

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO3601 – PO3700

SEPTEMBER 2020

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PO3601

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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]

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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: 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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

19-22 Policies LPC10, LPC12, LPC06, LPC11 Sites 7EA & 8EA

7.22 Policy LPC12: Flood Risk and Water Management

Policy LPC12: Flood Risk and Water Management

Flood Risk

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
   a) the St.Helens Strategic Flood Risk Assessment;
   b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
   c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
   a) within flood zones 2 or 3; or
   b) on a site of 1 hectare or larger within flood zone 1; or
   c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
   d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
   a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
   b) any applicable Exception Test required by national policy has been passed; and
   c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):

19-22

19-22

a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;

b) protect heritage assets (such as buried archaeology);

c) be fully described in the development proposal; and

d) be funded by the developer, including long-term maintenance.

5. Any proposal for major development[56] on a site that would abut, run alongside or straddle any watercourse[57] in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.

6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):

a) an adequate soakaway or other form of infiltration system;

b) an attenuated discharge to watercourse;

19-22 19-22

56 'Major development' in this context has the same meaning as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, or any Order which amends or supersedes it. It includes, for example, proposals for 10 or more new dwellings

57 The definition of "watercourse" in this policy is the same as that in the Land Drainage Act 1991 [section 72(1)] and includes "Main Rivers" identified by the Environment Agency and also "Ordinary Watercourses"

c) an attenuated discharge to public surface water sewer;

d) an attenuated discharge to public combined sewer.

9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.

10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.

11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.

12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.

13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.

Protection of water and waste water assets

14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.

19-22 19-22

7.24 Reasoned Justification

Flood Risk

7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.

7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.

7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

Sankey Catchment Action Plan

7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.

7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, "safeguarding land from development that is required (...) for current and future flood management".

7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

Comments

19-22 19.22

Flooding from the proposed policy shown as site 8EA or policy CAS 3.2 on Parkside west the southern border is Hermitage Brook. The boundary between the borough of St Helens and the Borough of Warrington. The Hermitage Brook is the natural water drainage for the land in Newton Park the 8EA site. This brook is on a regular basis overflows its banks nearly every time it rains due to the water from Newton Park filtering naturally in to the ground the water that does not seep in to the ground flows over the land into Hermitage Brook. Three views of normal overnight rainfall and the resultant Hermitage Brook capacity:







19.22 19.22

19-22 This is without the proposed use of surface water drainage from the 8EA development. 19-22
The development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available to absorb the rainfall on Newton Park. The Roads and Roof areas will according to the Phase 1 proposed drainage scheme have drainage directed in to the Hermitage Brook to solve SHC 8EA surface water problem. SHC state there will be ponds, but the ponds to cater for the size of warehousing purported will not cope. This means the Hermitage Brook will burst its banks every time it rains just to cater for the warehouse roof and road drainage. The result will be the A49 banking will be permanently under water that will with time undermine the A49 foundations. At present the culvert under the A49 can just cope but not with the Warehousing. With the valley permanently under flood situation the flora and fauna will be affected as the roots will die due to being over watered. This SHC has not considered either in the application(s) or the St Helens Local Plan Submission Draft January 2019. The effect of flooding of Hermitage Brook is a Cross Border issue with Warrington Borough Council. This means additional wording to prevent Hermitage Brook from flooding needs to be seriously addressed as wildlife rely on the Flora and Fauna.

Also as the Hermitage Brook is the Key area as Identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the SHC side of the valley but the Warrington Borough Council side to which has not been addressed.
So not just this Policy LPC12 is flawed, the other affected policies are also flawed due to the associational link of the Hermitage Brook. These policies that are also flawed are: LPC06; LPC10; LPC11; and LPC12.

Therefore, not a platform for Local People to shape their surroundings.

PO3602

EL0/64

Natural England's response to St Helens Borough Local Plan 2020-2035 Submission Draft

Bohan, Aurelie

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:52

(1) - LPD09

(2) - LPC06

(3) - LPC06

[redacted]

1 Attachment

Natural England's response to St Helens Local Plan 2020_2035 Submission Draft.pdf

Dear [redacted]

Please find attached Natural England's response to the consultation on Natural England's response to St. Helens Borough Local Plan 2020-2035: Submission Draft.

Best wishes,
Aurelie

Aurélie Bohan
Strategic Coastal Lead Adviser
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

Natural England
2nd Floor
Arndale House
The Arndale Centre
Manchester
M4 3AQ

[redacted]

Date: 13 March 2019
Our ref: 271075
Your ref: St.Helens Borough Local Plan 2020-2035: Submission Draft

NATURAL ENGLAND

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

[redacted]

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

BY EMAIL ONLY

Dear [redacted]

Planning consultation: St. Helens Borough Local Plan 2020-2035: Submission Draft

Thank you for your consultation on the above, which was received by Natural England on 18th January 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England provided previous advice on the St. Helens Local Plan Preferred Options (28th January 2017) and acknowledge amendments have been made to the Local Plan in order to address some of Natural England's previous comments. This letter provides our formal response on the soundness and legal compliance requirements of the pre-submission draft.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED

The Habitats Regulations Assessment (HRA) of St. Helens Borough Local Plan has identified potential effects in relation to air pollution, functionally linked land and recreational disturbance. Natural England advise that further detail is needed to outline appropriate mitigation should an allocation result in impacts at project stage.

Without the assurance of suitable mitigation measures, the allocations are at risk of becoming undeliverable at project stage if the Habitats Regulations cannot be satisfied. While we do not expect significant detail at this stage, we would expect the relevant policies to contain details of the type of mitigation measures deemed appropriate to remove impacts and a level of confidence that they can be delivered. Without this detail we consider the plan currently **unsound** with regard to the 'effective' test and we also raise legal compliance issues with regard to the Habitats Regulations.

We welcome that St. Helens Borough Local Plan 2020-2035 contains strong policies, particularly relating to key issues such as air pollution and functionally linked land but we are seeking assurance that mitigation is available and deliverable should it be required at project level HRA. In addition, clarity is sought on how St. Helens will address recreational pressure until such a time as a Liverpool City

Region wide Recreational Mitigation Strategy is developed and adopted. We have laid out further detail on this below.

Habitats Regulation Assessment

Air pollution

Natural England welcomes the assessment of air pollution impacts on European designated sites, although we feel that further work could have been done to equate the increase in cars likely to travel along the M62 motorway as a result of housing allocations. When looking at clarifying the number of additional cars using the M62 motorway we recommend that you familiarise yourselves and make reference to the *Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [2017] EWHC 351 in terms of in-combination effects relating to air pollution.

We are minded to agree with the conclusion of the HRA that the Plan when considered alone will not result in adverse impacts upon the integrity of the European designated sites. We appreciate that it is difficult to assess and mitigate air pollution at plan level and are content that allocations should consider this at a project level HRA, but we would like to be assured that mitigation exists and is deliverable in line with project level HRAs over the timeframe of the plan. Without these assurances the HRA cannot conclude that there will be no in-combination impacts to designated sites as the Plan is relying on project level HRAs, as stated under section 6.4 in the HRA (page 46);

"there is also the need to ensure that project-level analysis of potential air quality impacts (and if necessary, project-level mitigation) is required. This will require particular projects that are likely to result in a substantial increase in traffic flows to devise project-specific mitigation beyond the strategic 'in combination' air quality improvement measures being included in the Local Plan."

As there is a reliance on project level HRA, we would expect to see reference to the type of mitigation measure available and their deliverability set out in Policy LPD09: Air Quality within the Plan.

(1)

Functionally Linked Land (FLL)

Natural England advise that more certainty is needed in relation to the availability of suitable mitigation land should it be required at project stage. This is particularly relevant for those allocations identified in the HRA as having the potential to result in an adverse impact upon the integrity of the populations of European designated sites;

- 6EA, 7EA and 8EA allocated for employment development,
- 8HA allocated for housing,
- and sites 1HS, 4HS, 5HS, 7HS and 8HS safeguarded for housing development.

(2)

We support the Council's commitment to update the Biodiversity Supplementary Planning Document (SPD) which will look at setting out strategic proposals to work with landowners to maintain and enhance FLL within the borough, as stated in the HRA under section 5.3.3 (page 34). We advise that the Biodiversity SPD needs to be clearly referred to in the Plan. If this SPD is the proposed mechanism for delivering mitigation land as a result of loss of FLL from allocations in the Plan then this needs to be clear within the plan. In addition to stating that the SPD will be the framework for mitigation it should include the time frame for the development of the SPD, the availability of suitable mitigation sites and the arrangement for allocation sites that come forward prior to the completion of the SPD.

Recreational Pressure

Natural England welcomes the strategic approach across the Liverpool City Region in developing a Recreation Mitigation Strategy (RMS) to look strategically at the impacts of recreational pressure in the region on European designated sites and their features. However, until such a strategy has been developed and adopted it does not constitute mitigation for impacts on European designated sites that arise from recreational pressure in-combination with other plans or projects. We reiterate our advice (dated 28th January 2017) that the Council needs to consider what happens in the interim before the RMS is finalised and how you will consider in-combination impacts on European Sites prior to this. We advise that until the RMS is developed and adopted a borough wide strategy for addressing the in-combination impacts from recreational pressure is included in the Local Plan. The relevant

(3)

PO3603

EL0/64

Natural England's response to St Helens Borough Local Plan 2020-2035 Submission Draft

Bohan, Aurelie

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:52

(1) - LPD09

(2) - LPC06

(3) - LPC06

[redacted]

1 Attachment

Natural England's response to St Helens Local Plan 2020_2035 Submission Draft.pdf

Dear [redacted]

Please find attached Natural England's response to the consultation on Natural England's response to St. Helens Borough Local Plan 2020-2035: Submission Draft.

Best wishes,
Aurelie

Aurélie Bohan
Strategic Coastal Lead Adviser
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

Natural England
2nd Floor
Arndale House
The Arndale Centre
Manchester
M4 3AQ

[redacted]

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(3)

Policy should be worded in such a way that this interim position will be superseded when the RMS is finalised and adopted.] (3)

[redacted]

Yours sincerely

Stephen Ayliffe
Team Leader
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

PO3605

PF1347

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

1420

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: 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:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☑ (Via Email)	No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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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	LPC06	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 ☐	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

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 policy to target as our representation, but we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4PGBP_074 and its allocation for housing as we believe the councils position is flawed. All the arguments we wish to put forward are within the attached documents. Which is - Assessment of the St Helens local Plan and green belt review and phase one 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:

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 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. 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). 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.

PO3606

PF1348

St.Helens Council

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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: 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

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

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Please tick as appropriate

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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.

PF1345.pdf

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. 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.

PO3607

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

(1) - LPA01
(2) - LPA02
(3) - Green 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/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

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

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

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

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

Bold and Clock Face Village Action Group.

12 MAY 2019

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: 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 Postcode: WA9 4FZ	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	13.05.19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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 ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 LPC06: Biodiversity and Geological Conservation

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

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

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

Policy LPC06: Biodiversity and Geological Conservation

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPC06 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 2018-2021[1] as an adopted development plan document should play a key role in guiding decisions.

The Bold Forest Park Area Action Plan (BFPAAP), Policy BFP ENV2: Ecological Network
St Helens Council and its project partners will within a woodland and farming framework enhance biodiversity in Bold Forest Park.

Objective 5 BFPAAP
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.

Policy LPC06 Section 2 states,

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.

This Policy becomes more significant when considering sites within the Bold Forest Park. The Policy itself makes no specific reference to the BFPAAP. The Group argue the BFPAAP priority

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

habits and species, as listed in the plan[2], should be a material consideration and accounted for. The natural environment and wildlife offering can be a huge draw to visitors of the Forest Park. It is critical any development within the Park boundary ensures a net gain to biodiversity so as not to compromise the park attractiveness to visitors. It will be difficult to mitigate within the Park as the boundary is not infinite. Community consultation carried as by URS as part of the development of the Action Plan, strongly indicated the publics interest in the natural environment.[3]

The BFPAAP saw one of the key issues in developing the Forest Park Action Plan as Safeguarding and Enhancing the Environment.[4] 'A high quality environment is an essential ingredient of a successful outdoor leisure attraction. This includes a strong sense of place and local character.'[5] One area that was seen as key to increasing and conserving the wildlife within The Forest Park was the reducing fragmentation, especially in the farmland landscape by increasing connectivity through hedgerows and field margin and woodland planting. It was highlighted however, that 'care needs to be taken not to displace ground-nesting birds.'[6]

Many of the priority species and habitats within the Forest Park as set out in the Action Plan, are located within the farming landscape. Priority habitats found within 4HA and 5HA include, unimproved grassland, ponds and wetlands, hedgerows and field margins. Priority species that have been recorded within 4HA include, Great crested newt, Brown Hare, Corn Bunting, Brown Long Eared Bat, Noctule Bat, Myotis sp Bat, Pippistrelle Bat, Water Vole, Dragonflies, Skylark, Bluebell, Grey Partridge and Lapwing.

The Monitoring Framework for the Bold Forest Park Area Action Plan outlined how the performance of the Area Action Plan would be monitored. Key indicator 4 is listed as 'Environmental enhancements in Bold Forest Park, which include:-
b) Changes in Priority Habitats in the Forest Park
c) Number of Lapwing.

Investigations with Mersey bio-bank show some data has not been updated in some time. Following the community and local business involvement with the Bold Area Action Plan, steps have been taken to manage some of the land more appropriately in line with wildlife and habitat conservation, specifically in relation to the grassland and horse pasture within site 4HA. It was felt that more up to date data was essential in understanding the areas biodiversity importance, especially in the context of the priority habitats and species as listed in the BFPAAP. The Group feel this should have been completed as part of the review prior to allocation of the land due to it's significance within the BFPAAP. A Partial Phase 1 Habitat Survey has been completed, the full report is included in the Appendix. The findings of the survey show, 'this land parcel plays a significant role in the biodiversity of the area.'[7]

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[2] Bold Forest Park Area Action Plan, Adopted 2017, Page
[3] Bold Forest Park – Local Business and Community Consultation Report, URS, 2012, Page 5
[4] Bold Forest Park Area Action Plan, Adopted 2017, Page 15, 6.4
[5] Bold Forest Park Area Action Plan, Adopted 2017, Page 15, 6.4.1
[6] Bold Forest Park Area Action Plan, Adopted 2017, Page 16, 6.4.11
[7] A report on the findings of a Partial Phase 1 habitat survey and three bat transects

Key Priority Species of Farmland birds were found to be present and breeding in significant numbers over the whole site, Lapwing (Vanellus vanellus), Skylark (Alauda arvensis), Grey Partridge (Perdix perdix), Yellowhammer (Emberiza citronella) and Snipe (Gallinago gallinago) in particular. The area was shown to be a key commuting and foraging area for bats and raptors. Common Pipistrelle; Soprano Pipistrelle; Noctule; Buzzard and Kestrel were observed.

Key Indicator 4 – Lapwing, breeding in field at rear of Crawford St, Frenchfields Cr.

