside would not have any bulk capability typically therefore quoting such figures is erroneous and misleading. The paragraph should be removed or corrected.

3.25 LPA 10 also states *'The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However, for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.'*

3.26 In effect the Council are saying here that a nationally significant location identified for use as a freight terminal can be reduced to just 60ha or less than 50% of its actual potential for

03 Parkside East and only 25% of its potential for the combined area of Parkside East & West in order to accommodate warehouse development. 03

4 Summary

We would ask the inspector to examine the following areas based on our previous discussion herein:

1. Has the strategic nature of Parkside for use as a rail freight terminal been compromised?

03 a. Reduced freight terminal capability caused by not making use of the full potential of Parkside West (the actual site of the former colliery). In 2001 Rail Track produced a planning application for a freight terminal that was entirely based on Parkside West. The previous Prologis planning application in 2010 made use of both Parkside East and West and fully promoted inter-modal capabilities for the transfer of freight from road to rail. The Local Plan Draft submission makes no mention of inter-modal requirements of site occupiers for Parkside West. 03

b. Reduced freight terminal capability due to a reduction in available land from 227ha to just 60ha on Parkside East to meet further warehouse developments?

2. Does policy LPA 10 offer enough protection for the environment and impacts to the local community?

02 The currently adopted Core strategy CAS 3.2 condition 7 states '*7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

CAS 3.2 condition 9 states '*9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

02 The CAS 3.2 condition 11 states '*11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St. Helens local authority area;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

02	Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.	02
07	3. Do the ELNS employment demand calculations actually stack up?	LPA 04
	The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	07 Sites 7EA & 8EA
08	4. Have the Council properly considered the views of the local community?	LPA 08
	Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.	LPA 10 Sites 7EA & 8EA
03	4.1 PAG would ascertain that the Local Plan is unsound for the following reasons:	
	<ul style="list-style-type: none"> The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. [Not consistent with National Policy – protection of Strategic Sites] 	03
07	<ul style="list-style-type: none"> Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate. [Not consistent with National Policy – Green Belt Protection] 	07
09	<ul style="list-style-type: none"> Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts for what is proposed] 	09 LPA 10 Sites 7EA & 8EA
10	<ul style="list-style-type: none"> Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts] 	10 LPA 10 Sites 7EA & 8EA
08	<ul style="list-style-type: none"> Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council. [fails duty to cooperate] 	08
11	The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	11 LPA 10 Sites 7EA & 8EA

PO3479

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



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EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



alleviating traffic for the local area, when in effect all it will do is facilitate the movement of site traffic onto the local road network. Some of the local country roads are highly unsuitable for heavy good vehicle traffic with tight bends, narrow sections, and low railway bridges subject to strikes.

03

3.9 The proposed route for Link Road also dissects Parkside East and reduces the land area for Parkside East, significantly limiting the flexibility for Rail Freight use. Of note the Link Road was never considered as part of the freight terminal topology options presented in the evidence base with the Local Plan Preferred Options stage, meaning that a very significant assumption has been made that a Freight Terminal is actually viable on Parkside East, particularly with regards to loading space, and 770m siding operation.

03

3.10 We also note that evidence presented with the Draft Submission states that 770m capability is a 'soft requirement'. This is a very strange assertion given that Network Rail have spent the last few years adding 770m capability to the entire UK rail network? A non 770m freight terminal would again offer reduced capability.

3.11 In summary the removal of Parkside West and the Link Road route have severely reduced the capability as strategic rail freight site with available land being reduced by as much 60-70% approximately in total.

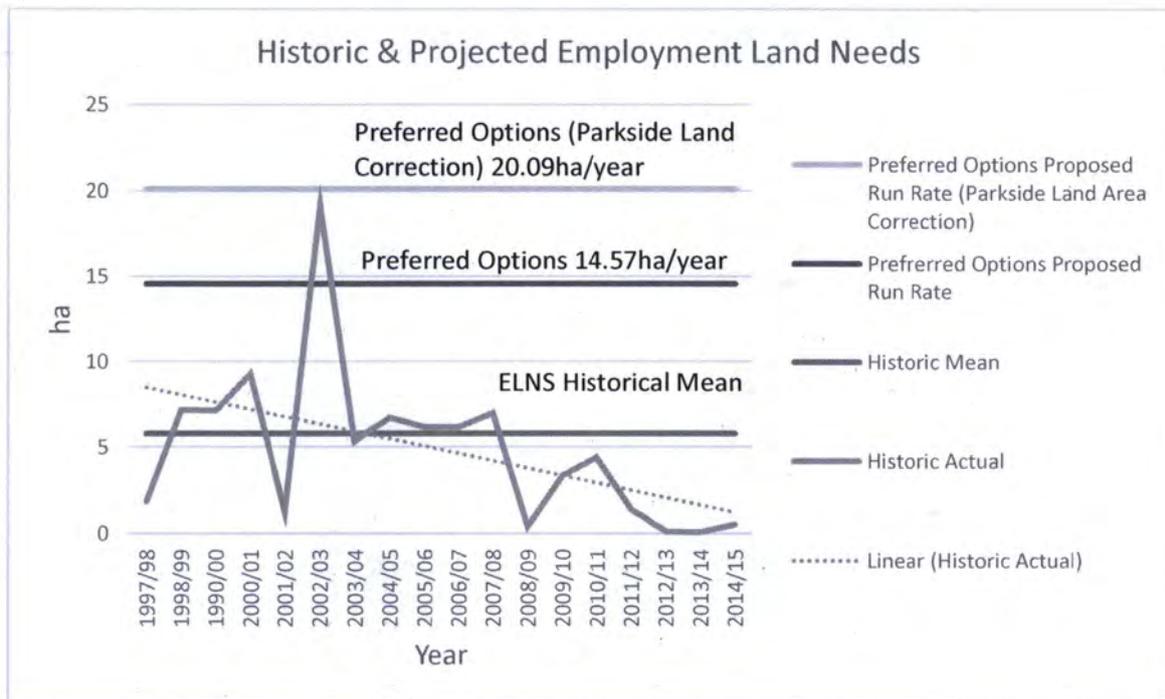
3.12 So why has this approach being taken by the Council? The Council are looking to capitalise on the recent change from high street to internet shopping. This has generated an anticipated demand for warehouses from which the Council can earn revenue in the form of business rates. The drive for additional revenue appears to exceed all other national strategic & local environmental considerations.

04
LPA10

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04

3.13 In order to justify their approach, the Council have attempted to build a case that land is required to satisfy employment needs. In this respect PAG pointed out obvious errors and flaws in their calculations at the Preferred Options stage. This has resulted in a revised ELNS document, Ref 2, provided with the Draft Submission. The revised ELNS attempts but fails miserably in our view to explain excessive employment needs forecasts to justify the need to remove Parkside from Green Belt. In our Preferred Options response, Ref 1, we presented the following graph which showed just how unrealistic the estimates were.



3.14 Para 2.9 of the revised ELNS , Ref 2, states 'Having this additional two years of information enables the average take-up levels used in the ELNS to be updated, summarised in Table 5. It is apparent that the most recent two years do not represent a return to growth comparable to the peak period of 1998-2008 (averaging 7.5 ha per annum), the basis of the Growth Period scenario in the ELNS. Therefore, this Growth Period scenario forecasting will not have changed from the ELNS.' **In other words, things have not picked up as expected but we are still going to use a small band of data from over 20 years ago as the basis for our future forecast.**

3.15 The revised ELNS goes on to try and explain how the Council plan to compensate for over employment capacity caused by the scale of their development proposals.

3.16 Para 5.5 states 'Therefore, it is apparent that the traditional working age population of St Helens would not be sufficient to service a growing employment demand, assuming all other factors remain the same (e.g. unemployment rate, economic activity rate, etc.).'

3.17 Para 5.12 sates 'In order to maintain the same number of employed persons aged 16-64 in the borough based on the baseline population forecasts, there would need to be an increase in the economically active rate and a decrease in the unemployment rate.' **In other words, in order to meet the employment projections, caused by our developments we will assume people will work longer (past typical retirement age) and assume unemployment nationally to be very low over a long period of time.** The ELNS makes huge assumptions that are bordering on being fictious.

3.18 In summary the Council's equation appears to be as follows:

- We need lots of warehouses to generate revenue.
- To justify this, we need to create a picture of high employment needs
- However, having done this we will not have enough employable people to meet the scale of warehouses we want to build, so to get around this we will make some wild assumptions about people working beyond their normal retirement age and booming national economy for the next 15 years to balance the demand.
- Once we've done all this, we can then justify the release of huge chunks of Green Belt, especially close to motorways and key trunk roads. Additionally, we can justify sacrificing strategic rail freight capability too because it is easier to attract warehouse occupiers than raise interest in constructing a freight terminal.

3.19 We would advocate that the above reasoning does in no way meet the 'special circumstances' requirements for release of Green Belt as defined in National Planning Policy. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.

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3.23 Therefore, the Green Belt Review recognises the value of Parkside East as Green Belt. A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.

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PO3480

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



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lpsd-representation-form PAG March 2019.pdf

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Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/
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St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address: Postcode:
Postcode:	
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] _____ Date: 23 - FEB - 2019

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Yes (Via Email) No

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

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

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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"/>
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PO3481

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

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Postcode:	
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Email: [REDACTED]	Email:

Signature: Date:

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<input type="checkbox"/>	No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes , I wish to participate at the oral examination
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EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



3.18 In summary the Council's equation appears to be as follows:

- We need lots of warehouses to generate revenue.
- To justify this, we need to create a picture of high employment needs
- However, having done this we will not have enough employable people to meet the scale of warehouses we want to build, so to get around this we will make some wild assumptions about people working beyond their normal retirement age and booming national economy for the next 15 years to balance the demand.
- Once we've done all this, we can then justify the release of huge chunks of Green Belt, especially close to motorways and key trunk roads. Additionally, we can justify sacrificing strategic rail freight capability too because it is easier to attract warehouse occupiers than raise interest in constructing a freight terminal.

3.19 We would advocate that the above reasoning does in no way meet the 'special circumstances' requirements for release of Green Belt as defined in National Planning Policy. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.

3.20 The Green Belt Review document included with the Draft Submission, Ref 3, builds on the fictitious employment demand calculations highlighted earlier and attempts to identify suitable land.

3.21 With regards Parkside East, page 51 of the Green Belt review states *'The 2018 SA concluded that development of the parcel for employment use would have a mixed impact on the achievement of SA objectives. Such development is likely to have a negative effect on air quality and biodiversity, as it would generate additional HGV vehicular movements within an existing AQMA and the parcel is only 144m from a SSSI.'*

3.22 Page 272, states *'Parcel GBP_039 (Parkside East) continues to make a strong contribution to the purposes of Green Belt land.'*

3.23 Therefore, the Green Belt Review recognises the value of Parkside East as Green Belt. A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.

3.24 The Draft Submission lays out conditions of use for Parkside East in Policy LPA10. Para 4.36.6 states *'The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres).'* As we have pointed out many times before such statistics do not differentiate bulk e.g. aggregates vs non-bulk freight. Parkside would not have any bulk capability typically therefore quoting such figures is erroneous and misleading. The paragraph should be removed or corrected.

3.25 LPA 10 also states *'The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However, for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.'*

3.26 In effect the Council are saying here that a nationally significant location identified for use as a freight terminal can be reduced to just 60ha or less than 50% of its actual potential for

PO3482

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Last Name: Tyas	Last Name:
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Postcode:	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 23 - FEB - 2019

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St. Helens Council

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Yes (Via Email) No

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

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

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

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

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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 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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PO3483

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
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13/03/2019 09:30

Cc:

[Redacted]

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PO3484

EF0058/
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Dave Tyas

to:
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13/03/2019 09:30

Cc:

[Redacted]

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Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/
01-11



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address: Postcode:
Postcode:	
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] _____ Date: 23 - FEB - 2019

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

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



St. Helens Council

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Address: 4 Holford Way Newton-le-Willows	Address:
Postcode: WA12 0BZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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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.

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

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

- Please see documents:
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 2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)
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Please continue on a separate sheet if necessary

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

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

<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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EF0058/
01-11
Policies:-
LPA10
LPA04
Sites 7EA &
8EA

Parkside Action Group
PAG Response to St Helens Local Plan Submission Draft
January 2019
Non-Technical Summary, March 2019



02	Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.	02
07	3. Do the ELNS employment demand calculations actually stack up?	LPA 04
	The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	07 Sites 7EA & 8EA
08	4. Have the Council properly considered the views of the local community?	LPA 08
	Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.	LPA 10 Sites 7EA & 8EA
03	4.1 PAG would ascertain that the Local Plan is unsound for the following reasons:	
	<ul style="list-style-type: none"> The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. [Not consistent with National Policy – protection of Strategic Sites] 	03
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10	<ul style="list-style-type: none"> Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts] 	10 LPA 10 Sites 7EA & 8EA
08	<ul style="list-style-type: none"> Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council. [fails duty to cooperate] 	08
11	The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	11 LPA 10 Sites 7EA & 8EA

PO3485

EF0058/
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:
planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas [Redacted]

To: [Redacted]

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



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Council

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Postcode:	
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RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

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EF0058/
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LPA10
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Sites 7EA &
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PO3486

EF0059/

01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to: planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc: Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

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Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

Hide Details

From: [REDACTED]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [REDACTED]

3 Attachments



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Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

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Dave Tyas
Co-Chair PAG.

EFO059 /
01-25



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First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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

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EF0059
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Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

Please see documents:

3. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
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Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

1. Purpose

1.1 This document provides a Planning Context Response to the St Helens Local Plan Submission Draft January 2019.

2. Introduction

I, Richard Ward, of Hermitage Green Lodge, Hermitage Green Lane, Winwick, Warrington, WA2 8SJ, email address: richard_h_ward@compuserve.com, am a member of the Parkside Action Group.

Parkside Action Group is an organisation that is a local voice for those concerned local people who are conscious on how to shape their surroundings in particular in and around the former Parkside colliery.

I am a member of "The Battlefields Trust" and a member of "The Open Spaces Society".

To which I apply to be on the examination panel before the inspector.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

3. NPPF February 2019

The National Planning Policy Framework was introduced in March 2012 (NPPF 2012) where changes were created to simplify the previous Unitary Development Plan (UDP). The NPPF 2012 allowed the Local People to become more involved in their surroundings under the new vision for their area under a Local Plan as detailed in paragraph 1,

In July 2018, a revision of the NPPF 2012 was published, revised February 2019 (NPPF), which addresses several issues, but only referenced the involvement of Local People once and only as a part of the Plan-making procedure. But in doing so, it raises the importance of the Local People over and above the Local Planning Authority. Paragraph 15 of the NPPF states under

"3. Plan-making

15 *"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."*

This crucial change at the start of the Plan-making process, that an up-to-date plan is purely and correctly placed upon the shoulders of the Local People and not the Local Planning Authority (or "their accountable councils" NPPF 2012). This clearly is a change for the better for the local people.

The header from NPPF paragraph 11 states:

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"The presumption in favour of sustainable development"

Paragraph 11 itself makes a distinction between plan-making and decision-taking.

"For **plan-making** this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

⁵ As established through statements of common ground (see paragraph 27).

⁶ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change."

Paragraph 11 of the NPPF is now the heart of the NPPF: plan making is now in the hands of the local people.

This paragraph gives the local people a strong reason for restricting the overall scale, type or distribution of development in the plan area.

This is a very important legal clause to protect the policies referred to are those in this Framework under footnote 6. This means the development plan and any application can not destroy those areas of importance to the character, essence and shape of the local peoples surroundings once the local people approve the restriction in the Local Plan.

One thing must be pointed out in the Judgment **[Forest of Dean]** [2016] EWHC 421 (Admin) Case No: CO/4852/2015 where THE HON MR JUSTICE COULSON stated in paragraphs 21 and 22:

21. However, before coming to that, I think it is worth giving one example of a policy which is expressly referred to in footnote 9, and which may therefore be regarded as a policy restricting development within the definition of Limb 2. That concerns the Heritage Coast. Although this is a policy referred to in footnote 9, the only express reference to the Heritage Coast in the body of the NPPF comes in the second bullet point of paragraph 114. This provides that:

"Local planning authority should...maintain the character of the undeveloped

coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to an enjoyment of the coast."

01 22. *I accept Mr Wadsley's submission that this is a very general statement of policy. But its inclusion in footnote 9 indicates that the policy is considered to be, even in those general terms, restrictive. In my view, it can be regarded as a policy indicating that "development should be restricted" only because the general presumption in favour of development may not apply in areas defined as Heritage Coast, in consequence of the operation of paragraph 114. I note, as Mr Wadsley did, that Mr Elvin did not address this point, although it was expressly raised in Mr Wadsley's opening submissions.* 01

This judgment states that any reference that is only stated once (in the NPPF) with no other qualification, that reference becomes a policy in its own right.

Therefore as paragraph 11 above stands as a separate statement in plan-making, and due to the grammar separation of ";" and "and", all three must be satisfied for a Plan to be signed-off as a current and adopted local plan.

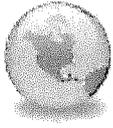
This means that when a plan has been found sound it is then up to the "Local People" who must approve after the inspector's report and not the local planning authorities as paragraph 15 does not mention local planning authorities.

It also means that not only the local planning authority can propose a local plan but the Local People can also propose a local plan as well. This also indicates the Local People as decision-takers by default and it is to the Local People who must also adjudicate decisions and not just the local planning authority at the decision stage. Else how can the local people control: "to shape their surroundings"?

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EF0059/

01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

[Redacted]

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]

To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>

Cc: [Redacted]

[Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to: [redacted]
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc: [redacted]

Hide Details

From: [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

3 Attachments



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



lpsd-representation-form R.Ward PAG Response.pdf



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Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.

EFO059 /
01-25



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [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)

EF0059
01-25



St. Helens
Council

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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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

Yes (Via Email)

No

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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 LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

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Please keep a copy for future reference.**

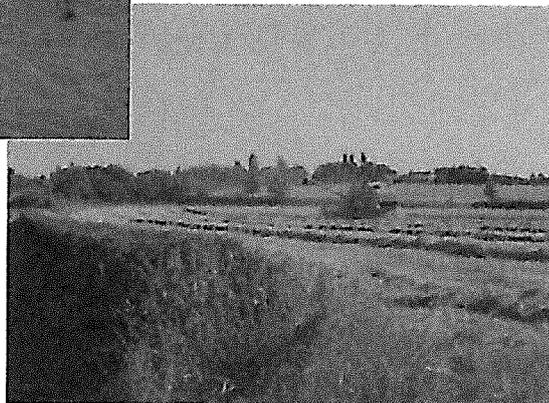
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Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

4. Grounds for objections

02

a. Registered Battlefield

In October 2017 the National Planning Authority Heritage England (HE) submitted the planning application proposal for the Battle of Winwick Pass (also known as Red Bank) to be a designated Heritage Asset Registered Battlefield. In the legally recognised Aarhus Convention for public participation St Helens Council (SHC) and the SHC and Langtree Plc Venture Group (VG) separately objected to the battlefield registration in part of the area known as the former Parkside Colliery in Newton park.

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The submitted objections were considered by HE. On 31 January 2018 HE published the decision: HE granted the Battle of Winwick Pass as a Designated Heritage Asset - Registered Battlefield.

The Aarhus Convention gives the opportunity to those who objected, to challenge the decision. Neither SHC or VG took the Aarhus Convention route to challenge the decision in court.

Consequences

i. A consequence of their decision not to challenge the decision in court is that SHC and VG have accepted the HE grant of registration of the Battle of Winwick Pass inclusion of the former Parkside Colliery Site in Newton Park as a part of the Registered Battlefield location.

ii. Another consequence is that SHC Local Plan is since 31 January 2018 no longer up-to-date.

iii. The third conclusion is that when a further planning application situated on the Registered Battlefield Site concerns the same objections as submitted to the National Planning Authority HE registration planning process, the further planning application cannot be overridden by a local authority, but must be assessed at National level.

iv. Since 24 July 2018 the NPPF is revised, latest update 19 February 2019. This means that applications have to follow the revised version of the NPPF, especially when it regards paragraph 11b)i, footnote 6.

Conclusion

The local people consider the preservation of the irreplaceable designated heritage asset registered battlefield in order for the existing and future generations to enjoy as stated in the NPPF paragraph 184 as a platform for the local people to shape their surroundings.

02

02

03 developer of the Parkside Link Road, together with SHC being a joint owner/developer with Langtree plc of the developments: Phase 1, Phase 2, Phase 3 and Phase SRFI. Parkside as a "whole project" must be considered by the Major Infrastructure Unit of the Planning Inspectorate and would be the subject of a ministerial decision. 03

02 **c. Environmental aspects: project as a whole** 02

Local Plan 2012 Policy CAS 3.2 and the Proposal Phase 1, Phase 2, Phase 3, Phase SRFI and Parkside Link Road

St Helens Council (SHC) within 5 years of the current Local Plan to 2027 adopted 31 October 2012, decided to submit for public consultation their proposed update to the SHC Local Plan 2012 in December 2016.

Policy CAS 3.2 was approved on 31 October 2012. But one thing that SHC left out of the local plan, despite the Inspector's recommendation is "including battlefields", see the Inspectors Report 01 October 2012 (Ref: PINS/H4315/429/3) where paragraph 41 states:

*"It is of course very likely that an SRFI scheme at Parkside would be inappropriate development in the Green Belt (as defined by Section 9 of the NPPF), it is inevitable that it would transform the appearance of the mostly 'open' countryside site and that its presence would alter the character of the surrounding area and impact on the lives of local people to a significant degree. Health, air quality (bearing in mind that there is already an Air Quality Management Area in the vicinity), light and noise impacts, together with effects on biodiversity (including the nearby SSSI), farming, archaeology/heritage (**including battlefields**), landscape, agricultural land and a range of other issues would need to be carefully assessed in detail and the potential for, and likely impact of, mitigation measures considered. Even so, it is likely that not all local harm could be avoided, mitigated or compensated for.*

Note: **Bold blue text** emphasis by R. Ward.

Policy CAS 3.2 as shown published in the SHC Local Plan 2012:

02 **"Policy CAS 3.2**

Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location. 02

The Council believes a deliverable and viable SRFI can be developed on the western side of the M6 with an operational area of approximately 85 hectares, as shown indicatively on Figure 9.2.

02
The Council will support the development of the site identified to the west of the M6 as a SRFI, provided that each of the following criteria are met:

1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;
2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;
3. Direct access to the rail network is achieved and conforms with rail industry strategies and capacity utilisation;
4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;
5. Measures are incorporated which encourage travel to/from the site using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy CP 2. A travel plan will be essential;
6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;
7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;
8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;
9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;
10. Provision for the positive management of existing and new environmental assets;
11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St. Helens local authority area;

12. Training schemes will be put in place to increase the opportunity for the local population to obtain employment at the complex; and
13. All other material issues are satisfied.