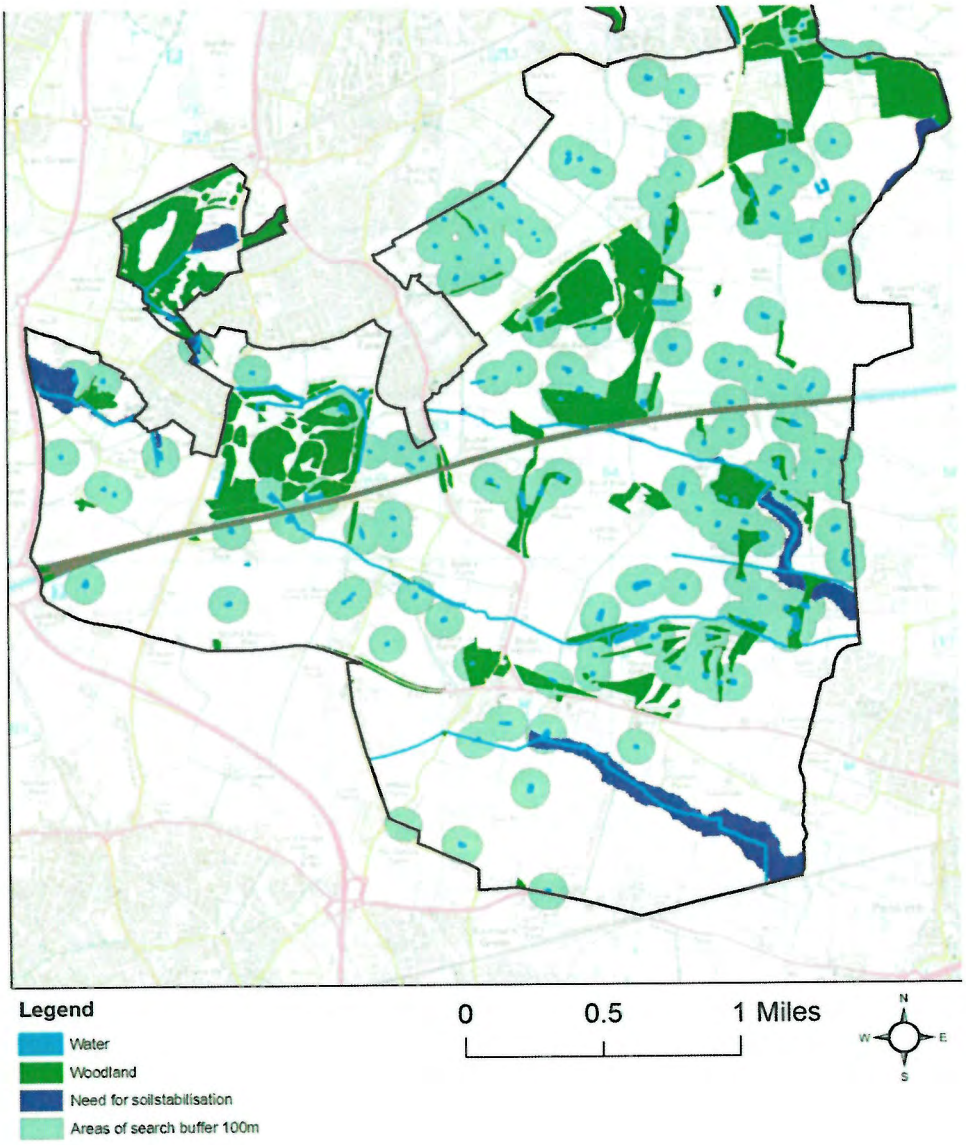




The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds, many of which can be described as forming a cluster, surrounded by mature deciduous trees. All the ditches observed had some standing water present. Almost all the arable fields show a 3 – 5m buffer zone of grassland round their margins.

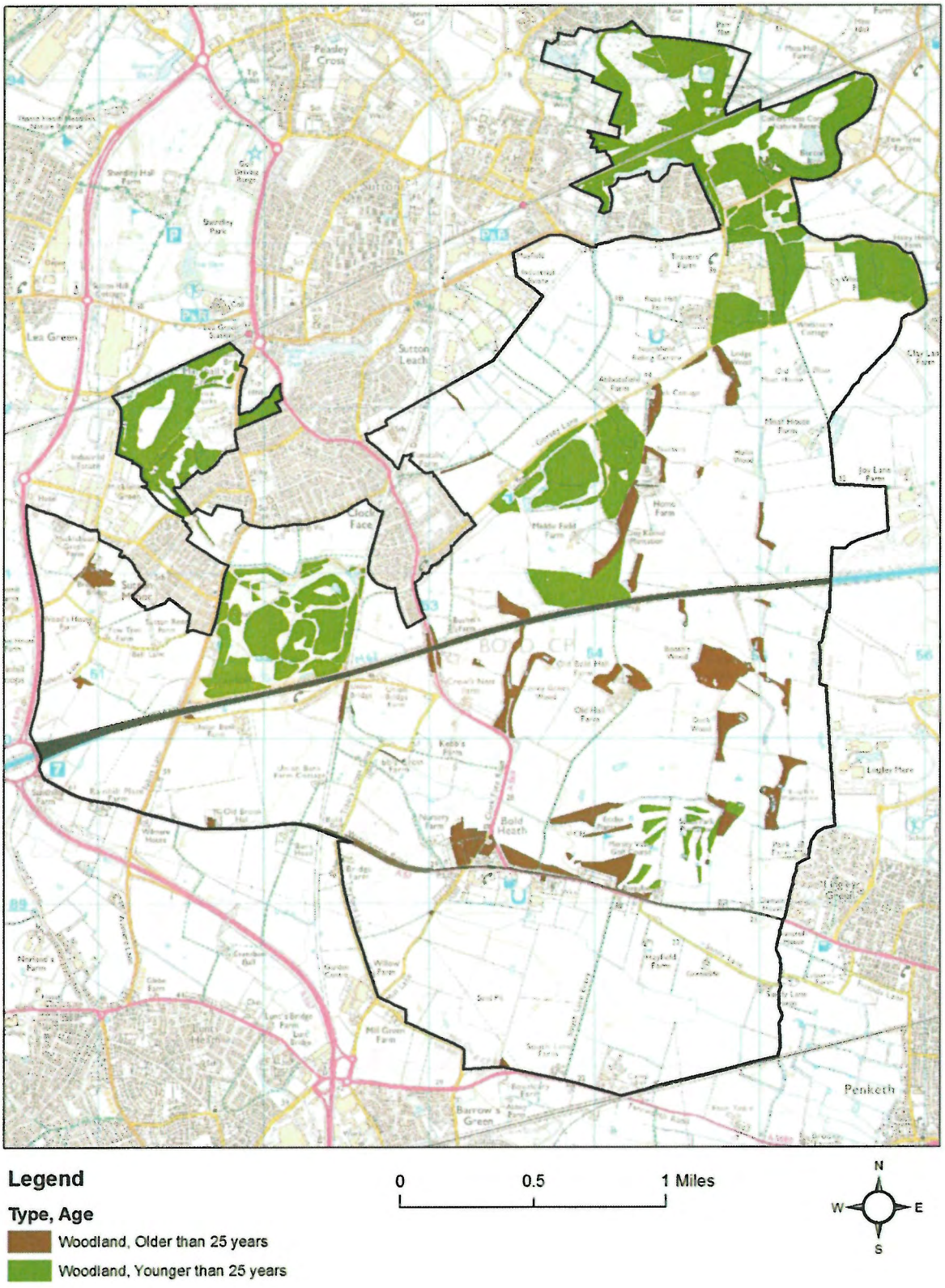
Development at site 4HA will have a significant negative impact within the Forest Park resulting in net loss of biodiversity within the boundary. Development would compromise and result in negative changes to priority habitats and loss of priority species including lapwing and therefore compromise the performance of the Area Action Plan.

Figure 1. Ponds, Brooks and soil stabilisation.[8]



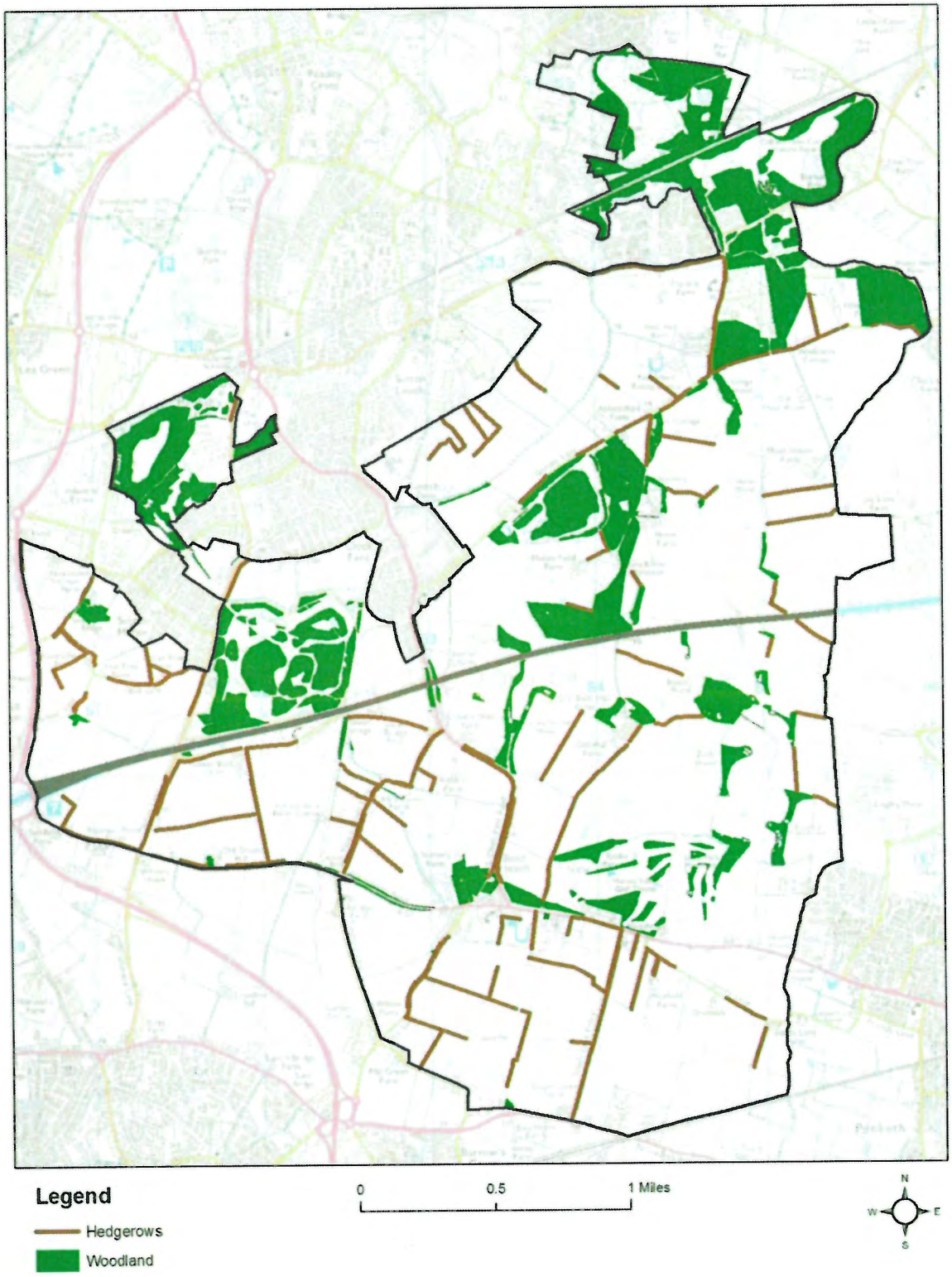
[8] Bold Forest Park Ecological Network Development, Page 22

Figure 2. Existing Woodlands.[9]



[9] Bold Forest Park Ecological Network Development, Page 13

Figure 2. Hedgerows.[10]



[10] Bold Forest Park Ecological Network Development, Page 14

Appendix F

Version 1 (May 2019)

A report on the findings of a Partial Phase 1 habitat survey and three bat transects

for

LAND PARCEL GBP_74/HA4:

In the Green Belt Review 2018 and
The St Helens Local Plan 2020-2035 respectively

May 2019

Version history:
V1 Submitted May 2019

Author: Glenys McBain, BSc (Hons)

1 Executive summary

Many local residents are concerned that the council has decided to remove several parcels of land from the Green Belt, with the consequential loss of habitats and priority species, and of their own open space for wellbeing and recreational purposes.

In addition, the allocation of the land parcel covered in this report to housing with immediate effect has caused greater concern in a wider sense as to its appropriateness (and at such levels) in the locality.

When records were sought to identify land use and species present, it was discovered that many records are quite old. It was felt that up to date information was required to ensure accuracy of reporting.

Whilst this was a limited phase 1 survey, its findings show that:

- The green space is highly valued and well used by the local populace for its open space and landscape, its recreational and health use. It is a conduit between "villages" and other recreational spaces, and for walking, getting close to nature, dog walking and horse riding in their own right.
- Arable farming forms a significant portion of the 164 hectares or so of the land parcel (approximately 55%). Approximately 30% is permanent grassland (grazing land in the equestrian businesses, neutral grassland in the LWS, and some haylage), with the remainder as other habitats (woodland, hedge, ditches, ponds).
- The mosaic habitats of HA4 provide a significant green connection between Local Wildlife Sites (LWS), Local Nature Reserves (LNR) and other "green" areas, thus is of significant value to wildlife.
- HA4 is a commuting and foraging area for bats and raptors. Common Pipistrelle (*Pipistrellus pipistrellus*); Soprano Pipistrelle (*Pipistrellus pygmaeus*); Noctule (*Nyctalus noctula*); Buzzard (*Buteo buteo*) and Kestrel (*Falco tinnunculus*) were observed, although not in significant numbers. This could have been due to the exceptionally cold conditions on the survey dates. A hunting owl was also heard, but could not be definitively identified.
- Key Priority Species of Farmland birds are present and breeding in significant numbers over the whole site, Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*) and Snipe(*Gallinago gallinago*) in particular.
- The Regionally important species (North West Biodiversity Audit) English Comfrey (*Symphytum officiale*) is present scattered across the land parcel.
- The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds surrounded by mature deciduous trees. All the ditches observed had some standing water present.
- On a negative note, the western edge of GBP_074/HA4 is bounded by a disused railway line which is dominated by significant stands of Japanese Knotweed *(Fallopia japonica)* – many of which touch the boundary itself.
- Some fly tipping was observed to the north of the LWS and the boundary of Reginald Road/the industrial estate.

In summary then, this land parcel plays a significant role in the biodiversity of the area, the openness of the landscape and the health of its local population. Its loss would be significant.

2 Introduction to the surveys

In the eight week period between 31/03/2019 and 13/05/2019, a partial phase 1 habitat survey was undertaken on the land parcel known as HA4 in the St Helen's Local Plan 2020-2035 and GBP_74 in the Green Belt Review 2018.

The purpose of the report was to record the current land use and species found in the land parcel as the council is proposing to remove this whole parcel from the Green Belt. Many existing records for this area are quite old, and it is felt that an up to date record is useful and necessary, especially as it pertains to the Bold Forest Park AAP (approved July 2017).