02 It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. The Council will also support the development of land to the east of the M6 provided the above criteria are met, plus the following additional criteria:

14. That the area of land to the western side of the M6 is developed first; and
15. That the SRFI is proven to be not deliverable without the additional eastern land area.

Planning permission will not be granted for any other use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange.

Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

(For Figure 9.2 see Map 1)

04 **c. i. Green Belt size and what is actually the development size for Parkside west and Parkside east**

The removal of Parkside east and Parkside west does not comply with the current adopted Local Plan 2012-2027 Policy CAS 3.2 states:

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

This is a clear statement in the policy "Subject to a SRFI being fully developed on site", the word 'being' is very conclusive there MUST be an SRFI first on the site, before the Green Belt revision can be considered. This SHC approved with the inspector and consequently as did the Local People who from the previous NPPF 2012 Core Principles bullet point 1 states:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area..."

04 This the Local People approved till the year 2027 (the plan period) and see the rules are being changed before any development has even turned over a clod of soil, with the only

PO3488

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

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Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to: [redacted]
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc: [redacted]

Hide Details

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Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

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Dave Tyas
Co-Chair PAG.

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01-25



St. Helens
Council

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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

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Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

Please see documents:

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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:

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

03
LPA10
7EA ~ 8EA

b. The development is of national significance

The NPPF Introduction paragraph 5 states:

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications."

In St. Helens Core Strategy Examination 2011/2012 the inspector asked SHC an additional question number 25. The question was:

"Would an SRFI of the size envisaged in policy CAS 3.2 be a "nationally significant infrastructure project" as defined in the Planning Act 2008? If so, what implications are there for the policy CAS 3.2?"

The answer from SHC (examination document number EX009) was:

"The Council considers that an SRFI of the size envisaged in policy CAS 3.2 would constitute a "nationally significant project" as defined in the Planning Act 2008."

Under paragraph 8 of EX009, SHC states:

"The only impact on policy CAS 3.2 that the Council considers is the fact that the Council would not be the deciding authority for any application arising and would therefore provide a different role. Given this the term "planning permission will be granted...." in the current version of CAS 3.2 is perhaps inaccurate. This wording could be replaced by "the Council would support a development provided that" Which gets around the issue of the Council not being the deciding authority. An amendment of the wording along these lines could be proposed as a further minor post publication change."

But in the adopted and current Local Plan 31 October 2012 in Policy CAS 3.2, SHC failed to follow what they stated above. Policy CAS 3.2 SHC states the following:

"The Council will support the development of the site identified to the west"

and

"The Council will also support the development of land to the east"

By changing the word "would" into "will" as stated to the Inspector in EX009 in Policy CAS 3.2 SHC has reverted back to *"..not be the deciding authority for any application..."*

03
Nevertheless, SHC is also the deciding authority, based on their joint venture with Langtree Plc for Phase 1, Phase 2, Phase 3 and Phase SRFI, as well as, SHC as sole applicant for the PLR. Therefore, the Secretary of State needs to intervene. 03

In the St Helens Local Plan Submission Draft January 2019 in document ST.HELENS BOROUGH LOCAL PLAN 2020-2035 The Infrastructure Delivery Plan (IDP) is a supporting document (ST.HELENS BOROUGH LOCAL PLAN 2020-2035 INFRASTRUCTURE DELIVERY PLAN DECEMBER 2018) states in paragraph 3.37:

“Parkside Rail Access for Freight

3.37 *The emerging Local Plan proposes to allocate land to the east of Parkside, Newton-le-Willows to facilitate rail enabled development. **The site is considered suitable in principle for development as a Strategic Rail Freight Interchange (SRFI) of regional and national significance.** The development of the site would allow for fast-moving consumer goods to be transported to Parkside and then distributed to the wider region. The realisation of this would play a key role in meeting the objectives of the emerging Local Plan and facilitate the long term rail strategy for the north, as confirmed in The Liverpool City Region Freight and Logistics Strategy.”*

(LPPO = Local Plan Preferred Option)

Note: **Bold blue text** emphasis by R. Ward.

Re-confirming what SHC stated to the inspector (examination document number EX009):

“The Council considers that an SRFI of the size envisaged in policy CAS 3.2 would constitute a “nationally significant project” as defined in the Planning Act 2008.

Conclusion

03
This confirms that St Helens Council and as a joint owner/developer of the Parkside site in Newton Park, knowingly have declared that the whole project is of national significance in their (SHC, not the Local People) infrastructure delivery plan, thus making the Parkside site a **National Significant Infrastructure Project (NSIP)** and have knowingly split the project in to smaller developments. This confirms by St Helens Council declaration in their LPPO, the whole project, as previously shown in the St Helens Council current adopted Local Plan 2012 Policy CAS 3.2, as being a nationally significant infrastructure project as stated in the NPPF paragraph 5: 03

“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended)....”

This means all references to Parkside site as a SRFI project, must be removed from the St Helens Local Plan Submission Draft January 2019, due to SHC declaration as sole

03 developer of the Parkside Link Road, together with SHC being a joint owner/developer with Langtree plc of the developments: Phase 1, Phase 2, Phase 3 and Phase SRFI. Parkside as a "whole project" must be considered by the Major Infrastructure Unit of the Planning Inspectorate and would be the subject of a ministerial decision. 03

02 **c. Environmental aspects: project as a whole** 02

Local Plan 2012 Policy CAS 3.2 and the Proposal Phase 1, Phase 2, Phase 3, Phase SRFI and Parkside Link Road

St Helens Council (SHC) within 5 years of the current Local Plan to 2027 adopted 31 October 2012, decided to submit for public consultation their proposed update to the SHC Local Plan 2012 in December 2016.

Policy CAS 3.2 was approved on 31 October 2012. But one thing that SHC left out of the local plan, despite the Inspector's recommendation is "including battlefields", see the Inspectors Report 01 October 2012 (Ref: PINS/H4315/429/3) where paragraph 41 states:

*"It is of course very likely that an SRFI scheme at Parkside would be inappropriate development in the Green Belt (as defined by Section 9 of the NPPF), it is inevitable that it would transform the appearance of the mostly 'open' countryside site and that its presence would alter the character of the surrounding area and impact on the lives of local people to a significant degree. Health, air quality (bearing in mind that there is already an Air Quality Management Area in the vicinity), light and noise impacts, together with effects on biodiversity (including the nearby SSSI), farming, archaeology/heritage (**including battlefields**), landscape, agricultural land and a range of other issues would need to be carefully assessed in detail and the potential for, and likely impact of, mitigation measures considered. Even so, it is likely that not all local harm could be avoided, mitigated or compensated for.*

Note: **Bold blue text** emphasis by R. Ward.

Policy CAS 3.2 as shown published in the SHC Local Plan 2012:

02 **"Policy CAS 3.2**

Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

02 *The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location.* 02

The Council believes a deliverable and viable SRFI can be developed on the western side of the M6 with an operational area of approximately 85 hectares, as shown indicatively on Figure 9.2.

PO3489

EF0059/
01-25



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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 checked="" type="checkbox"/>
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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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Effective?	X
Consistent with National Policy?	X

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

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Please continue on a separate sheet if necessary

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

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

12. Training schemes will be put in place to increase the opportunity for the local population to obtain employment at the complex; and
13. All other material issues are satisfied.

02 It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. The Council will also support the development of land to the east of the M6 provided the above criteria are met, plus the following additional criteria:

14. That the area of land to the western side of the M6 is developed first; and
15. That the SRFI is proven to be not deliverable without the additional eastern land area.

Planning permission will not be granted for any other use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange.

Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

(For Figure 9.2 see Map 1)

04 **c. i. Green Belt size and what is actually the development size for Parkside west and Parkside east**

The removal of Parkside east and Parkside west does not comply with the current adopted Local Plan 2012-2027 Policy CAS 3.2 states:

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

This is a clear statement in the policy "Subject to a SRFI being fully developed on site", the word 'being' is very conclusive there MUST be an SRFI first on the site, before the Green Belt revision can be considered. This SHC approved with the inspector and consequently as did the Local People who from the previous NPPF 2012 Core Principles bullet point 1 states:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area..."

04 This the Local People approved till the year 2027 (the plan period) and see the rules are being changed before any development has even turned over a clod of soil, with the only

reason from Policy CAS 3.2 is that SHC are now the developer as well as SHC as a local plan maker are wanting to change the rules in SHC favour without the agreement with the Local People.

04 I refer here to the Court judgment [2012] EWHC 1889 (Admin), Case No: CO/12156/2011 where the Council development plan agreed to a series of conditions that was not followed in the subsequent application though the council passed the application, the judgment quashed the approval. I put this as an explanation what is going on with the whole Parkside East and West fiasco. 04

Who now in the revised NPPF have been given more of a say in Local Plan-making under the NPPF paragraph 15, has raised the Local People over and above the Council in the final say:

"a platform for Local People to shape their surroundings"

Without the Local People having to qualify their reasoning to accept or refuse the platform or local plan. The creators of NPPF does not explain or give reasoning behind the phrase.

Regarding the actual size of the Parkside development

CAS 3.2 states 85 Ha for Parkside west and 70 Ha for Parkside East in total 155Ha

The update in LPA10 for 7EA in paragraph 4.36.13 as being

"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."

"Justification for removing Site 7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

04 4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. **Out of a total of 124.55ha** of land at Parkside East it is estimated that **64.55ha** will contribute to the Borough's needs for employment development with the remaining **60ha** being required to provide related rail and road infrastructure and landscaping. A further **5.58ha** of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site."

From the Green Belt does Parkside east = 124.55Ha i.e. 64.55Ha + 60 Ha = 124.55Ha

With on Parkside West having 5.58Ha as the rail spur line but CAS 3.2 states Parkside west is 85 Ha in total then minus 5.58Ha = 79.22Ha

This means the total size of 7EA +8EA is 124.55 +79.22 = 203.77Ha But CAS 3.2 total size is 155Ha Where has the additional 48.77Ha come from?

To me the Green Belt justification is wrong as it does not follow the Appendix 5 7EA and 8EA figures:

In Appendix 5 shows from the two map headers:

LPSP Ref:	7EA - Parkside East, Newton-le-Willows	Ward:	Newton
Notional Capacity:	64.55ha	Designation:	Allocate

LPSP Ref:	8EA - Parkside West, Newton-le-Willows	Ward:	Newton
Notional Capacity:	79.57ha	Designation:	Allocate

Making a total of 64.55 + 79.57 = 144.12Ha these two figures are confirmed in the Green Belt main chapter 1-5 as for the areas: **GBP_039 Parkside East as 64.55Ha and for GBP_041 Parkside West as 79.57Ha** as shown on the Figure 4.4 (see Map 2)

In the 2011/2012 hearings to the inspector's question 5 in EX003 was answered by SHC regarding the size:

"Question 5

04 "Policy CAS 3.2 – the now withdrawn planning application for the Parkside SRFI was for a 272ha site, but the policy envisages a maximum 155ha site. What is the reason for this difference?"

Response

1. In responding to this question it is first helpful to clarify that the policy includes analysis of a "dummy scheme" to explore the likely scale of such a development in the Core Strategy. It is important to stress that this "dummy scheme" bears no direct relation to the withdrawn application and has been produced independently. Obviously there are clear similarities between the two as there are certain "givens" about the potential layout of the site.

04 2. *If comparisons are being made between the dummy scheme and the withdrawn planning application there is one key difference. The 155ha quoted for the "dummy scheme" is only the operational area of the Strategic Rail Freight Interchange whereas the 272ha for the withdrawn planning application is the boundary of that application and therefore includes the operational area together with other associated land uses such as landscape buffer zones and a country park.* 04

If the total area is 272Ha (or 155Ha = 85Ha west and 70Ha East operational land) in 2011 to the inspector; how is it that only 144.12 Ha (64.55Ha east and 79.57Ha west) is removed from Green Belt What happened to the other 127.88 Ha when the CAS 3.2 and 7EA/8EA maps are identical.

This still leaves the Green Belt size quoted 144.12Ha for release short of the true figure 272Ha or 227Ha by 83 Ha. Green Belt release must be defined precisely and not, if the 144Ha is operational size. The Parkside west from the British Coal submission with Morrisons in 1994 gave the overall figure of approx 97Ha comprising of Agricultural fields (a) 12.2ha; (b) 10ha; (c) 18.2ha Area (i) Eastern Tipping 21ha and the core area (ii) 33Ha. Newton Park Farm was excluded from the calculations

From the Phase 1 Jan 2018 Spawforths main document page 33/34 paragraph 2.1 Phase 1 size is 47.90Ha and from page 102 paragraph 9.14 Phase 2 size is 43.16ha (this excludes Newton Park Farm). Operational size total 52.69Ha (including Rail safeguarding of 1.02+0.05ha) Landscaping buffers 25.11 +13.26 = 38.37Ha

This is very confusing because if the 272Ha and 155Ha are correct as shown in the Local Plan 2012 hearing sessions document EX003 then the submitted Green Belt document(s) are incorrect and legally not compliant.

Or are legally not compliant as the information with regards to size are wrong This causes knock on effects when considering other criteria when allocating the land of the SRFI in 7EA and 8EA etc etc etc. As &EA state 124.55Ha is 7EA but the Green Belt states that 7EA +8EA is 144.12 Ha indicating the west side is only 144.12 - 124.55Ha in size knowing it is in effect from the British Coal 1994 documents 97Ha for the west side 04

04 Green Belt release must be defined precisely and not the 144Ha is operational size. The Parkside west from the British Coal submission with Morrisons in 1994 gave the overall figure of approx 97Ha comprising of Agricultural fields (a) 12.2ha; (b) 10ha; (c) 18.2ha Area (i) Eastern Tipping 21ha and the core area (ii) 33Ha. Newton Park Farm was excluded from the calculations.

So this leaves the total including Newton Park Farm of 272Ha minus the total for Parkside west (minus Newton park Farm) 97Ha = 175 Ha for Parkside east (This includes the area for Newton Park Farm).

But Parkside east according to the Green Belt figure is 64.55Ha, so what happened to the rest?

Due to the SHC adjudicating the local plan for themselves in order as also being the developer of Parkside East and west, I put it in as it is to let the inspector sort it out.

Recommendation by Local People and PAG
Green Belt at 7EA and 8EA

The effect of the uncertainty of the sizes as shown above for sites 7EA Parkside east and 8EA Parkside West. These area are embedded in many other areas where the precise information is required to analyse how 7EA and 8EA are incorporated in to other polices. Due to the missing information, the analysis of these other policies make the Local People unable to accept and makes the St Helens Local Plan Submission Draft January 2019, not legally compliant.

But as it stands the Local People can not accept this as a platform to shape their surroundings (NPPF paragraph 15), and will in all event restrict any development on both Parkside East and Parkside west (NPPF paragraph 11b)i) that does not follow Local People's Policy LOCAL 10LP.

c. ii. Nationally Significant Infrastructure Project

The Proposed design proposed by SHC as joint owner/developer of Parkside east and Parkside west has been mirrored by SHC in the St Helens Local Plan Submission Draft January 2019, just in order to satisfy SHC needs as (developer) over and above the needs of the Local People, despite the NPPF policy: a platform for local people to share their surroundings. But the NPPF gives the Local People the final say not SHC. SHC in 2012 proposed Policy CAS 3.2 as a Nationally Significant Infrastructure Project to the inspector. The inspector agreed to the various points that must be satisfied to develop the Parkside west and Parkside east, to which SHC agreed by adopting the said policy. But what SHC as developer solely and jointly and as a council has proposed as the development that SHC want on Parkside east and Parkside west fails to follow policy CAS 3.2 as shown:

(The areas in 'highlight' are the points in the policy that SHC has not complied to. By not complying to does not make the policy not up-to-date, it is SHC are trying to change Policy CAS 3.2 to suit their needs and not the local people. The text in 'red' show points of contention and text with 'strikethrough' show option chosen)

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location.

PO3490

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to: [redacted]
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc: [redacted]

Hide Details

From: [redacted]

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

Cc: [redacted]
[redacted]

3 Attachments



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Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.

EFO059 /
01-25



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [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)

EF0059
01-25



St. Helens
Council

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First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

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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
--	----------	--

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EF0059/01-25
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LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

05-09
LPA04
Site 7EA
SEA

c. iv. Employment Types - B8

Table 8 – Employment Capacities within key St Helens Local Plan Preferred Options allocated Employment Sites

LPPO site ref	LPSD site ref	Employment Site	Site Area	Jobs (FTE)	Employment Types
EA2	2EA	Florida Farm North, Haydock	35.17	1,487	B8
EA12	11EA	Gerards Park, St. Helens Town Centre	0.95	91	B1(c); B2
EA11	10EA	Land at Lea Green Farm West, Thatto Heath	3.84	321	B1, B2, B8
EA7	6EA	Land at Millfield Lane and Liverpool Road, Haydock	20.58	1,399	B2, B8
EA3	3EA	Land North of Penny Lane, Haydock	11.05	516	B8
EA4	2ES	Land North East of Junction 23 M6, Haydock	42.34	2,666	B2, B8
EA5	4EA	Land South of Penny Lane, Haydock	2.16	177	B2, B8
EA6	5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	462	B2, B8
EA1	1EA	Omega South Extension, Bold	31.2	1,240	B2, B8
EA10	9EA	Land to the West of Sandwash Close, Rainford	6.96	681	B2, B8
EA9	8EA	Parkside West (Non-SRFI)	79.57	2,351	B8
EA8	7EA	Parkside Rail Terminal		40	Rail uses
EA8	7EA	Parkside East (SRFI)	64.55	2,737	B8
		Total	306.12	14,167	

LPA10,
LPC09
LPC10

05-09

Source: St Helens Council, BE Group analysis, 2017

05-09

From document "Employment Land Needs Study– Addendum Report St Helens Council" The concept that St Helens Council and the Local People who live in the borough that the only employment is B8 warehousing to the extent that there are approximately 14,000 jobs

05-09 at 70m² per job, equates to approx 14,000 x 70 = 980,000m² of warehousing floor space. Where Phase 1 and Phase 2 accommodate approximately 244,000m².

But it is stated that between 7,700 and 9,800 jobs are available for Phase 1, Phase 2, Phase 3 and Phase SRFI from the SIF application documentation. But the above table shows 2351 + 40 + 2737 = 5128 jobs available.

But what is more of the concern of the Local People is:

The amount of B8 warehousing and SHC has stating their requirement for large warehousing:

"4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development,"

The associated requirement of commercial vehicles (for example: HGVs) that have to serve the function of the B8 warehousing as shown in the table 8 above. With the calculation of the expected size of B8 warehousing at an estimate size of 14,000 x 70 = 980,000m² envisaged. The expected pollution from the commercial vehicles expected to serve these large scale logistics developments will affect the health of the Local People, and against the Clean Air Strategy 2019 and current news on air pollution in the news article 11 March 2019, by Paul Cosford, Medical Director, Public Health England at:

<http://www.envirolink.org/2019/03/11/air-pollution-cars-should-be-banned-near-schools-says-public-health-chief/>

and

<https://www.bbc.co.uk/news/uk-47520848>

Air Pollutants means those that do not affect their (local people) surroundings and must include those that seriously comply with the recently published the government document 'Clean Air Strategy 2019': The pollutants with ambient air quality standards in the UK: Nitrogen dioxide (NO₂) / NO_x (vegetation); Particulate Matter (PM₁₀), Fine Particulate Matter (PM_{2.5}); Ozone (O₃); Sulphur dioxide (SO₂)/SO_x; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO₂); Nickel (Ni); Ammonia (NH₃); Non-methane volatile organic compounds (NMVOCs); Polycyclic aromatic hydrocarbons (PAH), Benzo[a]pyrene (B[a]P). The government will ensure industrial sector roadmaps for reducing air pollution are well aligned with those for decarbonisation. Where tensions exist, the government will ensure that a balanced approach is taken which supports clean growth as a whole.

05-09 Together with the associated air pollution eCO₂ produced just from the construction of 980,000m²

The eCO₂ of constructing 980,000m²: each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 980,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes.

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If the concrete used was 1m in depth and the steel used was 0.5m in depth, the B8 construction eCO₂ value will be:

Concrete: 980,000m² x 1m x 2.38 tonnes x 1 tonne eCO₂ = 2,332,400 tonnes eCO₂
Steel: 980,000m² x 0.5m x 7.9 tonnes x 1 tonne eCO₂ = 3,871,000 tonnes eCO₂

05-
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Totalling **6,203,400 tonnes eCO₂** just to construct the B8 warehousing proposed by SHC to justify the 14,000 jobs. SHC need to seriously look again at the employment requirements as the Local People will reject this amount of B8 warehousing.

This eCO₂ figure does not include the thousands of HGV container movements per year to satisfy the 980,000m² of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO₂/tonne/kilometre for HGV. The resultant carbon emissions eCO₂ will never meet government climate change targets.

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings.

The B8 warehousing reasoning above applies to Parkside east and Parkside west.

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The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

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PO3491

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

Hide Details

From: [Redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



lpsd-representation-form R.Ward PAG Response.pdf



R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

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Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.

EFO059 /
01-25



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [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)

EF0059
01-25



St. Helens
Council

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

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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

Please see documents:

3. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
4. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

d. Listed buildings

Newton Park Farmhouse and Barn

24

24

The information discovered in the Phase 1 masterplan(s) shows that the designated Heritage Assets Listed Buildings, known as Newton Park Farmhouse Grade II Listed Building and Newton Park Farm Barn Grade II Listed Building, together with other non-designated dwellings located in what can be stated as the Newton Park farm Complex, are affected by the proposed Phase 3 SRFI Rail Spur line. So much so that the Phase 1 masterplan(s) shows the access road along Newton Park Drive has been removed to accommodate the Rail Spur line and that a new access road and utilities junction is reliant on the Phase 1 from drainage via Phase 2 and other utilities and the reliance on the Parkside Link Road as a new access, all due to the Phase 3 (SRFI).