There is much concern within the local population that the character of the landscape will change to the detriment of their outlook, their mental health and their access to open space. In addition, many are concerned about the loss of wildlife and the effects on the environment that would result from the land use being changed to housing.

3 Methodology

3.1 Habitat surveys

Surveys were undertaken on the 30/03/2019, 08/04/2019, 20/04/2019, 07/05/2019 and 09/05/2019: to observe and record habitats and species from public rights of way (accessed from different locations).

Observations were collated, a list of species found created, a map created to show the habitats/land use within the land parcel and key biodiversity findings and observations noted.

Records will be submitted to the Merseyside Bio Bank project.

In addition, the surveys are to observe the existing public rights of way and their current use; negative impacts of invasive species and evidence of fly tipping.

3.2 Bat transect surveys

Three transect surveys were undertaken on the 30/03/2019, 21/04/2019 and 06/05/2019.

Data was collected and recorded using a variety of devices. The surveys were completed in line with the Bat Conservation Trust Good Practice Guidelines (Collins 2016).

Records will be submitted to the Merseyside Bio Bank project.

3.3 Limitations

Due to lack of time and access, the surveys were conducted by trained volunteers from public access footpaths that run through and across the land parcel, as well as observations from the surrounding roads and the disused railway line. Hence only partial data, though extensive, was able to be collected.

Due to lack of access, the citation and map for LWS_108 from 2016 (Merseyside Environmental Advisory Service) have been attached as complementary evidence to that collected during the surveys. *Where observation was not possible, their classification has been used to complete the habitat map.*

The site shows several habitat features that make it suitable for a range of mammals, reptiles and amphibians, including Water Vole (*Arvicola amphibius*) and Great Crested Newt (*Triturus cristatus*) that have previously been recorded here. This survey did not cover those aspects.

4 Findings

4.1 Main habitat classifications and findings;

The table in Appendix 1 shows the list of species found during the surveys. The maps in Appendix 3 show: the main findings for the habitat types observed during the surveys and a connectivity plan showing ecological pathways.

The field behind Gorsey Lane and Crawford Street (south west) shows overgrazing and poaching of the (semi-improved) grassland with 9 horses present at the time of survey. There is no evidence of the field being skipped out. This being noted, the tussocks of grass and vegetation appear to support breeding Lapwing (*Vanellus vanellus*) and Skylark (*Alauda arvensis*).

Not all the fields of Tunstalls Farm (a livery stable business to the north west) were easy to see, but they all appear to be permanent (semi-improved) grassland grazed by horses. They show good management with no overgrazing evident and fields being used in rotation. The rest of this land is neutral and marshy grassland that makes up LWS_108. The LWS is covered separately in 4.4.

The section of old parish boundary between the land parcels above has mature trees (mainly Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*), with some Hawthorn (*Crataegus monogyna),* Wild Cherry (*Prunus avium*), Sycamore (*Acer pseudoplatanus*), Hazel (*Corylus avellana*) and Elder (*Sambuscus nigra*). There are two sections of fenced land in the area where the footpath exits the land parcel to the west. One has a marshy character, the other more ruderal.

All of the arable fields (cereal crops this year) appear to have a 3 – 5m arable margin of grassland. High numbers of farmland bird species (see 4.2) were present in these fields, especially Skylark (*Alauda arvensis).*

As expected, the highest floral diversity was present in the field margins, ditches and woodland habitats. There are many scattered ponds over the site, the majority of which are surrounded by mature trees. All ditches had some standing water, with more ditches present than anticipated following the desk study. The intact hedgerows present on site appear to support a wide range of smaller bird species despite being species poor with Hawthorn (*Crataegus monogyna*) dominant.

Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*) continue to dominate the woodlands, although Alder (*Alnus glutinosa)* is frequent in the wet woodland at the north of the LWS.

One Regionally Important Plant Species that was found scattered across the whole land parcel was English or Common Comfrey (*Symphytum officinale*).

4.2 Key data for Farmland birds

The table in Appendix 1 shows the findings for the bird species observed during the surveys. Several breeding pairs of key farmland birds were observed, the following being of particular import:

Taxon name	Common Name	Notes
Alauda arvensis	Skylark	significant numbers including breeding pairs especially on the arable fields.
Emberiza citrinella	Yellowhammer	several pairs (at least six)
Emberiza schoeniclus	Reed Bunting	(pair)
Fringilla coelebs	Chaffinch	
Gallinago gallinago	Snipe	at least 12 - including breeding pairs
Perdix perdix	Grey Partridge	(pair)
Vanellus vanellus	Lapwing	significant numbers including breeding pairs especially on the grassland.

4.3 Key data for Bats

The following table and survey maps in Appendix 2 show the dates and locations for the bat species recorded during the transect surveys.

Taxon name	Common Name	Notes
Pipistrellus pipistrellus),	Common Pipistrelle	Most frequent species recorded
Pipistrellus pygmaeus	Soprano Pipistrelle	Occasional occurences
Nyctalus noctula	Noctule	Single occurrence

The first transect was abandoned within 30 minutes as the temperature dropped to 2°C and would not have given valid data. Even so, the sightings were of the same species and in the same locations as in the first part of the subsequent transects – and transect three as a whole.

The bats showed in smaller numbers than expected but this could have been due to the unusually cold evenings this spring.

4.4 Local Wildlife Site (LWS_108)

Observations were made from the footpaths at the south and east, thus significant areas could not be observed even with binoculars due to the trees and hedges in the interior.

The citation and map from 2016 (Merseyside Environmental Advisory Services through Merseyside Bio-Bank Services) are included as Appendix 5 to help remedy this.

There was no management plan with the citation but it was noted that the species rich eastern field was showing significant succession growth (by Goat Willow (*Salix caprea)* in particular) and this will need to be controlled to keep the site's main BAP habitats as neutral grassland/marshy grassland.

The minimal horse grazing on other parts of the site appears to be working well.

4.5 Other important observations

All of the public footpaths through and across the land parcel show evidence of high usage by pedestrians - dog walkers in particular.

The central north/south footpath/bridleway was mown on the final visit, presumably to improve access and this is helpful.

The whole site has a pleasing open aspect with views across to Winter Hill.

The disused railway line that borders the site on the north-west is dominated by large stands of Japanese Knotweed (*Fallopia japonica*), in places touching the boundary. This is a significant problem as the pathway is well used and it could spread rapidly.

There is evidence of fly tipping on the north edge of the LWS. This is not extensive, but unsightly. Measures have been taken to reduce this with signs saying "NO TIPPING" and "24 hour CCTV in place". Otherwise tipping and litter are minimal.

5 Appendices

5.1 Appendix 1

Species List in table format.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Taxon name	Common Name	*Taxon name*	Common Name
Acer campestre	Field Maple	*Glyceria fluitans*	Floating Sweet Grass
Acer pseudoplatanus	Sycamore	*Hedera helix*	Ivy
Aegopodium podagraria	Ground Elder	*Heracleum sphondylium*	Hogweed
Aesculus hippocastanum	Horse Chestnut (seedling)	*Holcus lanatus*	Yorkshire Fog
Agrostis stolonifera	Creeping Bent	*Holcus mollis*	Creeping Soft Grass
Ajuga reptans	Bugle	*Hyacinthoides x massartiana*	Bluebells (hybrid)
Alisma plantago-aquatica	Alder	*Ilex aquifolium*	Holly
Alisma plantago-aquatica	Water Plantain	*Iris pseudacorus*	Yellow (Flag) Iris
Alliaria petiolata	Garlic Mustard	*Juncus conglomeratus*	Compact Rush
Allium ursinum	Wild Garlic (Ramsons)	*Juncus effusus*	Soft Rush
Alnus glutinosa	Alder	*Juncus inflexus*	Hard Rush
Alopecurus pratensis	Meadow Foxtail	*Lamium album*	White Dead-nettle
Angelica sylvestris	Angelica	*Lamium purpureum*	Red Dead-nettle
Anisantha sterilis	Barren Brome	*Lathyrus pratensis*	Meadow Vetchling
Anthoxanthum odoratum	Sweet Vernal Grass	*Leucanthemum vulgare*	Oxeye Daisy
Anthriscus sylvestris	Cow Parsley	*Lolium perenne*	Rye Grass
Apium nodiflorum	Fool's-water-cress	*Lonicera periclymenum*	Honeysuckle
Arrhenatherum elatius	False Oat Grass	*Lotus corniculatus*	Birds Foot Trefoil
Artemisia vulgaris	Mugwort	*Lupinus sps*	Lupin (garden escape)
Bellis perennis	Daisy	*Lythrum salicaria?*	Purple Loosestrife?
Betula pendula	Silver Birch	*Malus sylvestris*	Crab Apple
Brassica napus	Oil-seed Rape	*Matricaria discoidea*	Pineapple weed
Calystegia silvatica	Large Bindweed	*Mentha aquatica*	Water Mint
Cardamine flexuosa	Hairy Bittercress	*Myosotis scorpiodes*	Water Forget-me-not
Cardamine pratense	Cuckoo flower	*Narcissus sps*	Daffodil (garden escape)
carex canescens?	White Sedge?	*Oenanthe crocata*	Hemlock Water Dropwort
Carex pendula	Pendulous Sedge	*Pentaglottis sempervirens*	Green Alkanet
Centaurea nigra	Knapweed	*Phalaris arundinacea*	Reed Canary Grass
Cerastium fontanum	Common Mouse-ear	*Plantago lanceolata*	Ribwort Plantain
Chamerion angustifolium	Rosebay Willowherb	*Plantago major*	Greater Plantain
Cirsium arvense	Creeping Thistle	*Poa annua*	Annual Meadow Grass
Cirsium palustre	Marsh Thistle	*Poa trivialis*	Rough Meadow Grass
Cirsium vulgare	Spear Thistle	*Potentilla anserina*	Silverweed
Cornus sanguinea	Dogwood	*Potentilla reptans*	Creeping Cinquefoil
Corylus avellana	Hazel	*Prunus avium*	Wild Cherry
Crataegus monogyna	Hawthorn	*Prunus spinosa*	Blackthorn
Dactylis glomorata	Cocksfoot	*Pteridium aquilinum*	Bracken
Deschampsia cespitosa	Tufted Hair Grass	*Quercus robur*	Oak
Deschampsia flexuosa	Wavy Hairgrass	*Ranunculus acris*	Meadow Buttercup
Digitalis purpurea	Foxglove	*Ranunculus repens*	Creeping Buttercup
Dipsacus fullonum	Teasel	*Rosa arvensis*	Field Rose
Dryopteris dilatata	Broad Buckler Fern	*Rosa canina*	Dog Rose
Dryopteris filix-mas	Male Fern	*Rosa Rugosa*	Hedge Rose (garden escape)
Elytrigia repens	Common Couch	*Rubus sps*	Bramble
Epilobium hirsutum	Greater Willowherb	*Rumex acetosa*	Common Sorrel
Epilobium montanum	Broad Leaved Willowherb	*Rumex crispus*	Curled Dock
Equisetum arvense	Field Horsetail	*Rumex obtusifolius*	Broad-Leaved Dock
Equisetum fluviatile	Water Horsetail	*Rumex sanguineus*	Wood Dock
Euonymus europaea	Spindle Tree	*Salix caprea*	Goat Willow
Festuca rubra	Red Fescue	*Salix fragilis*	Crack Willow
Ficaria verna	Celandine	*Sambuscus nigra*	Elder
Filipendula ulmaria	Meadowsweet	*Scrophularia auriculata*	Water Figwort
Fraxinus excelsior	Ash	*Senecio jacobaea*	Common Ragwort
Fumaria officinalis	Common Fumitory	*Senecio vulgaris*	Groundsel
Galium aparine	Cleavers	*Silene dioica*	Red Campion
Geranium pyrenaicum	Hedgerow Cranes-bill (garden escape?)	*Sisymbrium officinale*	Hedge Mustard
Geranium robertianum	Herb Robert	*Solidago canadensis*	Goldenrod (garden escape)
Geum urbanum	Wood Avens	*Sonchus asper*	Prickly Sow Thistle

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Taxon name	Common Name	*Taxon name*	Common Name
Sorbus aucuparia	Rowan	*Tussilago farfara*	Coltsfoot
Stellaria holostea	Greater Stitchwort	*Typha latifolia*	Reed Mace
Stellaria media	Chickweed	*Urtica dioica*	Common Nettle
Symphytum officinale	Common Comfrey	*Veronica polita*	Grey Field Speedwell
Symphytum x uplandicum	Russion Comfrey	*Viburnum opulus*	Guelder Rose
Taraxacum officinale	Dandelion	*Vicia cracca*	Tufted Vetch
Trifolium dubium	Lesser Trefoil	*Vicia hirsuta*	Hairy Tare
Trifolium pratense	Red Clover	*Vicia sativa*	Common Vetch
Trifolium repens	White Clover	*Vicia sepium*	Bush Vetch
Tripleurospermum inodorum	Scentless Mayweed		

Taxon name	Common Name	Notes
Aegithalos caudatus	Long-tailed tit	
Alauda arvensis	Skylark	significant numbers including breeding pairs
Anas platyrhynchos	Mallard	(pair)
Buteo buteo	Buzzard	
Carduelis carduelis	Goldfinch	flock of 8
Columba palumbus	Wood Pigeon	several
Corvus corone	Carrion Crow	
Cyanistes caeruleus	Blue tit	
Emberiza citrinella	Yellowhammer	several pairs (at least six)
Emberiza schoeniclus	Reed Bunting	(pair)
Erithacus rubecula	Robin	
Falco tinnunculus	Kestrel	
Fringilla coelebs	Chaffinch	
Gallinago gallinago	Snipe	at least 12 - including breeding pairs
Hirundo rustica	Swallow	
Parus major	Great tit	
Passer domesticus	House Sparrow	several -including breeding pairs
Perdix perdix	Grey Partridge	(pair)
Periparus ater	Coal tit	
Phasianus colchicus	Pheasant	
Phylloscopus collybita	ChiffChaff	(several)
Pica pica	Magpie	
Sturnus vulgaris	Starling	
Sylvia communis	Whitethroat	
Troglodytes troglodytes	Wren	
Turdus merula	Blackbird	several
Turdus viscivorus	Mistle Thrush	
Vanellus vanellus	Lapwing	significant numbers including breeding pairs

Taxon name	Common Name	Notes
Aglais io	Peacock Butterfly	
Anthocharis cardamines	Orange Tip Butterfly	
Bombus lapidarius	Red-tailed Bumble	
Bombus lucorum	White tailed Bumble Bee	
Coccinella magnifica	Ladybird	
Pararge aegeria	Speckled Wood Butterfly	
Pieris rapae	Small White Butterfly	

Taxon name	Common Name	Notes
Nyctalus noctula	Noctule	Single occurrence
Pipistrellus pipistrellus	Common Pipistrelle	Most frequent species recorded
Pipistrellus pygmaeus	Soprano Pipistrelle	Occasional occurences