With this additional information shown by the applicant SHC and Langtree Plc, it clearly shows that the project has been split in to smaller developments, The alteration of the Newton park Farm Complex as shown in the Phase 1 masterplan(s) proves the whole project consists of Phase 1 and must be considered as a whole, otherwise it fails to follow national policies as well as Directive 2011/92/EU, article 2 (1).

e. Transport

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The map Figure 9.2 (see Map 1) shows the location of the intended motorway junction on the M6 as stated in Policy CAS 3.2 in point 2:

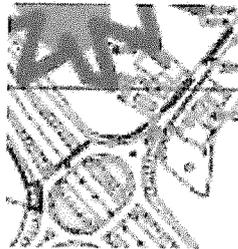
(2) "Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan". As shown:

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LPA10
sites
7EA
2
88A



Indicative Location of New or Revised Motorway Junction

But the SRFI that actually has been proposed by SHC as the Parkside Link Road (PLR) applicant is an indirect access to the M6, in direct conflict with their (SHC) current adopted Local Plan 2012 Policy CAS 3.2 point 2. The actual location of the access to the M6 is in one approach, via the in-direct route the local road A579 Winwick Lane access to the existing M6 Junction 22 at the location:



Another approach to the motorway network is via the in-direct route A49 Winwick Road, where two directions can be taken one to the north via the local road A49 through Newton High Street to the M6 Junction 23, and one to the south via the local road A49 through the town of Winwick to either: via the local road Winwick Link Road to the M6 Junction 22; or via the local road A49 to the M62 junction 9.

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12 Also another approach to the motorway network is due to the in-direct PLR road crossing the motorway M6 bridge access to the local road A573 Parkside Road has yet again two directions that can very in-directly access the motorway network due to this existing local road, first, being the route along the A573 to Winwick and to Warrington to the south connects to the M6 junction 22 and M62 Junction 9 and second, the route along the A573 to Golborne and Lowton to the north to very in-direct route via the A580 East Lancs Road assesses the M6 Junction 23. 12

These in-direct routes the SHC PLR are not compliant with the Current Local Plan 2012 CAS 3.2 points 2, 4, 6, 7 and 8:

- "2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;*
- 4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;*
- 6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;*
- 7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;*
- 8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;"*

12 This in-direct route of the PLR can be shown easier see Map 3 showing the road transport routes that affect the local roads Not just in the Borough of St Helens, Merseyside; but in the borough of Warrington, Cheshire; and the Borough of Wigan, Greater Manchester. Which proves a cross boundary issue. 12

On 6 June 2018 Warrington Borough Council (WBC) Development Management Committee (DMC) meeting was held to decided on the WBC planning application number 2018/32247, this addressed the application P/2018/0048/OUP, as a neighbouring authority. The DMC resolved, voted and made the decision in public to object to the SHC and Langtree plc Phase 1 planning application P/2018/0048/OUP.

12 Nevertheless, SHC as applicant for the PLR and SHC and Langtree plc applicants for Phase 1, Phase 2, Phase 3 and Phase SRFI, needs the cooperation of WBC and of Wigan Council, because the councils are "neighbours". 12

Recommendation by Local People

Transport

CAS 3.2 specifically states "Direct access to the site from the M6" the SHC PLR clearly is an in-direct route utilising local roads to access the site from the M6.

SHC is stating the Local Plan 2012 is not up-to-date in December 2016: **NO**, the SHC PLR is not up-to-date. SHC have clearly not followed their own policy CAS 3.2

The impact that this in-direct access to the motorway M6 on the local road network by not following Policy CAS 3.2 seriously affects, the impacts of the transport, not just from the weight of numbers but from the pollutants from the air quality and from the noise on a 24/7/365 basis, the extra transport will impose upon the Local People making it impossible to shape their surroundings.

The Update local Plan states in document "Employment Land Needs Study- Addendum Report St Helens Council", Tables 9, 10 and 11 on pages 21 to 26, state:

"Parkside West (None SRFI)"

This means to the Local People that Parkside west is not linked to the SRFI, thus does not comply with the CAS 3.2 points 1 to 12 and does not comply with the east criteria statement of CAS 3.2 where: (text highlight and colour to emphasise the following reasoning)

"8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;"

and

"....a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI."

12 This clearly states that the Parkside west in point 8 primary use is to facilitate the movement of freight by rail, but the update states no SRFI movements will occur on Parkside west. Then to accommodate an enlarged SRFI on Parkside east means exactly what it states. For to accommodate an enlarged SRFI means to make or become larger, this indicates a SRFI already exists on Parkside west. 12

Any changes from CAS 3.2, due to the Transport access using in-direct access to the M6, the Local People have very strong reasons for restricting the proposed PLR and associated Phase 1, Phase 2, Phase 3, Phase SRFI, as the PLR is not a platform for the local people to shape their surroundings, therefore the Parkside Link Road is not sound and is not justified, therefore must be removed from the St Helens Local Plan Submission Draft January 2019.

f. Changes to the St Helens Local Plan Submission Draft January 2019

SHC have in the Local Plan 2012 approved Policy CAS 3.2 as a Nationally Significant Infrastructure Project, to which the Local People due to the planning rules at that time, have had to accept Policy CAS 3.2. Despite SHC and previous owners/developers, since 1993 when the colliery closed to date, all failed to complete their desires to enhance the need of employment and their claim that the site was of national significance to develop the former Parkside colliery site. Now SHC together with the joint venture group (SHC and Langtree plc) have recently submitted local level applications that fail to comply with Policy CAS 3.2 on several grounds, though the documentation submitted in the planning applications categorically show the applications are interlinked with each other as a much larger project that should be under an overall project a national level application for the whole indicated by figure 9 in Policy CAS 3.2 and by the previous owner Prologis.

The St Helens Local Plan Submission Draft January 2019 has several policies or areas that confirm the SHC intension not to have the Project taken as a whole but in smaller development. The main policy in the main document are:

(SHC Main document text is shown in black; Response Comments are in dark blue)

4.4 Policy LPA02: Spatial Strategy

10 6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond. Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.

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LPA02
Sites 7EAe
8EA

Comments on para graph 4.4 paragraph 6

Paragraph 6 must be changed written as follows (strikethrough indicates chage):

6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond. ~~Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.~~

LPA04 is purely employment figures and LPA10 (7EA) only refers to Parkside East as a SRFI. This means that Parkside west 8EA employment figure is 2351 jobs. As there is no policy for Parkside west to accommodate the figure of 2351 jobs.

Then the Local People change the Parkside west with the Local Peoples Policy LOCAL 10LP.

Justification

10 The LOCAL 10LP still accommodates the employment figure of 2351 jobs but the Warehousing B8 is altered to Office and Educational space, With the estimated and expected growth in population in the St Helens and neighbouring areas of Warrington and Wigan, the growth in jobs is not only a concern of the Local People but the government. The population increases in several ways, but not all are ready for the jobs market. That is to say, children under the age of normal employment, require to be educated to their natural abilities and goals. To not cater for the demand in the increase in population

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4.34 Policy LPA10: Parkside East

Policy LPA10: Parkside East

- 12
LPA10
7EA
8EA
1. The Parkside East site (identified as Site 7EA in Policy LPA04) shall be considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes.
 2. 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; and
 - b) (i) be rail served (i.e., requiring on-site access to a railway); or
(ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings and landscaping), on at least 60 hectares of the site, at any time in the future.
 3. Proposals for development within site 7EA will be required to:
 - a) satisfy the masterplanning requirements set out in Policy LPA04.1
 - 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;
 - d) comply with Policy LPC11 in relation to the protection of designated heritage assets;
 - 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);
 - f) be designed to minimise impacts on residential amenity;
 - g) establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy LPA07;
 - h) make provision for the positive management of existing and new environmental assets; and

- 12
- 12
- i) put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to and employment at the site.
 - 4. That part of site 7EA which falls to the west of the M6 is safeguarded from all forms of development so that it may provide future siding facilities in connection with the development of an SRFI or other rail-enabled development within the part of the site which falls to the east of the M6 (see policies map).

4.36 Reasoned Justification

4.36.1 There is a long-standing history of developer interest in providing a Strategic Rail Freight Interchange (SRFI) on land within and close to the former Parkside Colliery. There have been a number of planning applications for such a use and the area was highlighted as a potential location for this use in the former Regional Spatial Strategy for the North West (2008).

Comments

Also see 4.12.12

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Since 1994 SHC has been advertising what seems like hundreds of reports saying “how Wonderful Parkside is as a Multi-modal Rail Freight Terminal and how this will provide jobs. But the result was the developers withdrew. In 1994-1998 British Coal/Morrisons doth withdrew due to not being able to formulate a transport strategy that did not impact the local area. In 2000 – 2002 Railtrack delayed in placing an application though produced a masterplan then the Labour Government’s Secretary of State for Transport brought Railtrack into administration. In 2004 to 2009 Astral Developments submitted a scheme that was the first to use the east and West sides of the M6 with a dedicated new motorway M6 junction after numerous changes in their transport strategy for the area failed to finalise a solution and was taken-over by the United State company Prologis in 2009. In 2009 Prologis nearly filed for chapter 11 in the States, where with regards to the long-standing application first started by Astral Development they place the application on-hold due to economic reasons. Later Prologis merged with another United States Warehouse construction company and re-opened the Parkside application but approx 6-months later withdrew. Finally Prologis was a part of the SHC local Plan to formulate Policy CAS 3.2 but once Policy CAS 3.2 was adopted sold Parkside to SHC and Langtree plc in 2013. So the developer interest can be said to have been in doubt – one thing that can be said from all developers is: They all failed to solve the road transport problem access to the Parkside area and the direct access to the motorway network. The 2018/20219, SHC road transport solution is nearly identical or along the same lines to the British Coal/ Morrisons scheme in 1994.

Having reports saying Parkside is a suitable site all fail to address the local transport problem. So this paragraph and other related paragraphs do not show any weight towards showing Parkside on transport grounds is a sustainable development and shows due to

these transport failures not to be sound. To which the Local People agree as it fails to be a platform the local people can shape their surroundings.

National Policy Statement for National Networks (2015)

4.36.2 The National Policy Statement for National Networks (NPS) 2015 recognises that the railway network forms a vital part of the UK's transport infrastructure that must: "... provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life".

4.36.3 The NPS strongly supports the development of an expanded network of SRFIs to help promote economic development (by responding to the changing needs of the logistics sector and addressing growth in movement of freight by rail) and addressing climate change. The NPS also stresses that SRFIs should be located near to business markets such as major urban centres or groups of centres and be linked to key supply chain routes. It suggests that SRFI capacity needs to be provided at a wide range of locations to provide the flexibility needed to match the changing demands of the market.

Comments

See 4.36.1

Transport for the North

4.36.4 The Transport for the North (TfN) Freight and Logistics Report (2016) concludes that 850ha of land should be developed for rail and / or water connected Multimodal Distribution Parks (MDPs) between 2016 and 2033. This is required to reduce the cost of freight transport, expand market share in the logistics sector and attract private inward investment to the North.

4.36.5 The Draft TfN Strategic Transport Plan (2018) identifies that the growth of the freight and logistics sector will be crucial to support the transformational economic growth ambitions of the North. It also identifies the need for improvements in the arrangements for interchanging goods movements between road and rail, and supports the development of sites with multi-modal access.

4.36.6 The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres). The report identifies four main principles for investing in and enhancing rail freight interchange infrastructure, including north-south and east-west connectivity and intermodal connectivity. These principles will be used to guide Strategic Development Corridor studies to be undertaken by TfN to produce a prioritised programme of investment.

Comments

See 4.36.1

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Sites
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8EA

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See also 4.36.1

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12



Schematic view of congestion grid-lock at the Hermitage Green "S" Bend on Golborne Road/Parkside Road if the Proposed Parkside Link Road goes ahead.

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The Local People see the Parkside Link Road as a FLAWED solution due to being indirect over the two Inspector's decisions in 1996-98 (Unitary Development Plan) and in 2011-12 (Local Plan), as the resultant commercial traffic will impact the Local Roads with congestion, Air Pollution (Clean Air Strategy 2019), and continual noise on a 24/7/365 basis and is not a platform the Local People can approve to shape their surroundings.

12

Parkside Logistics and Rail Freight Interchange Study (AECOM and Cushman & Wakefield 2016)

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4.36.9 The Parkside Logistics and Rail Freight Interchange Study 2016 investigated delivery options for road and rail-linked logistics development on land at Parkside East and West. It confirmed, having regard to the results of consultation with relevant industry stakeholders, that there is a clear demand for a new SRFI in the North West. It also identified that, due to its geographical location and specific characteristics Parkside is uniquely placed to satisfy this demand. In particular the opportunities for rail access from the site are considered to be second to none in the North West with access being easily achievable to both the West Coast Mainline and to the East-West ('Chat Moss') line between Liverpool and Manchester. This will allow train movements to / from the north, south, east and west to be catered for at the site.

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4.36.10 The Study also identified that the development of an SRFI at Parkside would bring substantial benefits in terms of modal shift of freight movement (from road to rail) and therefore of reducing carbon emissions, when compared with the development of purely road based logistics uses of an equivalent scale.

4.36.11 Based on evidence available when it was completed, the Study indicates that the Parkside site could viably deliver a medium (8 trains per day) to large (12 trains per day) facility. The Study concludes that to deliver a viable SRFI at Parkside, land on both the west and east side of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

Comments

14

The eCO₂ of constructing the Phase 1, Phase 2, Phase 3 (SRFI) and PLR with each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 50,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes This does not include the HGV containers that on average weight (from full of cornflakes to full of potatoes) is 14tonnes per container at 68g eCO₂/tonne/kilometre for HGV, or the Freight train having between 38 containers to 50 containers per train with 38g eCO₂/tonne/kilometre The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO₂ neutral before any savings to meet Climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019".

14

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the

PO3492

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

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Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

Hide Details

From: [Redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
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Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

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Dave Tyas
Co-Chair PAG.

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St. Helens
Council

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Representation (i.e. Comment) Form**

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

Please see documents:

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2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

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Please 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:

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

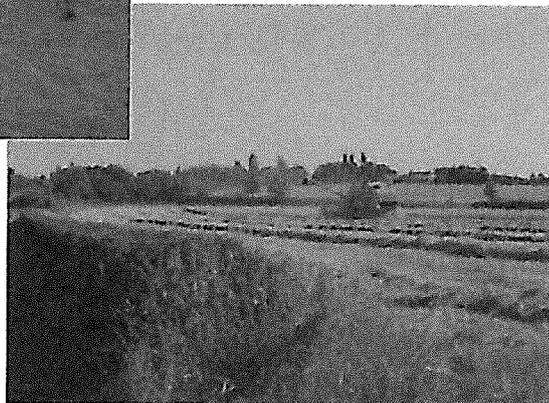
EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

these transport failures not to be sound. To which the Local People agree as it fails to be a platform the local people can shape their surroundings.

National Policy Statement for National Networks (2015)

4.36.2 The National Policy Statement for National Networks (NPS) 2015 recognises that the railway network forms a vital part of the UK's transport infrastructure that must: "... provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life".

4.36.3 The NPS strongly supports the development of an expanded network of SRFIs to help promote economic development (by responding to the changing needs of the logistics sector and addressing growth in movement of freight by rail) and addressing climate change. The NPS also stresses that SRFIs should be located near to business markets such as major urban centres or groups of centres and be linked to key supply chain routes. It suggests that SRFI capacity needs to be provided at a wide range of locations to provide the flexibility needed to match the changing demands of the market.

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PO3493

EF0059/
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to:
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13/03/2019 10:29

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Cc:
Dave Tyas, Mark Lewis
Hide Details

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Cc:

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Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
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Signature: [REDACTED]	Date: 13/03/2019
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Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

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Please continue on a separate sheet if necessary

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

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25
Policies:- LPA10, LPA04,
LPA041, LPC09, LPC10,
LPA02, LPC11, LPC12,
LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

12

The Local People see the Parkside Link Road as a FLAWED solution due to being indirect over the two Inspector's decisions in 1996-98 (Unitary Development Plan) and in 2011-12 (Local Plan), as the resultant commercial traffic will impact the Local Roads with congestion, Air Pollution (Clean Air Strategy 2019), and continual noise on a 24/7/365 basis and is not a platform the Local People can approve to shape their surroundings.

12

Parkside Logistics and Rail Freight Interchange Study (AECOM and Cushman & Wakefield 2016)

14

4.36.9 The Parkside Logistics and Rail Freight Interchange Study 2016 investigated delivery options for road and rail-linked logistics development on land at Parkside East and West. It confirmed, having regard to the results of consultation with relevant industry stakeholders, that there is a clear demand for a new SRFI in the North West. It also identified that, due to its geographical location and specific characteristics Parkside is uniquely placed to satisfy this demand. In particular the opportunities for rail access from the site are considered to be second to none in the North West with access being easily achievable to both the West Coast Mainline and to the East-West ('Chat Moss') line between Liverpool and Manchester. This will allow train movements to / from the north, south, east and west to be catered for at the site.

14
LPA 10
Ste
78 A2
85A

4.36.10 The Study also identified that the development of an SRFI at Parkside would bring substantial benefits in terms of modal shift of freight movement (from road to rail) and therefore of reducing carbon emissions, when compared with the development of purely road based logistics uses of an equivalent scale.

4.36.11 Based on evidence available when it was completed, the Study indicates that the Parkside site could viably deliver a medium (8 trains per day) to large (12 trains per day) facility. The Study concludes that to deliver a viable SRFI at Parkside, land on both the west and east side of the M6 must be allocated for the SRFI use and its associated rail infrastructure.

Comments

14

The eCO₂ of constructing the Phase 1, Phase 2, Phase 3 (SRFI) and PLR with each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 50,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes This does not include the HGV containers that on average weight (from full of cornflakes to full of potatoes) is 14tonnes per container at 68g eCO₂/tonne/kilometre for HGV, or the Freight train having between 38 containers to 50 containers per train with 38g eCO₂/tonne/kilometre The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO₂ neutral before any savings to meet Climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019".

14

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the

14
Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings. 14

The Local People look at this very very seriously as the Particulates (PPMs) from HGV vehicles and their commitment to eCO₂, NO_x, SO_x, Methane and Ammonia among other climate change and clean air products not just for this generation and their children but for their future generations and their children. The Local People do not see or approve this platform for the Local People to shape their surroundings.

Other potential employment uses

4.36.12 The strategic location of the Parkside East site next to major north-south and east-west rail routes also makes it attractive to a range of other rail-enabled uses such as the manufacture and maintenance of rolling stock, and other industrial uses that require access to rail to serve their markets. The Parkside East site will be considered suitable in principle for these uses provided they bring significant inward investment and / or local employment and training opportunities, the benefits of which would outweigh any impact that the proposal would have on the scope to develop an SRFI at this location.

Comments

14
The eCO₂ of constructing the Phase 1, Phase 2, Phase 3 (SRFI) and PLR with each 1m³ of concrete used equates to 2.38 tonnes eCO₂, and 1m³ of steel equates to 7.9 Tonnes of eCO₂ the estimate for construction of eCO₂ of the size of warehousing envisaged of size 50,000m² at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO₂ is in the millions of tonnes This does not include the HGV containers that on average weight (from full of cornflakes to full of potatoes) is 14tonnes per container at 68g eCO₂/tonne/kilometre for HGV, or the Freight train having between 38 containers to 50 containers per train with 38g eCO₂/tonne/kilometre The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO₂ neutral before any savings to meet Climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019". 14

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PO3494

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [Redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [Redacted]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EFO059

01-25



Re: PAG Response to Local Plan Draft Submission

to: [redacted]
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

[redacted]
Hide Details

From: [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]
[redacted]

3 Attachments



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



lpsd-representation-form R.Ward PAG Response.pdf



R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

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3. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.

EFO059 /
01-25



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [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)

EF0059
01-25



St. Helens
Council

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

Ref: LPSD

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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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

Yes (Via Email)

No

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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 LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

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**Thank you for taking the time to complete and return this response form.
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LPC06, LPD09, ~~LPD08~~.
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



Web: parksideactiongroup.org.uk

Email: <mailto:help@parksideactiongroup.org.uk>

4.36.13 The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.

24

24

Comments

This proves as the Newton Park Farm Complex on Parkside West access via Newton Park Drive is shown to be required by the Phase SRFI, by having been removed in the Phase 1 masterplan(s) and a new transport access and utilities access from the Newton Park Farm Complex links and is dependant on the Phase 1, Phase 2 and the Parkside Link Road (PLR) in order. Then the action of doing this planning alteration means that the SRFI Rail Spur line being a part of the 60Ha threshold of a SRFI use as stated in paragraph 4.36.13 then Newton Park Farm alteration to accommodate the SRFI Rail Spur in order for the Planning Act 2008 to perform an environmental Statement under the Directive 2014/52/EU the phases: Phase 1 Phase 2 and the PLR are a part of the Nationally significant Infrastructure Project under the said Act.

24

24

Justification for removing Site 7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

Policy
LPA 10
7EA-8EA

15

15

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site.

15

15

Comments

(red text in 4.36.16 above to emphasise reasoning)

As there is no policy for 8EA then the policy for 8EA is Policy CAS 3.2 and as 8EA has no SRFI fully developed, does not comply with CAS 3.2. In fact, neither 7 EA or 8EA comply with CAS 3.2 then according to CAS 3.2 with respect to Green Belt the exceptional

circumstances The "subsequent revision" i.e. St Helens Local Plan Submission Draft January 2019, has been preceded by:

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

Also 8EA has not met as shown in CAS 3.2:

"1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;" i.e. the application(s) Phase 1, Phase 2 and the Parkside Link Road have not been approved so Policy CAS 3.2 is not justified, but if the plans had been approved using CAS 3.2, then Parkside west still can not be taken out of Green Belt due to "Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

What SHC is doing here is is akin to the judgment [2012] EWHC 1889 (Admin) Case No: CO/12156/2011 where the press transcripts of the hearing sessions:

<http://www.placenorthwest.co.uk/news/archive/11721-judicial-review-opens-into-amazon-widnes-shed.html>

<http://www.placenorthwest.co.uk/news/archive/11729-halton-defends-action-over-amazon-widnes-shed.html>

<http://www.placenorthwest.co.uk/news/archive/11763-amazon-widnes-hearing-closes.html>

<http://www.placenorthwest.co.uk/news/archive/12008-halton-loses-amazon-widnes-shed-judicial-review.html>

quoted:

"Kolinsky said the application by Prologis did not refer to the UDP condition of phasing brownfield sections of Ditton ahead of greenfield. He added that the Halton planning officer's report to the planning committee had 'air-brushed out' analysis of conditions set in the UDP.

His Hon Judge Gilbert QC, hearing the case, said: "I find it quite baffling that a professional developer of the size of Prologis did not address the most important planning policy [regarding the application]. It's sad."

Halton's planners said in witness statements there can be flexibility in the phasing of the development of the logistics park next to the Mersey.

The judge twice likened this idea of flexible phasing to Eric Morecambe playing Grieg's piano concerto - a reference to the episode of Morecambe & Wise in 1971 when Morecambe attempts to play Grieg for pianist and conductor Andre Previn. Previn complains he is playing all the wrong notes but Morecambe declares that he is in fact playing all the right notes but not necessarily in the right order."