Taxon name	Common Name	Notes
Oryctolagus cuniculus	Rabbit	

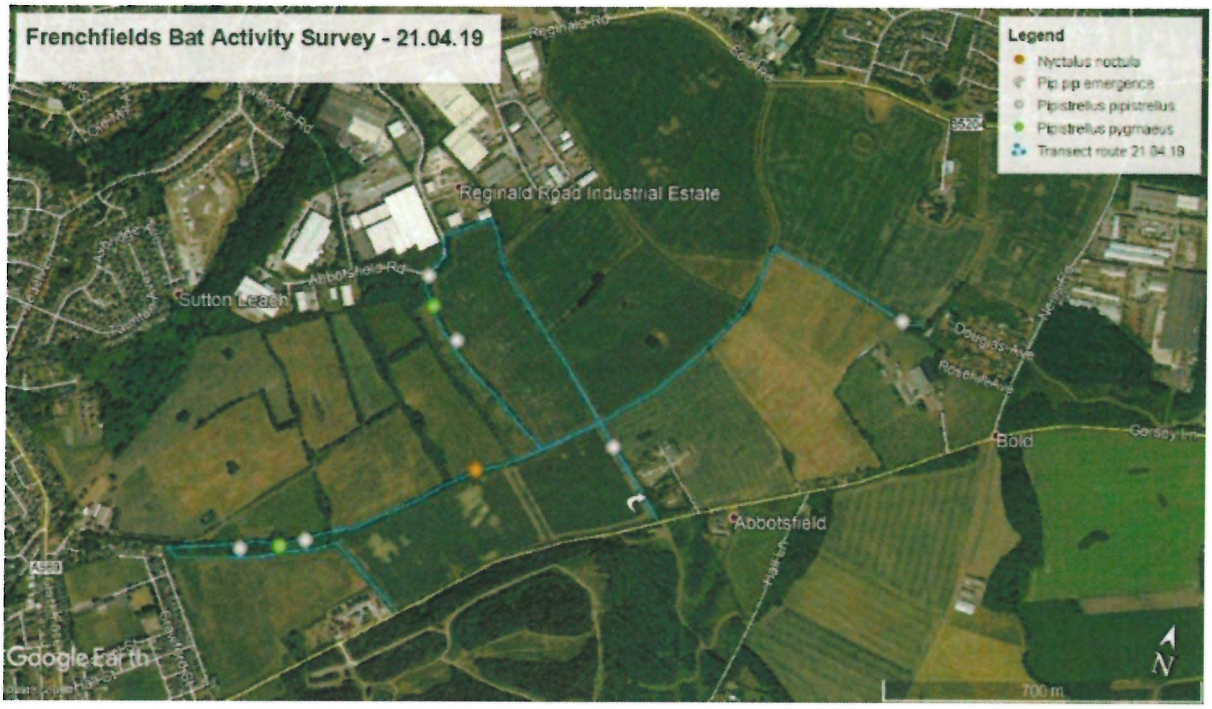
5.2 Appendix 2

Map of GBP_74/HA4 showing transect route and bats recorded

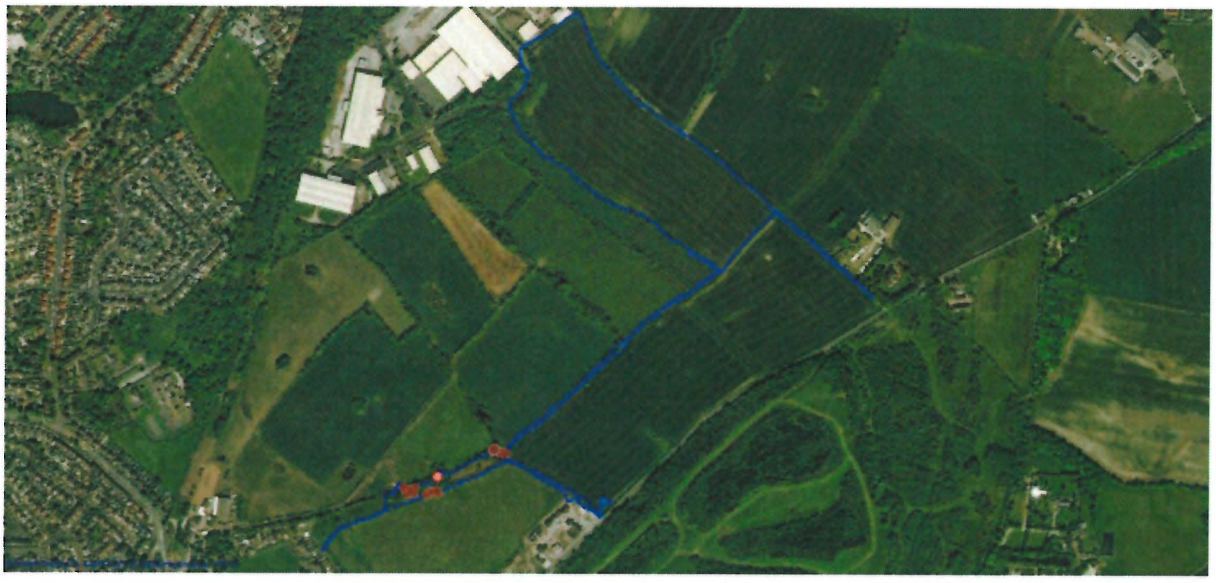
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Results of the two successful bat transects:



Mapping of the results from the bat transect number 2 on 21/04/2019



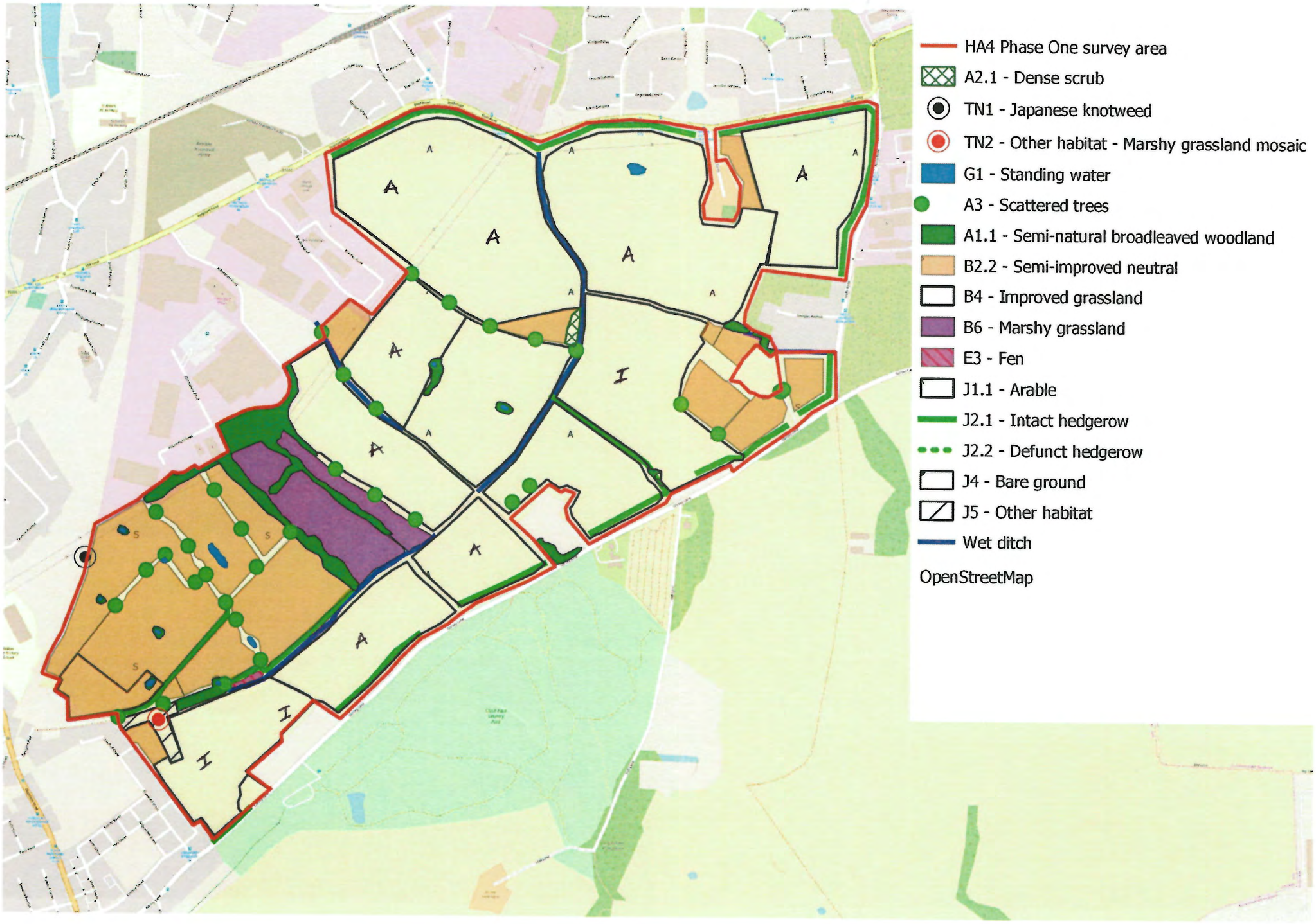
Mapping of the results from the bat transect 06/05/2019
showing Common Pipistrelle (Pipistrellus pipistrellus) in red and Soprano Pipistrelle(Pipistrellus pygmaeus) in orange

Note: The results of the last transect (06/05/2019) are very similar to the findings during the abandoned transect (30/03/2019) where the results were not recorded.

In both cases the temperature was very low (2°C in the abandoned; down to 7°C in the last).

5.3 Appendix 3

Phase 1 Habitat Map of GBP_74/HA4
And
Connectivity Plan for GBP_74/HA4


HA4 Phase One survey area
A2.1 - Dense scrub
TN1 - Japanese knotweed
TN2 - Other habitat - Marshy grassland mosaic
G1 - Standing water
A3 - Scattered trees
A1.1 - Semi-natural broadleaved woodland
B2.2 - Semi-improved neutral
B4 - Improved grassland
B6 - Marshy grassland
E3 - Fen
J1.1 - Arable
J2.1 - Intact hedgerow
J2.2 - Defunct hedgerow
J4 - Bare ground
J5 - Other habitat
Wet ditch
OpenStreetMap

5.4 Appendix 4

Photos taken during Phase 1 survey of GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



View south across Tunstalls Farm from disused railway line



View north across Tunstalls Farm from old parish boundary



Looking towards Clock Face Country Park from old parish boundary



One of many ponds on site



Looking north across the LWS grassland



Eastern field of LWS

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Looking north from LWS across arable fields



Looking north east across arable fields from central footpath



Stands of Japanese Knotweed at the western boundary



Horses grazing at Tunstalls Farm



View north east over arable land



View north over arable fields

5.5 Appendix 5

The Citation for LWS_108 Tunstalls Farm (2016)
and
The Map for LWS_108 Tunstalls Farm (2016)

(supplied by Merseyside Environmental Advisory Service through Merseyside Bio-Bank Services)

***Site Name*:** **Tunstall's Farm (formerly Field north of Gorsey Lane)**

***Site Area*:** **15.05 hectares** ***National Grid Reference*:** **SJ534921**

***Date of Designation*:** **April 1994 (part)** ***District*:** **St. Helens**

***Date of Last Revision*:** **September 2016** ***Local Wildlife Site Number*:** **108**

CITATION: A group of small agricultural fields with an extensive ditch and hedgerow network. The field is now under Environmental Stewardship and is developing into a species rich meadow including, regionally and locally important species. The ponds and ditches on site provide habitat for water vole and great crested newts.

APPRAISAL: This site has been evaluated against the guidelines approved by the Council for selection of Local Wildlife Sites. The site's evaluation against the guidelines is set out below.

Guideline		Comment
HABITATS		
H1; H2; H3; H4.	Rarity Diversity Nearness Isolation	1 priority BAP habitat; 3 regionally important habitats. 11 habitats recorded. 31 sites within 1Km. --
PLANTS		
SP1; SP2; SP3; SP4.	Rarity Diversity Naturalness Nationally Rare	1 regionally important species; 1 locally rare species. Total of 74 plant species. 95.95% of the plants are native to the borough. Colonisation has been aided by man and the site has been physically altered. --
ANIMALS		
General SP5; Birds B1; B2; B3; B4; B5. Dragonflies Od1. Od2. Butterflies Bf1; Bf2. Amphibians A1; A2. Reptiles R1; R2; Bats Bat1; Bat2. Mammals Mam1.	 Rare/priority Non-breeding population Breeding population Regional rare/scare Breeding assemblage Assemblage, breeding, wintering, passage. Breeding Regional rare/scarce Region rare breeding Breeding assemblage Rarity Exceptional populations Population of native species. Exceptional population Roost Assemblage Breeding	 -- -- -- -- -- -- -- -- -- -- Guideline met – Great crested newt -- -- -- -- -- Guideline met – Water vole.

SUMMARY: The combination of these factors has led to this site being identified as a Local Wildlife Site.

NOTE: Validated data from 1981 to September 2016 have been used in this assessment. Other data may become available to support this designation.