SHC are trying just like in the above court case to change the conditions of the local plan: to remove from green belt the area before the land has been developed either partly or

15 fully (i.e. no special circumstances proven legally) when the policy categorically states that the SRFI is fully developed on site before any review of green belt boundaries. Where in fact no development has even occurred though 3 applications are under the legal planning system using Policy CAS 3.2, to which all three planning applications have failed to follow. So SHC can not even follow their own current adopted Local Plan Policy CAS 3.2 knowingly: (red text to emphasise reasoning) 15

"Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision."

The Local People will not sanction this section due to SHC not even following their own Policy. This means the Green Belt sections and figure 4.4 (see map 2) must be totally struck out of the St Helens Local Plan Submission Draft January 2019 as follows:

~~"Justification for removing Site 7EA from the Green Belt~~

15 ~~4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).~~ 15

~~4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.~~

~~4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site."~~

15 7.4 Policy LPC 06: Biodiversity and Geological Conservation 15

Policy LPC06: Biodiversity and Geological Conservation

European sites

1. Development that is likely to have a significant effect (either alone or in combination with other plans or projects) on one or more internationally important site(s), including any areas of supporting habitat that are functionally linked to the site(s), must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided, or where this is not possible, be mitigated to protect the integrity of the site(s). Development that would adversely affect the integrity of one or more internationally important site(s) will only be permitted where there are no alternative solutions or there are imperative reasons of overriding public interest, and where suitable compensatory provision has been made. Any mitigation or compensatory provision must be assessed in a project-related Habitats Regulations Assessment and be fully functional before any likely adverse effect arises.

Other protected sites, habitats and species

2. Development that would cause significant harm to a Site of Special Scientific Interest (SSSI), Local Wildlife Site, Local Nature Reserve, Local Geological Site, Priority Habitat(s), legally Protected Species and / or Priority Species, that would not be adequately mitigated or as a last resort compensated, will be refused.
3. Development that would be likely to cause any harm to ecological or geological interests will only be permitted in:
 - a) Sites of Special Scientific Interest where there are no alternatives and where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) ecological network; and
 - b) Local Sites (Local Wildlife Sites, Local Nature Reserves and Local Geological Sites) and Priority Habitats: where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site (or Priority Habitat) and its broader contribution to the LCR Ecological Network.

Mitigation, replacement or other compensatory provision

4. Where necessary to avoid harm, appropriate mitigation, replacement or other compensatory provision will be required. The location of such measures will be targeted, using the following sequential approach (with (a) being the preferred approach and (d) being the least preferred):
 - a) on the development site;

- b) locations within the immediate locality and /or supporting LCR Ecological Network;
- c) locations that fall within the LCR Nature Improvement Area and within the Borough; and lastly
- d) locations that fall within the LCR Nature Improvement Area but outside the Borough.

Evidence requirements

- 5. Development proposals that would affect a nationally or locally designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and / or compensation proposals, and of any proposed management measures.
- 6. Designated sites are shown on the Policies Map. Plan policies will also apply to any other sites that may be recognised during the Plan period as being of nature conservation importance, including land provided as compensation.

Internationally important sites

15 7.6.3 Paragraph 1 of Policy LPC06 sets out the requirements for developments that fall within St. Helens Borough but that may affect the internationally important nature sites in nearby districts. These sites include the sites of international nature importance listed in paragraph 7.6.1 above. Any development that may affect such a habitat (for example by affecting an area of supporting habitat, some of which cover parts of the Borough) must be accompanied by sufficient information to enable a Habitat Regulations Assessment to be undertaken. This process includes 'Appropriate Assessment' of any significant effects and specific monitoring and / or mitigation or compensation where required. Alternative solutions to be considered may include alternative locations for the proposed development, different scales or designs of development, alternative processes, or not going ahead with the development and should be considered at the earliest stage. Planning proposals should also consider potential impacts arising from, for example, other sources of pollution, increased human disturbance (including the impact of cumulative recreational pressure on the internationally important sites) or hydrological changes. 15

15 7.6.4 The Local Plan includes several site allocations for development that have been identified (in the Habitats Regulations Assessment of the Plan) as being most likely to provide functionally linked land connected to an internationally important site. These include: sites 6EA, 7EA and 8EA (allocated for employment development), site 8HA (allocated for housing) and sites 1HS, 4HS, 5HS, 7HS and 8HS (safeguarded for housing development). It is possible that other sites may also provide such habitat. Where it is possible that a site may provide supporting habitat, proposals for development will be required to contain sufficient evidence (such as a wintering birds survey), to enable their significance to the European 15

15 sites to be ascertained, and any necessary mitigation or compensation measures to be identified.

15

Comments

(highlighted text in 7.6.4 above to emphasise reasoning)
Remove 8EA and replace with LOCAL 10LP

7.13 Policy LPC09: Landscape Protection and Enhancement

Policy LPC09: Landscape Protection and Enhancement

1. Proposals for new development must, as appropriate having regard to their scale and nature:
 - a) seek to conserve, maintain, enhance and / or restore any landscape features that are important to the character of the local area;
 - b) demonstrably form the best option for meeting the aims of the development whilst minimising impacts on the landscape and appearance of the area and respecting local distinctiveness;
 - c) be informed by relevant guidance including the St.Helens Landscape Character Assessment and the Merseyside Historic Character Study; and
 - d) include assessments of the impact of the proposal on the landscape and appearance of the area, carried out in accordance with any relevant best practice guidelines.
2. Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm. Where the development would (despite any such measures) cause significant harm but also bring significant benefits, suitable compensation measures may be sought. If significant harm cannot be avoided, suitably mitigated or compensated, planning permission will be refused unless the development would bring exceptional benefits that would outweigh the harm.

Policy
LPC09
7EA
8EA

16

16

7.15 Reasoned Justification

7.15.1 The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The European Landscape Convention was ratified by the UK Government and came into force in 2007. The Convention acknowledges that the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas. The Convention's definition of landscape protection is "to conserve and maintain the significance or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and / or from human activity."

PO3495



Local Plan
Vicky Gregory
to:
planningpolicy@sthelens.gov.uk
13/03/2019 11:17



1 Attachment



lpsd-representation-form.doc

Please find attached my comments on the local plan.

Kind regards
Vicky Gregory



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Victoria	First name:
Last Name: Gregory	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Park Road North Newton le Willows	Address:
Postcode: WA12 9TF	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

13th March 2019

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

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

Yes (Via Email) **YES**

No

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	Policy LPA10: Parkside East	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Y	Habitats Regulation Assessment	Y
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

- This was never part of the colliery site.
- There is significant public opposition to this proposal.
- There will be an increase in air pollution as this area has limited public transport access and will require

employees to drive to the site.

- This is landscape of great greenbelt significance, there is a beauty to the area, it has a rugged character and charm, it is an area of historical importance and most importantly for natural conservation.
- There has been a lot of work in recent years rehydrating the moss and improving the natural habitat. Any development near the Moss will have a direct impact on the moss land and the birds and animals that live there and should be preserved for future generations. Furthermore there are listed building on the site that would require demolition.
- It is well used by residents in Newton, Lowton, Golborne and Winwick.
- It is not a Brownfield site and therefore should not form part of the Parkside Development and shouldn't be designated an employment area as there are other areas of the development more suitable. Moreover, the strategic significance of this land is very much dependent upon the success of the other phases of the project.
- **Once it has gone, it has gone.**
- **St Helens has so far not been able to find a Company prepared to build & operate out of a strategic rail freight terminal & this land should not be released only to be used for even more warehousing.**

01

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.

Agreement not to release the land on the east side of Parkside Road for environmental reasons..

Please continue on a separate sheet if necessary

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

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

PO3496



PAG Response to Local Plan Draft Submission - Biodiversity Report

[Redacted]

to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:18

[Redacted]

3 Attachments



lpsd-representation-form R.Ward PAG Response inc Biodiversity.pdf



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report).pdf

Please find attached SHC response form and supporting Biodiversity document on behalf of Parkside Action Group (PAG).

Regards

Richard Ward (PAG Member)

(sent on behalf of Dave Tyas and Mark Lewis, Co-Chairs of PAG)

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.



St.Helens
Council

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

Ref: LPSD

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <input type="text"/>
-----------------------	----------------------------

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

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Yes (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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St.Helens Council
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Victoria Square
St.Helens
Merseyside
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report).pdf

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes , I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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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: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address: Postcode:
Postcode: WA2 8SJ	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [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)

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Biodiversity Report, March 2019



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3	Parkside East and West Biodiversity Report	3
4	Biodiversity Parkside West and East	4
5	Recognition within Local Plan Submission Draft January 2019.....	5
6	Recommendations.....	5

1. Purpose

1.1 This document provides a Biodiversity Response to the St Helens Local Plan Submission Draft January 2019.

2. Introduction

2.1 PAG was formed in 2006 to protect the land around the site of the former colliery from unsuitable development.

3. Parkside East and West Biodiversity Report



Barn Owl photographed by local enthusiasts.

Barn Owl, regulars on both Parkside East and West due to the grassland habitat which contains their food source, mice and voles.

There has been for some years a Barn Owl protection scheme with the assistance of local farmers. Once very rare this beautiful and iconic species has gained a foothold in the area.

All five species of UK owls can be found on Parkside East / West along with approximately 120 species of bird in addition to many mammals such as Roe Deer, Brown Hare, Foxes, Weasels, and Stoats.

Evidence of badgers is in the area: Where a dead badger was found killed on Winwick Lane in 2015; in addition to sets found in nearby Croft.

There are many species of insect including the rare Black Darter dragonfly and a number of rare plant species including the Marsh Gentian found in only two other places in the UK.

The area is popular with local wildlife enthusiasts and the public alike with much of the area public footpaths. The area forms part of the greater Manchester bird recording area

(RODIS- Greater Manchester Local Record Centre) Particularly Barrow Lane and Highfield Moss which are within the greater Manchester recording area. The very popular Manchester

Birding Website is a regional website where rare bird sightings are posted every day by enthusiasts and county recorders. The website has sections on Barrow Lane, Highfield Moss and Winwick area around the site.

4. BIODIVERSITY PARKSIDE WEST AND EAST

Other than a brief period 1957 – 1992 where a small area of the land was used for mining, for centuries the land on Parkside East and West has been either farmed or is wild countryside.

It is protected green belt status and is alongside Highfield Moss SSSI one of the last mire marshlands in Lancashire.

Highfield Moss SSSI is managed by natural England and Lancashire Wildlife Trust and in recent years both have undertaken substantial development to preserve the moss land by which drainage and hydrology is critical. Therefore, any nearby commercial development clearly has a requirement to be sensitive to that aspect.

Parkside East and West effectively cover most of the green belt between Newton-Le-Willows, Kenyon and Winwick an area between the three boroughs Warrington, Wigan and St Helens.



Endangered Brown Hare

Endangered Brown Hare – Parkside East and West of the very few local areas where these can be found due to habitat loss in the region. Brown Hares are nationally protected.

5. RECOGNITION WITHIN LOCAL PLAN SUBMISSION DRAFT JANUARY 2019

Effectively the local plan treats this as wasteland (concentrating on the relatively small area of what remains of the 1957 colliery) the rest an absolutely

Vast area several miles in circumference of woodland, scrub, marshland and grassland.