Status of species of nature conservation importance

Habitats

1 Priority BAP habitat	Unimproved neutral grassland
3 Regionally important habitats (North West Biodiversity Audit)	Unimproved neutral grassland Marshy grassland Standing water

Plants

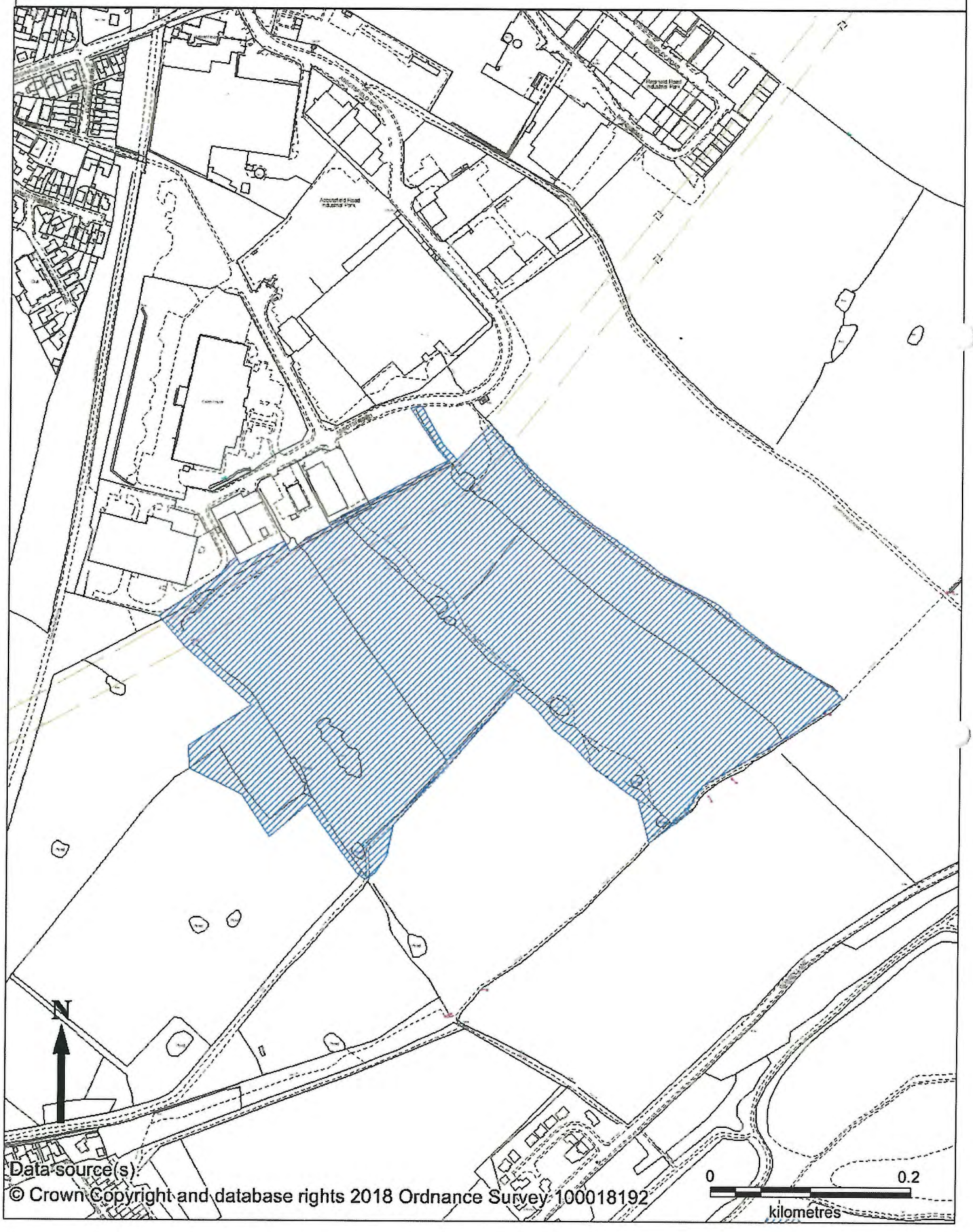
1 Regionally important species (North West Biodiversity Audit)	Common comfrey (*Symphytum officinale*)
1 Locally rare species	Fen Bedstraw (*Galium uliginosum*)

Animals

Amphibians **1 Habitats Regulations 2010 – Schedule 2 species** **1 Wildlife and Countryside Act – Schedule 5 species**	Great crested newt (*Triturus cristatus*)
Mammals **1 Wildlife and Countryside Act – Schedule 5 species**	Water vole (*Arvicola terrestris*)

Local Wildlife Site 108
Tunstalls Farm
Scale: 1:2500

Merseyside Environmental Advisory Service



Data source(s)

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PO3608

PF1347

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

1420

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: 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:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☑ (Via Email)	No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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	LPC06	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 ☐	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

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 policy to target as our representation, but we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4PGBP_074 and its allocation for housing as we believe the councils position is flawed. All the arguments we wish to put forward are within the attached documents. Which is - Assessment of the St Helens local Plan and green belt review and phase one 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:

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 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.

PO3609

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).

1421

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

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPC06	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 ☐	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

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 we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4PGBP_074 and 155 allocation for housing as we believe the councils position is flawed. All the arguments we wish to put forward are within the attached document. Which is - Assessment of the St Helens local Plan and green belt review and phase one 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:

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.

PF1345.pdf

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.

PO3610

①-LPA05 ②-LPC06

Representor Details

Web Reference Number	WF0096
Type of Submission	Web submission
Full Name	Mr A. Miller
Organisation	C/O Acland Bracewell Surveyors Limited
Address	The Barrons Church Road Tarleton Preston PR4 6UP
Agent Details	Mr Robert Rawlinson Acland Bracewell Surveyors Limited The Barrons Church Road Tarleton Preston , PR4 6UP

Would you like to be kept updated of future stages of the St Helens Borough 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	LPC06
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.
This firm has been instructed to submit representations for and on behalf of the freehold owner of the site (Ref LWS53), known as Islands Brow Burgy, West of Hinckley Road, Blackbrook ('the Site').
Executive Summary

1. The Site is currently allocated for residential development, for up to 320 dwellings, under Policy RES 1 of the St. Helens UDP (Adopted 1998), as saved under the St. Helens Core Strategy (Adopted 2012).
2. On this basis, Policy RES 1 is still a material planning consideration and should be given substantial weight, in the context of planning decisions.

01

3. The site is in an eminently sustainable location for development, to assist the Council in delivering their housing supply for the emerging local plan period. 01
4. The landowner is committed to delivering residential housing on this site, for up to 320 units.

5. The emerging Local Plan seeks to remove the site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.
6. The landowner does not support the Council's proposal to remove site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06. 02
7. The emerging Local Plan is therefore contrary to the Adopted Core Strategy (2012) and NPPF 2019.

8. The emerging Local Plan is no sound, nor legally compliant.

Recommendations

1. Retain the Site's (2H1 / LWS53) existing Residential Housing Allocation for 320 units in the emerging Local Plan
2. Remove the Site's proposed allocation as Local Wildlife Site

Site Context

The Site extends to 22.90ha. and is located to west of Hinckley Road, north east of Islands Brow and is contained by development on all four sides of the site's boundaries.

The site is in an eminently sustainable location for development, to assist the Council in delivering their housing supply for the emerging local plan period.

The Site is currently allocated for residential development, for up to 320 dwellings, under Policy RES 1 of the St. Helens UDP (Adopted 1998), as saved under the St. Helens Core Strategy (Adopted 2012).

The Site has been subject to previous planning applications for residential development, notably application ref. P/2003/0472 for erection of 432 houses and flats with roads, landscape and infrastructure.

Planning Context

The site was allocated in the St Helens Unitary Development Plan Adopted 2nd July 1998 (' St. Helens UDP') for residential allocation (Ref: 2H1) with an estimated capacity of 320 units.

Policy RES 1, of the St. Helens UDP states that:

In accordance with Part 1 Policy S6, the following sites are either allocated for residential development or have the benefit of planning permission.

"44ha of land is available for residential development in Haydock and Blackbrook (Policy RES 1 Residential Land Allocation). A significant proportion of this land is concentrated in two large sites:

		Area	Site Capacity (Actual or Estimated)
(i)	Islands Brow Burgy, west of Hinckley Road, Blackbrook (2H1)	22.90ha	320 units
(ii)	The former Princess Pit, east of Haydock Lane, Haydock (2H3)"		

Following a Direction from the Secretary of State for Communities and Local Government under Paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004, the majority of policies in the UDP were saved, of which Policy RES 1 Residential Land Allocation was saved.

On 31st October 2012, the St. Helens Core Strategy was adopted. Several Core Strategic Policies replace the saved UDP policies. However, Policy RES 1 was saved in the Adopted Core Strategy and it is these saved policies together with the Core Strategy and the Joint Waste Local Plan form the Development Plan for the Borough.

On this basis, Policy RES 1 is still a material planning consideration and should be given substantial weight, in the context of planning decisions.

Emerging Local Plan

The Council are currently working on the production of an emerging Local Plan, for the period up to 2035.

The Local Plan includes the Borough's vision and objectives for development, its strategic policies guiding the amount, form and location for new development, site allocations for new housing, employment and other forms of development and local policies with additional requirements to guide the consideration of planning application for new development and details of where these will apply.

The intention of the emerging Local Plan is to replace all the policies in the St. Helens Core Strategy 2012 and the previously 'saved' policies of the St. Helens Unitary Development Plan 1998. Should the Local Plan be adopted, not part of that Core Strategy or the UDP documents will remain extant.

Critically, the context of my client's land ownership, the emerging Local Plan seeks to remove the site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.

My client, as landowner does not support this draft allocation of the site as a Local Wildlife Site.

Importantly, this draft allocation is explicitly contrary to the St. Helens Core Strategy (2012).

The draft Local is therefore not sound, nor legally compliant.

Local Wildlife Site

It is argued that the site does not provide substantive nature consideration value, nor does the site meet the criteria required for a Local Planning Authority to allocate the site, given it is not considered to be important, nor distinctive site. In addition, it is argued the site does not contain threatened habitats and species that have a national, regional and importantly local context.

The criteria for allocating land as Local Wildlife Sites refer to habitats such as 'ancient woodlands, heaths, wetlands and grasslands'. It states, 'they play a critical role in the conservation of the UK's natural heritage by providing essential wildlife refuges in their own right'.

The site is not an ancient woodland, heath, wetland or grassland.

It is argued it does not play a critical role in the conservation of the UK's natural heritage and whilst any land may play some degree of wildlife habitat, it does not provide an essential wildlife refuge in its own right.

This is a very high bar in terms of threshold to meet, and by implication the fact that the guidance refers to ancient woodlands, heaths, wetlands and grasslands guides Local Planning Authorities towards the type of habitat that should be allocated as a Local Wildlife Site.

Critically, the site was allocated in 1998 under the St. Helens UDP, for residential development; this is 21 years ago.

As recently as 2012, being only 7 years ago, the Local Planning Authority submitted to the Secretary of State, at the examination in public of their Core Strategy, that this site (2H1) is still capable of delivering 320 houses towards the Borough's housing needs. This was supported and endorsed by the Planning Inspector at that time, and the Core Strategy was found to be legally sound and compliant and adopted in 2012.

Notwithstanding, the Site's ability to deliver housing, the National Planning Policy Framework (2019) states that Council's should only allocate lands that have international, national and locally designated sites of importance for biodiversity.

It is incompressible how in only 7 years, the Council can remove this site's residential allocation status and re-allocate the site as a Local Wildlife Area and advising how this site plays a critical role in the conservation of the UK's natural heritage; this is not consistent, nor reasonable.

It simply cannot be that in 7 years, this site has been transformed from a residential allocation to a locally designated site of importance for biodiversity.

The emerging Local Plan is therefore contrary to the NPPF 2019.

Summary

The Site is currently allocated for residential development, for up to 320 dwellings, under Policy RES 1 of the St. Helens UDP (Adopted 1998), as saved under the St. Helens Core Strategy (Adopted 2012).

On this basis, Policy RES 1 is still a material planning consideration and should be given substantial weight, in the context of planning decisions.

The site is in an eminently sustainable location for development, to assist the Council in delivering their housing supply for the emerging local plan period.
The landowner is committed to delivering residential housing on this site, for up to 320 units.
The emerging Local Plan seeks to remove the site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.
The landowner does not support the Council's proposal to remove site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.
As recently as 2012, being only 7 years ago, the Local Planning Authority submitted to the Secretary of State, at the examination in public of their Core Strategy, that this site (2H1) is still capable of delivering 320 houses towards the Borough's housing needs. This was supported and endorsed by the Planning Inspector at that time, and the Core Strategy was found to be legally sound and compliant and adopted in 2012.
It is incompressible how in only 7 years, the Council can remove this site's residential allocation status and re-allocate the site as a Local Wildlife Area and advising how this site plays a critical role in the conservation of the UK's natural heritage; this is not consistent, nor reasonable.
It simply cannot be that in 7 years, this site has been transformed from a residential allocation to a locally designated site of importance for biodiversity.
The emerging Local Plan is therefore contrary to the Adopted Core Strategy (2012) and NPPF 2019.
The emerging Local Plan is no sound, nor legally compliant.
Recommendations
3. Retain the Site's (2H1 / LWS53) existing Residential Housing Allocation for 320 units in the emerging Local Plan
4. Remove the Site's proposed allocation as Local Wildlife Site under draft Policy LPC06

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

3. Retain the Site's (2H1 / LWS53) existing Residential Housing Allocation for 320 units in the emerging Local Plan
4. Remove the Site's proposed allocation as Local Wildlife Site under draft Policy LPC06

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:
The Site is currently allocated for residential development, for up to 320 dwellings, under Policy RES 1 of the St. Helens UDP (Adopted 1998), as saved under the St. Helens Core Strategy (Adopted 2012). On this basis, Policy RES 1 is still a material planning consideration and should be given substantial weight, in the context of planning decisions.
The site is in an eminently sustainable location for development, to assist the Council in delivering their housing supply for the emerging local plan period.
The landowner is committed to delivering residential housing on this site, for up to 320 units.
The emerging Local Plan seeks to remove the site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.
The landowner does not support the Council's proposal to remove site's Residential Land Allocation and re-allocate the land as a Local Wildlife Site, under draft Policy LPC06.
As recently as 2012, being only 7 years ago, the Local Planning Authority submitted to the Secretary of State, at the examination in public of their Core Strategy, that this site (2H1) is still capable of delivering 320 houses towards the Borough's housing needs. This was supported and endorsed by

the Planning Inspector at that time, and the Core Strategy was found to be legally sound and compliant and adopted in 2012.
It is incompressible how in only 7 years, the Council can remove this site's residential allocation status and re-allocate the site as a Local Wildlife Area and advising how this site plays a critical role in the conservation of the UK's natural heritage; this is not consistent, nor reasonable.
It simply cannot be that in 7 years, this site has been transformed from a residential allocation to a locally designated site of importance for biodiversity.
On behalf of the landowner there is significant prejudice to their estate, if the Plan is found sound in its current form.
Given the importance of the changes to this site's allocation status, the landowner should be afforded reasonable grounds to put forward their case to the Planning Inspector at the EiP.

Response Date	3/13/2019 12:07:21 PM

PO3611

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
(5) - LPC12 - para 7.44
(6) - LPD 01
(7) - LPC 14
(8) - SA - para 7.58
(9) - SA - APPENDIX 5

St Helens Local Plan Formal Consultation Response
Sayce, Stephen
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:37

[redacted]

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

[redacted]



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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Click here to report this email as spam

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 Postcode: [redacted]	Address: Postcode:
	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.

6F0069

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	LPC06	Paragraph / diagram / table	7.6.2	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	☐
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

Policy LPC06 Biodiversity and Geological Conservation sets out how sites, habitats and species within this hierarchy will be protected and managed with the objective of ensuring that there will be no net loss of the ecological resource. The policy will also guide how appropriate mitigation, replacement or other compensation measures should be identified. We would suggest a minor modification to ensure biodiversity net gain is clearly referenced in this section to promote biodiversity enhancement.

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.

LF0069

Minor modification to the text recommended seeking to strengthen the policy to encourage development proposals to provide biodiversity net gain rather than avoid impact or mitigate,

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.

PO3612

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

(1) - LPA01
(2) - LPA02
(3) - Green 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/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

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

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

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

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

Bold and Clock Face Village Action Group.

12 MAY 2019

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: 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 Postcode: WA9 4FZ	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	13.05.19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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 ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 LPC07: Greenways

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	**X**	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
The community of Bold feel like they have been excluded from the St Helens Local Plan process and have not had a voice. The community need an opportunity to have their voice heard and concerns raised. **The area of Bold has a unique offering within the Borough of the Bold Forest Park and the associated Action Plan, which has been largely ignored.**

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

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

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

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

Policy LPC07: Greenways

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPC07 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 2018-2021[1] as an adopted development plan document should play a key role in guiding decisions.