The nature and scale of is not reflected in the local plan rendering the plan “ineffective” and not “Positively prepared”.

6. RECOMMENDATIONS

1 – The draft local plan should be amended to reflection recognition of the area of Parkside East and West and its habitat and scope for local biodiversity. From context of “net gains for nature” and local Health and well being.

2 – The adjusted local plan should have formal provision for future Biodiversity Planning in areas like Parkside East and West where very large scale development is planned on sensitive countryside.



Local Roe Deer hind and fawn.

Roe Deer frequently seen and breed on Parkside East and West.

PO3497

E10065



Wigan Council response to the St Helens Borough Local Plan 2020-2035

N.Clarke

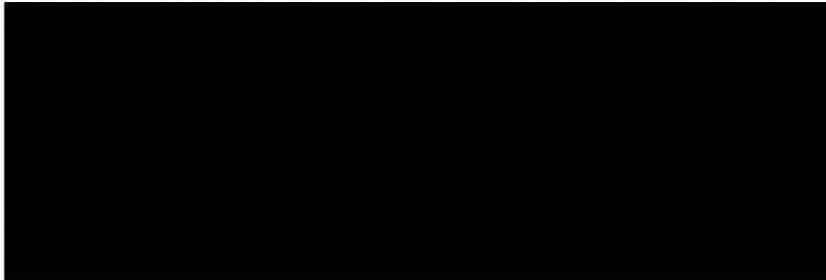
to:

planningpolicy

11/03/2019 18:34

see attachment

- ① - LPA04
- ② - LPA04.1
- ③ - LPA06 (res)
- ④ - LPA06 (HATIF)
- ⑤ - LPA07
- ⑥ - LPA10



1 Attachment



Letter and reps on St Helens LP 11 Mar 19.pdf

Please note that Wigan's Council's representations on the St Helens Local Plan have been approved by the Council's Portfolio Holder for Planning and Environment but that the required 5 working days until that decision can be enacted have not passed and will not have passed until after your deadline of 13 March. They are therefore submitted on that basis and we will advise accordingly of the status once that time has passed.

Dear [REDACTED]

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. The related representations concerning them are attached and set out below, and cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by short alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

Marie Bintley

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]
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[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]

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.

E100065

Overall the proximity of the site to the borough boundary and the issues of cross-boundary impacts should be acknowledged more explicitly in the plan.

PO3498

ELD169



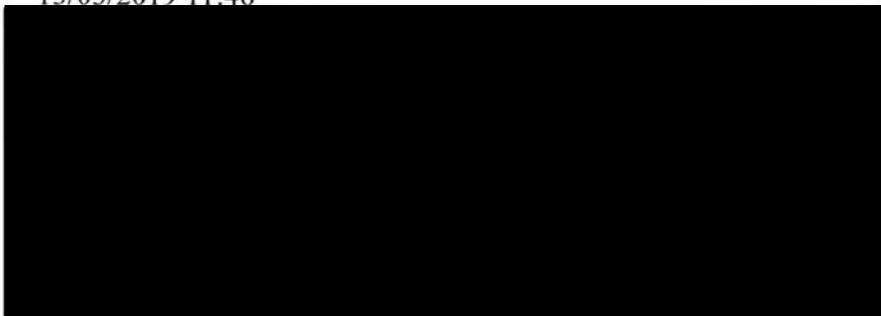
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation

Peter Black

to:

planningpolicy

13/03/2019 11:46



① - LPA04

② - LPA04-1

③ - GBR

④ - LPA06

⑤ - LPA10

1 Attachment



St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black

Blackfryers Planning and Environmental Consultants

9 Ecclesbridge Road

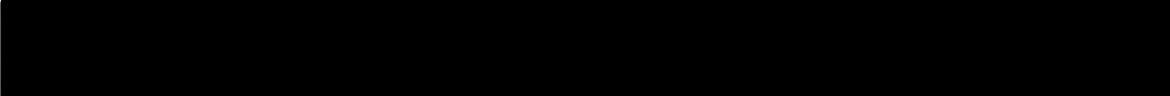
MARPLE SK6 7PF



St Helens Local Plan – submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX	Croft Parish Council Clerk to the Council Mr. M. Pope Unit K1, Taylor Business Park Warrington Road, Risley WA3 6BH
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But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide *'balanced regeneration'* or *'sustainable growth'* or provide *'high quality new employment'*. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.] ①

St Helens was once a world leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.] ①

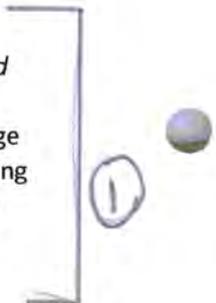
This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough. ✓

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

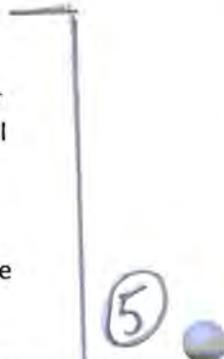
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Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing rail-based logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

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Final

'reasoned justification' for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

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The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

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The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards 'just in time' logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.

PO3499

ELD169



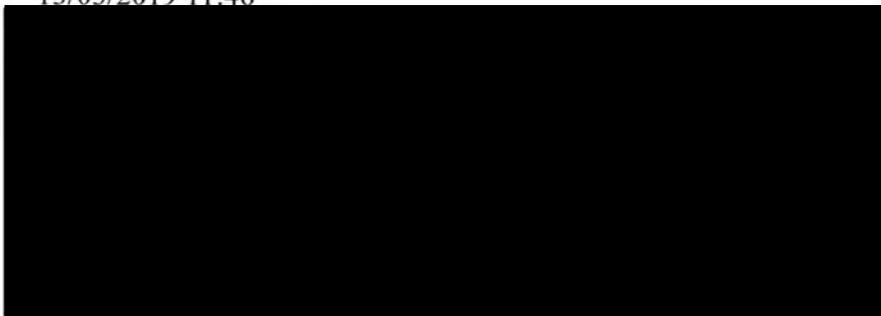
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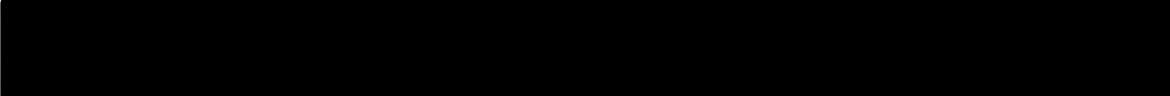
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St Helens Local Plan – submission draft

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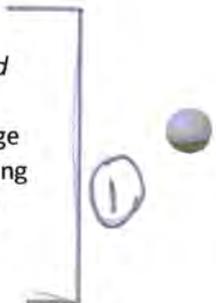
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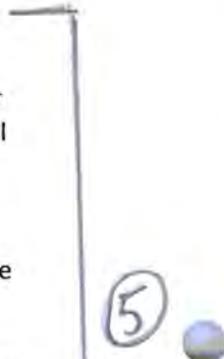
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PO3500

ELO267

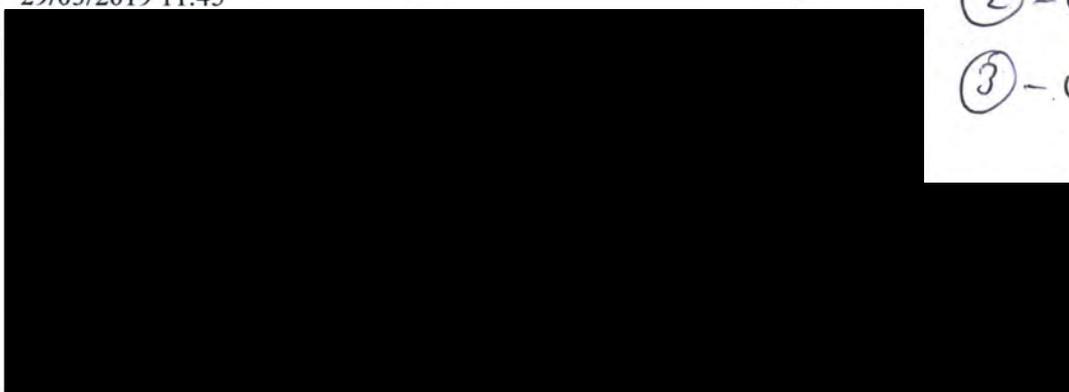


St Helens Local Plan - Submission Draft
Morgan, Anne
to:
planningpolicy@sthelens.gov.uk, [REDACTED]
29/03/2019 11:45

① - LPA04

② - LPA06

③ - LPA00



1 Attachment



Letter to [REDACTED] re St Helens Local Plan March 2019.pdf



Please find attached a letter from the Mayor of Greater Manchester in relation to the St. Helens Local Plan Submission Draft. If you would like to discuss any of the issues raised please do not hesitate to contact me.

Many thanks,

Anne

Anne Morgan
Head of Planning Strategy
Greater Manchester Combined Authority
Churchgate House, 56 Oxford Street, Manchester M1 6EU



www.greatermanchester-ca.gov.uk



This email is confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions present are solely those of the author and do not necessarily represent those of the Greater Manchester Combined Authority (GMCA). The contents of this email and any replies to this email may be required to be disclosed under The Freedom of Information Act. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error can you please delete it and notify the sender by telephone on 0161 736 5866. GMCA has made every effort to ensure attachments are free from viruses. However, neither the Authority nor the sender accepts any responsibility for viruses and it is your responsibility to scan any attachments. Mimecast

ANDY BURNHAM

**MAYOR OF
GREATER
MANCHESTER**

[REDACTED]
Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens
WA10 1HP

21st March 2019

Dear [REDACTED]

St Helens Borough Local Plan 2020-2035

I am writing to you to register my longstanding concerns about the level of logistics development being proposed around the M6, particularly J23 and the potential impact of this upon residential communities in Lowton, Golborne and Ashton-in-Makerfield.

I know that Wigan Council share these concerns and have submitted holding objections to the planning applications at Haydock Point and Parkside West, on the grounds of traffic impacts and air quality. I fully support Wigan Council in their comments requiring the policies for sites adjacent to the Wigan border to acknowledge this proximity and to protect the amenity of Wigan residents, particularly in terms of traffic and air quality.

The M6 is already at saturation point and it is hard to see how any further development can be sustained without major investment in capacity.

Policy LPA06 Land north east of Junction 23 M6 (South of Haydock Racecourse), Haydock

It is good to note that whilst this site was allocated for employment development in the previous version of your local plan, Policy LPA06 now proposes that it is safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period. The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review. This is better than the wholly unacceptable employment development proposed in the previous version of the plan, given the pressure it would add to Ashton-in-Makerfield which is routinely at a standstill during the rush hour. Unless there is now direct access to the M6 – avoiding any pressure on local roads or J23 – then I will continue to oppose this development.

Policy LPA10: Parkside East

I have previously supported the proposal to develop a Strategic Freight Rail Interchange (SFRI) facility at Parkside. I am concerned however about the potential to develop this site for B2/B8 uses which are not linked to the SFRI as road served freight in this location is likely to load traffic onto the East Lancashire Road at Lane Head which has the potential for impacts of air quality, noise and visual amenity on local residents in Wigan Borough. As an absolute minimum, this proposal must include a condition that it adds no more traffic to local roads in Lowton/Lane Head and that access to it be only from the M6.

} (3)

I trust that you will consider my comments.

Yours sincerely



ANDY BURNHAM
MAYOR OF GREATER MANCHESTER