Policy LPC07 makes no specific reference to the Bold Forest Park Area Action Plan. The Group believe the Area Action Plan, as part of an adopted development plan, focusing on boosting the rural economy, primarily through tourism to the Forest Park, should be a key consideration and the Council have failed in their legal compliance by not considering this.

Policy LPC07 Section 2 states, 'Development proposals that would affect a Greenway will be refused if they would:

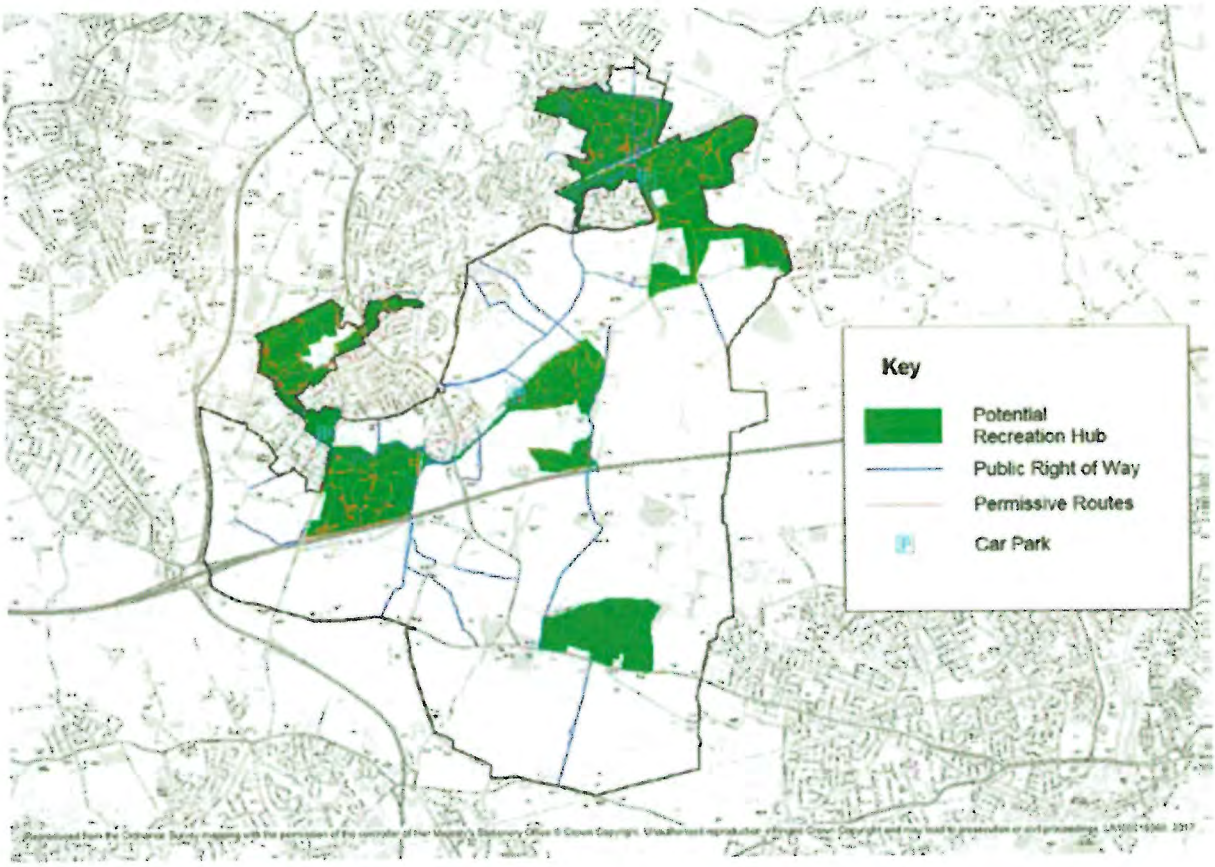
a) Prejudice the continuity of public access to the greenway;
b) Harm the integrity of the greenway in terms of off-road linkages, character or amenity.

Site 4HA and 5HA are criss-crossed by a number of Public Rights of Way. 4HA incorporates Bold Loop a Mersey Forest Trail, Bridleways and proposed Bridleways in the BFPAAP. Development of these sites would compromise the ability of people to access these routes. 'The landscape of Bold Forest Park is urban fringe farming coupled with raised spoil heaps, which have been reclaimed to woodland.'[2] The countryside feel and open aspect of the farm

[1] St Helens Council Local Development Scheme 2018-2021, Section 2.1
[2] Bold Forest Park Area Action Plan, Adopted 2017, Page 15

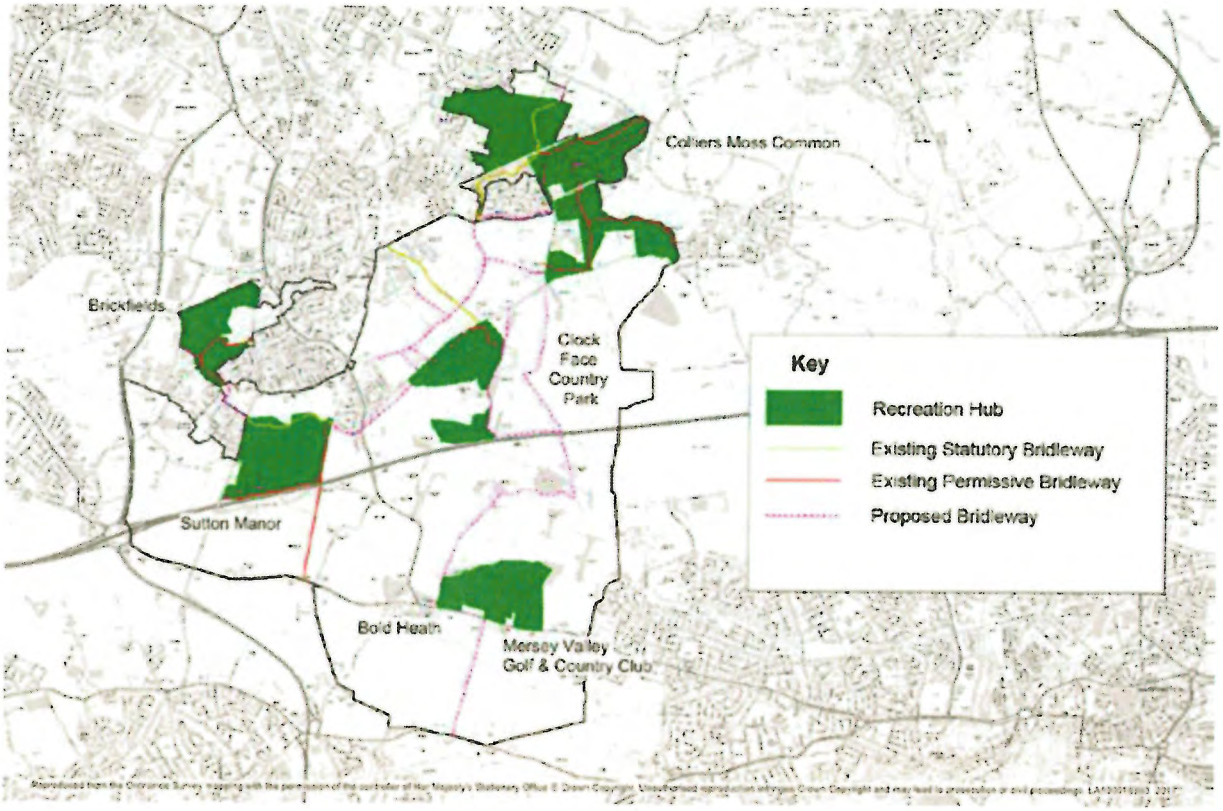
and grassland pasture are a huge draw to visitors to the Forest Park, particularly those looking for off-road bridleways and ramblers. The area is part of the Lancashire Coal Measures (NCA 59) of which Natural England's National Character Area Advice identifies mining and agriculture as a major influence. 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 Group believe development of 4HA and 5HA will fundamentally harm the integrity of the greenway in terms of off-road linkages, especially in relation to PRoW and the current and proposed bridleways. It will change the character of the area as discussed in the BFPAAP and Lancashire Coal Measures and damage the attractiveness of the area to residents and visitors.

Figure 3. Current Forest Park Infrastructure[3]



[3] Bold Forest Park Area Action Plan, Adopted 2017, Page 27

Figure 4. Existing and Proposed Bridleway Network[4]



[4] Bold Forest Park Area Action Plan, Adopted 2017, Page 42

PO3613

EL0056

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

[redacted]

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
[redacted]

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

EF0176

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: MR	Title: MR
First Name: 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:	
Email:	

Signature: [redacted] **Date:** 13/03/19

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

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

Yes ☑ (Via Email) No ☐

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

PART B – YOUR REPRESENTATION

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

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

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

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

[redacted]

BARTON WILLMORE

3.70 Notwithstanding the above, our Client questions why the Policy differentiates between Zone 2 and 3 at all especially when the policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the policy to be simplified.

3.71 Our Client considers that the Council should ensure that adequate monitoring takes place across the Borough to ensure that the need for affordable housing is met. Equally however, our Client considers a policy mechanism should be established so that should an over provision of affordable housing in the borough be demonstrated, a lower requirement would be sought on new greenfield developments.

Policy LPC07: Greenways

3.72 This Policy outlines that development proposals that would affect a designated Greenway will be refused if they prejudice the continuity of public access to the Greenway; harm the integrity of the Greenway in terms of off-road linkages, character or amenity; harm the appearance of the Greenway or impede the integrity of a Greenway with regard to its function as a wildlife network.

3.73 Figure 7.2 of the New Local Plan illustrates the existing Greenway Network as well as potential new routes through it. In this regard a New Route is indicated as running through our Clients land interest.

3.74 Neither the Policy or the supporting text provide any detail as to what these new routes are, their precise location or how they will be delivered/funded. This lack of information is a cause of concern for our Client and greater clarity is required as to what this New Route will entail, its impact on the housing allocation and how this Greenway will be delivered. Accordingly, our Client is unable to support this Policy presently.

Policy LPC09: Landscape Protection and Enhancement

3.75 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are of impotence to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development the Policy provides a mechanism for mitigation and/or compensation as appropriate.

- 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;

- 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.

- 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;

- 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;

- 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

- 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.

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

PO3614

Representation - Metacre Ltd
Jen Beardsall
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:04

[redacted]

1 Attachment

Final Representation St Helens LPSD - Metacre Ltd (March 2019).pdf

Dear Sir/Madam,

Please find attached a representation to the Submission Draft Local Plan, prepared on behalf of Metacre Ltd.

Kind regards

Jen

Jen Beardsall
BA(Hons) MCD MRTPI
Senior Planner

[redacted]

De Pol Associates Limited - Farington House, Stanifield Business Park, Stanifield Lane, Farington, Leyland, Preston, PR25 4UA

EF0012A

St.Helens Council

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

Ref: LPSD

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Jennifer
Last Name:	Last Name: Beardsall
Organisation/company: Metacre Ltd	Organisation/company: De Pol Associates
Address: Postcode:	Address: Farington House, Stanifield Lane, Leyland Postcode: PR25 4UA
Tel No:	[redacted]
Mobile No:	Mobile No:
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.

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

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

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

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Telephone: 01744 676190

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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	**LPC08**	Paragraph / diagram / table		Policies Map	**Local Wildlife Site designations**	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 ☐	No ☐
Sound?	Yes ☐	No X
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?	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

The Council's Policies Map is seeking to carry forward 2no. designated Local Wildlife Sites (ref. LWS 90 & LWS 91) in the LPSD, which are within private ownership. These sites were first designated in 2003 and since this time have not been subject to any management plan or monitoring. It is considered that these ecological designations are are now outdated and invalid. This is supported by ecology survey findings as appended to this representation which determine that the site has degraded and will continue to degrade further without investment. These findings have been presented to the Council as part of the Preferred Options consultation and reviewed by MEAS. MEAS consider that ecologically valuable habitats remain present on site and therefore the LWS

01

designations ought to remain. However, as the LWS's are not subject to any management plan or monitoring, it is considered that these habitats will simply degrade further. It is evident that such assets could not be improved without commitment from landowners, would require preservation and enhancement, long term management and in turn would incur significant costs.

Whilst the wording of Policy LPC08 suggests that the Council will seek to strengthen the existing ecological network, it is considered that the Policy and the Council's approach to the evidence presented by Metacre to date, does not recognise the opportunities that exist to genuinely enhance the subject LWS's.

02

In this regard, the wording of Policy LPC08 and the retention of outdated LWS designations in the emerging Policies map is unjustified, ineffective and inconsistent with national policy. It is also inconsistent with the Council's own Bold Forest Park AAP which acknowledges that most LWS's are in private ownership and therefore such assets could not be improved without private investment.

Further comments are set out in Section 3 of the attached 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.

Section 3 of the attached representation, and the appended ecological findings, demonstrate how designations LWS 90 & LWS 91 are no longer justified. These designations should therefore be removed from the Submission Draft Policies Map. Alternatively, the LWS boundaries should, at the very least, be reduced to the small areas of the site which continue to have ecologically valuable habitats present.

Policy LPC08 also ought to be reworded to acknowledge that development may be supported where it can result in the enhancement of biodiversity assets to achieve a net gain in biodiversity, particularly where previously valuable sites have degraded due to lack of monitoring and investment.

Further comments are set out in Section 3 of the attached representation.

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	**X**	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To discuss these matters in detail with the relevant statutory consultee, MEAS.

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.

PO3615

LPSD Representation (May 2019) Metacre Ltd - Response to MEAS
Jen Beardsall
to:
planningpolicy@sthelens.gov.uk
01/05/2019 10:00

[redacted]

1 Attachment

Final Representation St Helens LPSD - Metacre Ltd (May 2019).pdf

Dear Sir/Madam,

Please find a further representation attached, prepared on behalf of Metacre Ltd. The representation seeks to specifically respond to comments made by MEAS (of May 2018) in respect of Local Wildlife Designations 90 and 91 (as illustrated on the emerging Policies map).

Should you have any queries regarding the content of the attached document, please do not hesitate to contact me.

Kind regards

Jen

Jen Beardsall
BA(Hons) MCD MRTPI
Senior Planner

[redacted]

De Pol Associates Limited - Farington House, Stanifield Business Park, Stanifield Lane, Farington, Leyland, Preston, PR25 4UA

St.Helens Council

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

Ref: LPSD

(For official use only)

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Jennifer
Last Name:	Last Name: Beardsall
Organisation/company: Metacre Ltd	Organisation/company: De Pol Associates
Address: Lynton House, Ackhurst Business Park, Foxhole Road, Chorley Postcode: PR7 1NY	Address: Farington House, Stanifield Lane, Leyland Postcode: PR25 4UA
Tel No:	[redacted]
Mobile No:	
Email:	

Signature: [redacted] **Date:** 01/05/2019

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes **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 Monday 13th May 2019** by:

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

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

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

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
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NEXT STEPS

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

DATA PROTECTION

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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	**LPC08**	Paragraph / diagram / table		Policies Map	**Local Wildlife Site designations**	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 ☐	No ☐
Sound?	Yes ☐	No X
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?	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

As set out in previous representations to the LPSD in January 2019, the Council's Policies Map is seeking to carry forward 2no. designated Local Wildlife Sites (ref. LWS 90 & LWS 91) in the LPSD, which are within private ownership. These sites were first designated in 2003 and since this time have not been subject to any management plan or monitoring. It is considered that these ecological designations are now outdated and invalid.

This is supported by previously submitted ecology survey findings which determine that the site has degraded and will continue to degrade further without investment. These findings had been presented to the Council as part of the Preferred Options consultation and reviewed by MEAS. As set out in a letter dated 11 May 2018, MEAS consider that ecologically valuable habitats remain present on site and therefore the LWS designations ought to remain.

However, as the LWS's are not subject to any management plan or monitoring, it is considered that these habitats will simply degrade further. It is evident that such assets could not be improved without commitment from landowners, would require preservation and enhancement, long term management and in turn would incur significant costs.

Whilst the wording of Policy LPC08 suggests that the Council will seek to strengthen the existing ecological network, it is considered that the Policy and the Council's approach to the evidence presented by Metacre to date, does not recognise the opportunities that exist to genuinely enhance the subject LWS's.

In this regard, the wording of Policy LPC08 and the retention of outdated LWS designations in the emerging Policies map is unjustified, ineffective and inconsistent with national policy. It is also inconsistent with the Council's own Bold Forest Park AAP which acknowledges that most LWS's are in private ownership and therefore such assets could not be improved without private investment.

The attached letter, prepared by Rachel Hacking Ecology, on behalf of Metacre Ltd, provides a response to the comments made by MEAS (refer to Appendix 1 of attached letter).

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.

Previous representations made by Metacre Ltd and the attached letter, prepared by ecologist, Dr Rachel Hacking, demonstrates how designations LWS 90 & LWS 91 are no longer justified. These designations should therefore be removed from the Submission Draft Policies Map. Alternatively, the LWS boundaries should, at the very least, be reduced to the small areas of the site which continue to have ecologically valuable habitats present.

Policy LPC08 also ought to be reworded to acknowledge that development may be supported where it can result in the enhancement of biodiversity assets to achieve a net gain in biodiversity, particularly where previously valuable sites have degraded due to lack of monitoring and investment.

Further comments are set out in the attached letter.

Please continue on a separate sheet if necessary

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

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To discuss these matters in detail with the relevant statutory consultee, MEAS.

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.

RACHEL HACKING ECOLOGY

Bowden Hall, Bowden Lane, Marple, Stockport, Cheshire SK6 6ND

[redacted]

28th April 2019

FAO:

[redacted]
Merseyside Environmental Advisory Service
1st Floor Merton House
Stanley Road
Bootle
Merseyside
L20 3DL

LAND OFF FLEET LANE, ST. HELENS – LOCAL WILDLIFE SITE REVIEW

This letter responds to comments provided by [redacted] of Merseyside Environmental Advisory Service (MEAS from this point forwards) (Appendix 1), which have been made in response to detailed representations to the St Helens Local Plan Preferred Options and Green Belt Review Consultation, made on behalf of Metacre Ltd, in respect of land south of Fleet Lane, Parr. The subject site is designated as Green Belt in the emerging Local Plan. As set out in separate, detailed representations made by De Pol Associates on behalf of Metacre Ltd, the site is considered to be appropriate for Green Belt release and for the delivery of new housing.

A number of ecological surveys have been undertaken at the site by Rachel Hacking Ecology (RHE) in 2017 & 2018, including an Extended Phase 1 Habitat Survey, Botanical (NVC) survey, Great Crested Newt Survey and Reptile Survey. The site has also been assessed under the LWS designation criteria and the results of this are detailed in the Botanical Survey report.

The subject site includes two Local Wildlife Sites (Appendix 2), as designated within the emerging St Helens Local Plan Policies Map and the site also falls within the Liverpool City Region Ecological Network. Rachel Hacking Ecology has been appointed to review the appropriateness of these ecological designations.

MEAS commented on 11th May 2018, which was prior to MEAS receiving the Great Crested Newt and reptile survey results. The MEAS comments deal specifically with the LWS designations (Parr Flat LWS and Grassland by Parr Flat LWS).

Habitats

MEAS is of the opinion that following the detailed botanical survey, the LWS sites have not altered substantially since the last designation in 2003 and the features that the sites were designated for still remain i.e. Lowland Raised Bog, a UK Priority Habitat. The 2017 botanical survey identified M25 mire habitat and H1 dry heath

habitat on site, both of which are habitats that can be found on raised bog.

However, within the habitats on site there has been a significant reduction in the species diversity per habitat and without appropriate management, this downward trend is likely to continue, thereby reducing the likelihood of the habitats retaining their UK Priority status. Moreover, the mire and dry heath habitats are reducing* and are isolated, with no direct habitat connectivity to other mire and dry heath areas, indicating that species recruitment will be impeded.

*The reduction in extent of the different habitats can be seen when comparing the 1999-2000 Phase 1 mapping undertaken for St. Helens (Appendix 3) and the 2017 RHE Phase 1 Map (Appendix 4). The 1999-2000 map clearly shows a large expanse of 'heathland' (shown in pink) within Parr Flat LWS, whereas the extent of heathland in 2017 is restricted to a very small area on the eastern edge of the site. The 1999 target note describes the 'heathland' habitat as "wet dwarf shrub heath…dominated by 'common heath'" (old name for *Calluna vulgaris*). Looking at the 2017 botanical survey, there is no longer any *Calluna vulgaris* left in this area. The *Calluna vulgaris* is now restricted to a small area on the eastern boundary (now classified as dry dwarf shrub heath). Notwithstanding this, a 2002 map was provided with the MEA comments, showing the same 'heathland' area as being classified under M25 mire but no species list has been provided. In addition, the extent of 'unimproved neutral grassland' has severely reduced and is now only found on the eastern boundary of Parr Flat LWS, whereas in 1999-2000, it is shown as two large areas within Grassland by Parr Flat LWS. Ruderal vegetation, including the invasive Japanese Knotweed, has established at the expense of this habitat.

Given the above, it is incorrect to state that the features of designation have not altered since the 2003 designation, albeit that there is a dearth of data from MEAS since the 1999-2002 surveys.

MEAS state that lowland raised bog is protected through Local Plan Core Strategy Policy CQL3, which states that "*The Council will protect and manage species and habitats, as well as enhancing and creating habitats and linkages between them by: 1. Identifying the location of sites of importance for biodiversity and geological conservation …..and bringing sites into active conservation management*". However, for a habitat that is isolated and such a rare presence in the borough, it is somewhat surprising that MEAS has never engaged with the landowner to discuss appropriate management and the landowner was unaware of the LWS designations (anecdotal evidence from client team) until the emerging Local Plan consultation period. MEAS has stated that only a single site visit has taken place since designation and this was 13 years post designation, with no management plan produced. From visiting the site many times between 2017 and 2018, RHE has been able to assess the habitats and can compare their degradation from the original data used for the 2003 designation and between the visits. The site is unmanaged and has been since the designation. No 'active conservation management' has taken place. Therefore, it would appear that this particular example of lowland raised bog is not protected at all through Policy CLQ3.

Given the current state of Parr Flat LWS and Grassland by Parr Flat LWS, it is unlikely that they would satisfy the North Merseyside Local Wildlife Site selection guidelines and it must be argued that retaining a small portion of unmanaged land and degraded habitats within the St. Helens LWS haul effectively waters down the protection of good designated sites.

However, if the site is brought forward for residential development, a large ecological mitigation zone will be created at the southern boundary of the site, retaining and enhancing some of the lowland raised bog to make a better-quality habitat, with longevity secured through appropriate management. This ecological zone can still be designated as an LWS and will satisfy the criteria for an LWS and will be brought into management. The retained and enhanced area of raised bog will connect the extent of raised bog at Colliers Moss LWS, immediately to the south of the site. The ecological mitigation zone, as well as habitat connectivity within the site and out to adjoining land through appropriate landscaping, will also ensure that the Liverpool City Region Ecological Network retains and improves its integrity. Policy BFP ENV2[1] will also be satisfied, as the aims for this policy include "*Increasing connectivity between priority habitats by creating corridors and stepping stones*", which will be achieved through an enhanced area of raised bog and connectivity to the raised bog to the south.

Protected Species

MEAS had not received the data and reports from the protected species surveys, undertaken in spring 2018, by the time the comments were released. The reports can now be viewed and to summarise, Great Crested Newt was not found in any of the ponds surveyed and no reptiles were located on site. Therefore, there are no protected species constraints to the site being developed. The protected species criteria for LWS designation does not apply to this site.

Summary

It is considered that the two current LWSs are not worthy of continued designation across the whole site and are not securely protected because of a lack of appropriate management. The habitats have degraded and will require management to restore them. The site will not be managed if it remains in its current state. MEAS is primarily concerned with the retention of lowland raised bog on the site but this only occurs within Parr Flat LWS and is in a poor state. MEAS does not create an argument to retain the designation of Grassland by Parr Flat LWS. However, if the development is brought forward, this will bring with it secure, appropriate management, to enhance the southern part of the whole site, retaining and creating lowland raised bog and other ecologically valuable habitats, with an aim to increase the species diversity within the habitats and connect them to the south. This would then better satisfy the LWS designation criteria, and the Local Plan policies. There are no protected species constraints on the site. Therefore, it is considered that de-designating the site and encouraging re-designation of the southern part of the site with a secure future will enhance the LWS stock of St. Helens.

Dr. Rachel Hacking

[redacted]

Principal Ecologist

Rachel Hacking Ecology Limited Company No: 6753682

VAT No: 117 4959 90

[1] Bold Forest Park Area Action Plan

APPENDIX 1 – MEAS COMMENTS 11th MAY 2018

Merseyside Environmental Advisory Service
1st Floor Merton House, Stanley Road
Bootle, Merseyside, L20 3DL
Director: Alan Jemmett, PhD, MBA

Enquiries: [redacted]

Contact: [redacted]
Email: measdcconsultations@sefton.gov.uk

MEMO

To: [redacted]
Organisation: St Helens Council

From: [redacted]

Your Ref:
File Ref: 11/2
Date: 11 May 2018

Additional ecological survey
St Helens Local Plan preferred options and Green Belt review consultation – representation in relation to the land south of Fleet Lane, Parr

Thank you for consulting Merseyside Environmental Advisory Service in respect of this respect of this representation to the Local Plan consultation response.

Summary

1. The proposed allocation site includes two Local Wildlife Sites these are:

    - Parr Flat LWS; and
    - Grassland by Parr Flat LWS.

2. The landowner, Metacre Ltd, has submitted the following documents which I have reviewed and provide the following advice:

    - *Letter from* [redacted] *to St Helens Council dated 10 January 2018;* and
    - *Botanical survey and Local Wildlife Site Assessment at land off Fleet Lane, St Helens, Rachel Hacking Ecology, August 2017.*

3. In summary, the submitted information has not shown that the LWS sites have changed substantially since the last review of designation in 2003 and the features of designation remain. Parr Flatt LWS contains Priority habitat (NERC Act) Lowland raised bog which is protected through Local Plan Core Strategy policy CQL3, this habitat type is particularly rare within St. Helens. I therefore advise that both LWS sites listed above should be retained within the forthcoming Local Plan. I provide detailed reasoning for this advice below (paragraphs 6 to 12).

4. The survey report provides NVC survey of the habitat on site. The letter and report confirm that Great crested newt survey and reptile survey are to be

undertaken between March and June 2018. The results of these surveys are awaited and further advice will be provided once these survey reports have been submitted; however, this will not affect the retention of the LWS designations.

5. The LWS sites are within Bold Forest Park Area Action Plan area and policy BFP ENV2 applies. The proposed loss of LWS would not comply with this policy. The site is also within Liverpool City Region Ecological Network and policy LPC08 of the emerging Local Plan is relevant. Any allocation will need to be assessed in the context of these wider networks and policies.

Review of the submitted surveys

6. The submitted surveys, both from 2016 and 2017 confirm that the following Phase 1 habitats are present within the sites:

    - Marshy grassland;
    - Dwarf scrub heath; neutral grassland;
    - Tall ruderal herb;
    - Japanese knotweed stands;
    - Continuous scrub;
    - Water bodies;
    - Swamp;
    - Scrub; and
    - Spoil heaps.

7. Figure 2 of the submitted 2017 survey report maps the habitats recorded on site.

8. The submitted survey provides NVC of habitats on both LWS sites. The NVC confirms the following:

    - Marshy grassland on site is identified as M25 *Molinia caerulea – Potentilla erecta* mire*;*
    - Neutral grassland is identified as MG11 *Festuca rubra – Agrostis stolonifera – Potentilla anserine* grassland;
    - Dry dwarf scrub is idenitifed as H1 *Calluna vulgaris – Festuca ovina* heath.

9. Mire habitat (NVC M25) and lowland heath (NVC H1) are identified within the definition of Priority habitat (NERC Act) Lowland Raised Bog. Review of the St Helens Phase 1 in 1999 identified that lowland raised bog and mire habitats within St Helens comprise of just 0.04% of the habitats by area[2]. This illustrates the importance of protecting the remaining fragments of these habitats within St Helens.

10. The submitted survey report and letter conclude that the LWS sites have degraded as a result of encroachment by Purple moor grass (*Molinia caerulea*) and scrub and that some habitats are no longer present. However, comparison of the submitted survey with the St Helens Phase 1 (1999) and NVC (2002) (provided within Appendix 1 of this memo) shows that there is very little change in habitats and habitat distribution on both LWS sites. The mosaic of habitats present at the time of designation review remains present.

[2] Report on the Digital Capture of St Helens 1999/2000 Phase 1 Habitat Survey, Merseyside Environmental Advisory Service 2005.

11. There have been some changes to species composition of the habitats, for example the proportion of heather within the heath/mire has reduced however the Phase 1 from 1999 and NVC from 2002 confirm that heather was never the dominant species within this habitat. It is not clear what the reasons for reduction in heather on site area since 1999, however, target note E8/3 (See Appendix 1) identifies drainage and excavation works which may have affected the hydrology of the moss. NVC from 2002 also confirmed that the heath/mire habitat on site as M25 illustrating that this habitat has not changed significantly.

12. Some change in habitats and species composition is not unexpected over time. However, habitats and species composition remain largely the same as those at the time of the previous LWS review therefore the LWS designation should be retained in its current form. Some changes to the LWS sites are as a result of degradation of habitats due to damage due to storage of materials on site, drainage, the creation of spoil mounds and introduction of Japanese knotweed. This degradation is localised and is capable of restoration and does not form a reason for de-designation of the LWS.

Future development

13. The landowner previously submitted a plan showing potential site layout with areas of habitat to be retained (*Indicative site layout and context plan, Fleet Lane, MBED architects, drawing number 16.1055 P (00) 202)*. This proposed site layout would not be acceptable as it would not maintain LWS status or maintain Priority Habitat present on site (NERC Act).

14. Should the landowner wish to bring forward the site then there are a number of issues which would need to be considered, these are:

- Drainage – the site is wet and the wetland habitats form part of the reasons for designation. Drainage which may be required for development may result in drying of the LWS site which would result in a significant effect and would not be acceptable;
- Peat – the site is underlain by peat and this is likely to present construction difficulties and may require excavation and compaction of peat. The effects of these groundworks may impact on the LWS and adjacent mossland sites. The effects of any ground works on the LWS's would require full and detailed assessment. Building difficulties due to peat may also mean that agreed site layouts for the protection of LWS may need to change once ground investigations are undertaken;
- Any assessments submitted with any future development proposals would need to fully integrate ecology, hydrology and ground conditions;
- Protected species survey for great crested newt and reptiles will be required with any future planning application; and
- Retention of the LWS and long-term management and monitoring – any development within the boundary of the LWS would require that the development ensures that retained habitats retain the LWS value and that long-term management and monitoring is secured.

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

[redacted]
Ecologist

APPENDIX 2 – LOCAL WILDLIFE SITE DESIGNATION BOUNDARIES

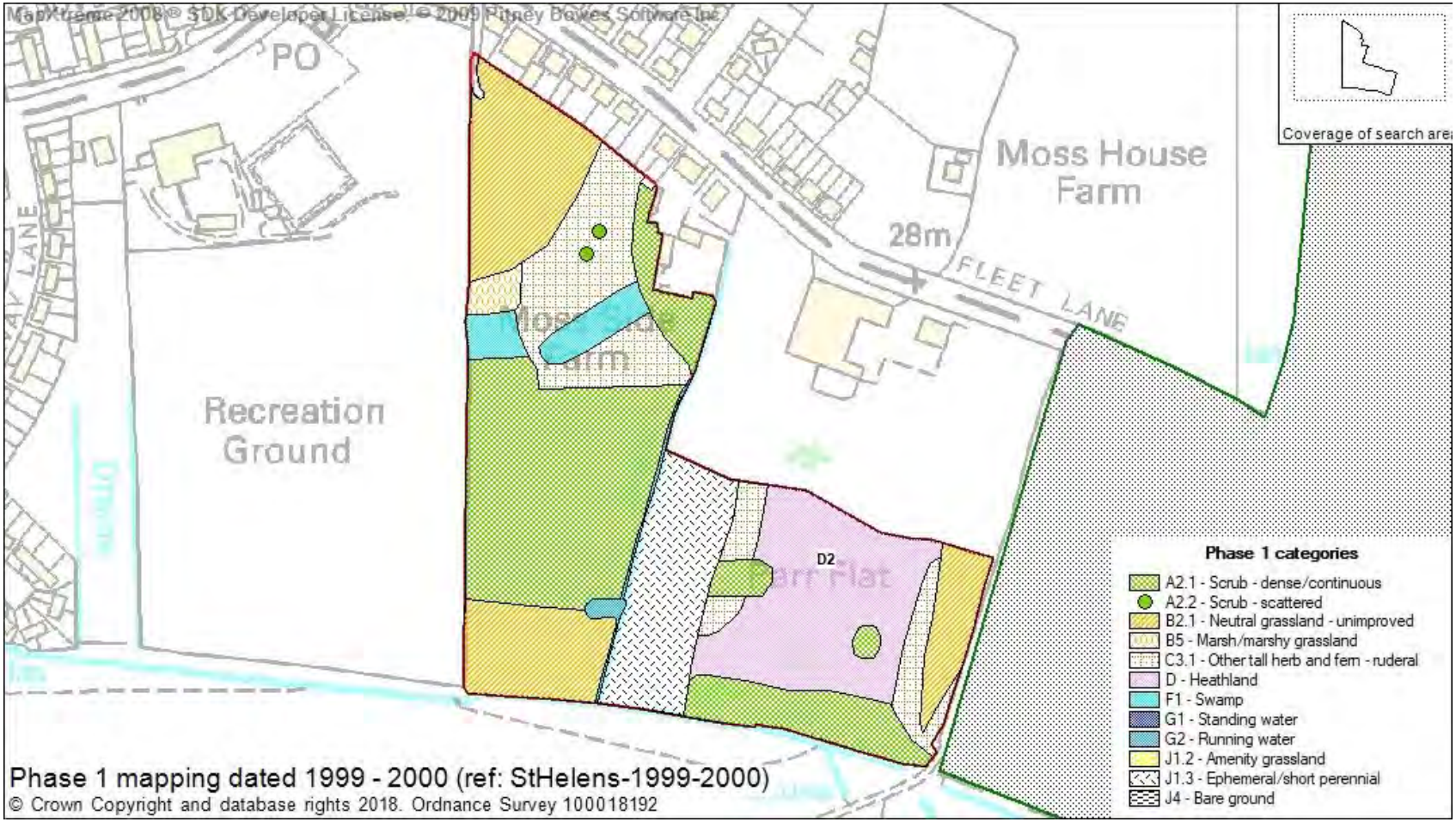
Grassland by Parr Flat LWS Boundary:

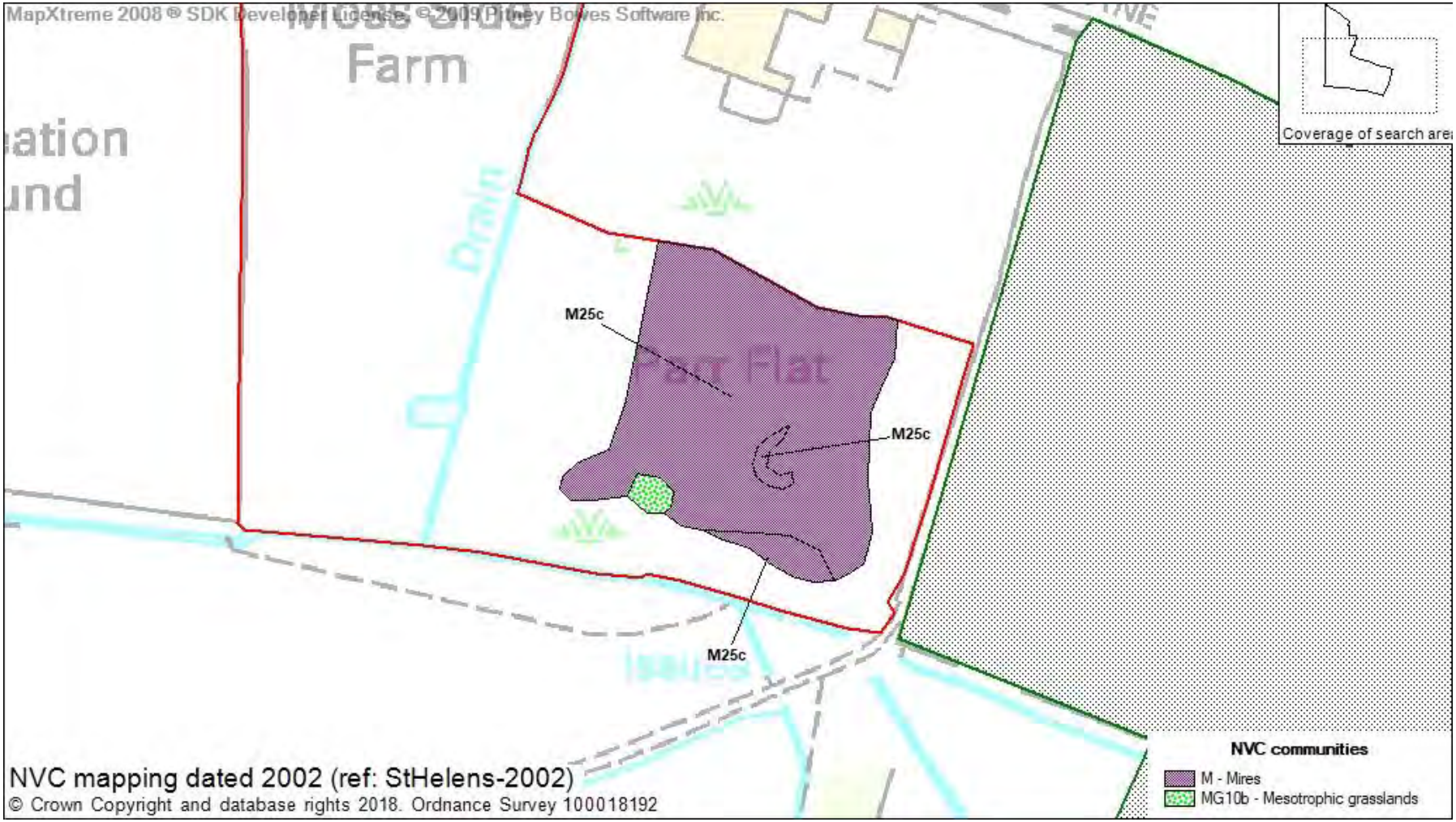


Parr Flat LWS Boundary:

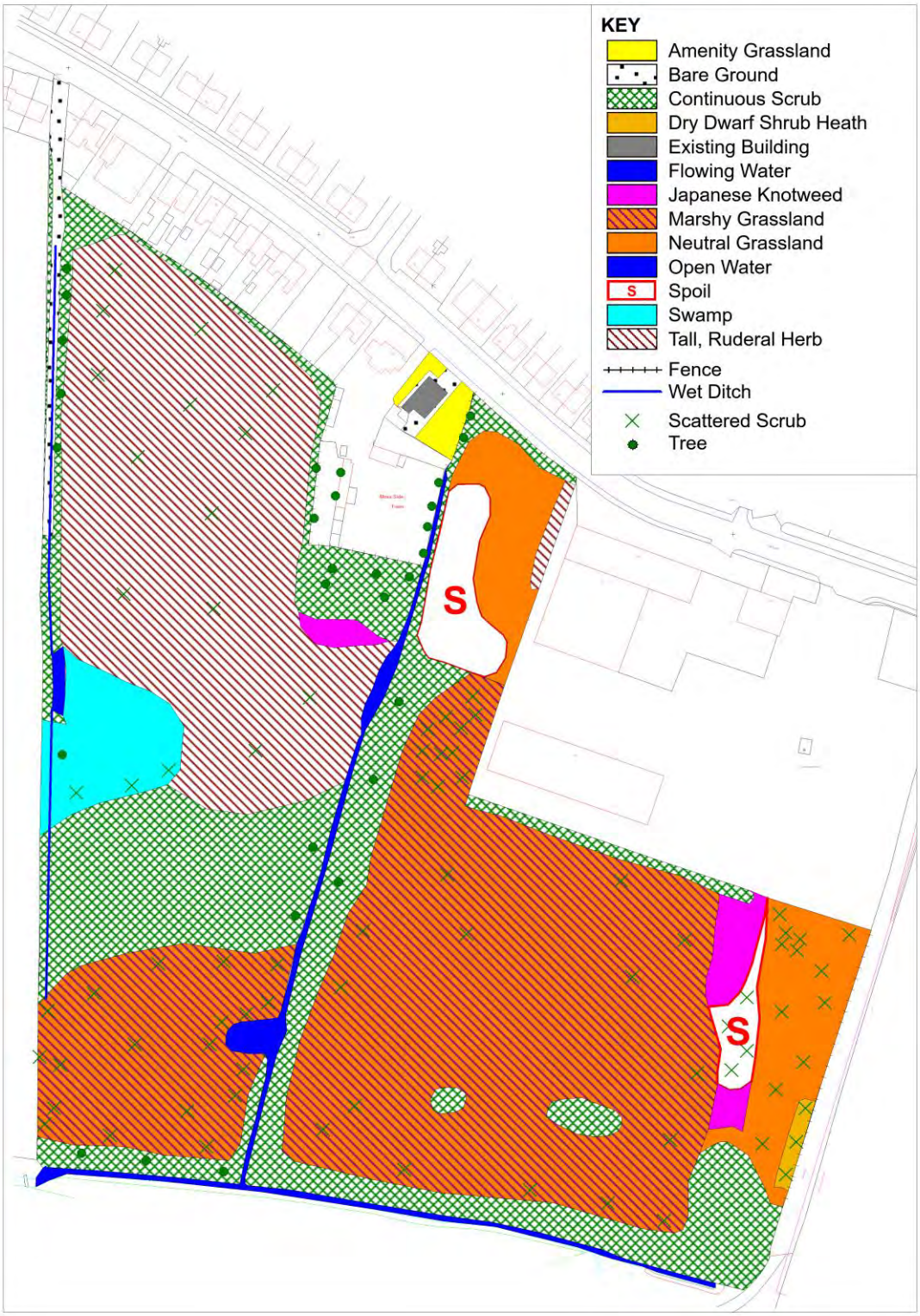


APPENDIX 3 – 1999 PHASE 1 HABITAT MAP & NVC MAP




MapXtreme 2008 ® SDK Developer License, © 2009 Pitney Bowes Software Inc.
Farm
Drain
Past Flat
M25c
M25c
M25c
Coverage of search area
NVC communities
M - Mires
MG10b - Mesotrophic grasslands
NVC mapping dated 2002 (ref: StHelens-2002)
© Crown Copyright and database rights 2018. Ordnance Survey 100018192

APPENDIX 4 – 2017 PHASE 1 HABITAT MAP (RACHEL HACKING ECOLOGY)



PO3616

PF1347

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

1420

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: 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:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☑ (Via Email)	No ☐

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

RETURN DETAILS

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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

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

FURTHER INFORMATION

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Telephone: 01744 676190

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

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

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	LPC08	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 ☐	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

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/GBP_074 and its allocation for housing as we believe the councils ~~arguments~~ 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 a 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:

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 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. 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). 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.

PO3617

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).

1421

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

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
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NEXT STEPS

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

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

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	LPC08	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 ☐	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

Please continue on a separate sheet if necessary

PF1348.pdf

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/GBP_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 Helens Local Plan and Green Belt Review and a 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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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination		**Yes**, I wish to participate at the oral examination

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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.

PF1345.pdf

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."

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   SA1. To protect and enhance biodiversity
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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

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PO3618

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

(1) - LPA01
(2) - LPA02
(3) - Green 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/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

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

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

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

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

Bold and Clock Face Village Action Group.

12 MAY 2019

St.Helens Council

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

Ref: LPSD

(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 Postcode: WA9 4FZ	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	13.05.19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

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post to:

Local Plan
St.Helens Council
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)

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

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Telephone: 01744 676190

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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 ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 LPC08: Ecological Network

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.*
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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:

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

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

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

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

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

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

Policy LPC08: Ecological Network

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPC08 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 2018-2021[1] as an adopted development plan document should play a key role in guiding decisions.

Policy LPC08 makes no specific reference to the Bold Forest Park Area Action Plan. The Group believe the Area Action Plan, as part of an adopted development plan, a key issue of which was safeguarding and enhancing the environment, should be a key consideration and the Council have failed in their legal compliance by not considering this.

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 ecological network.

Objective 5 of the Area Action Plan is to:

'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.'

---

[1] St Helens Council Local Development Scheme 2018-2021, Section 2.1
[2] Bold Forest Park Ecological Network Development, Daan Liebregts, 2013, Page 33

The Bold Forest Park Area Action Plan Policy BFP ENV2: Ecological Network

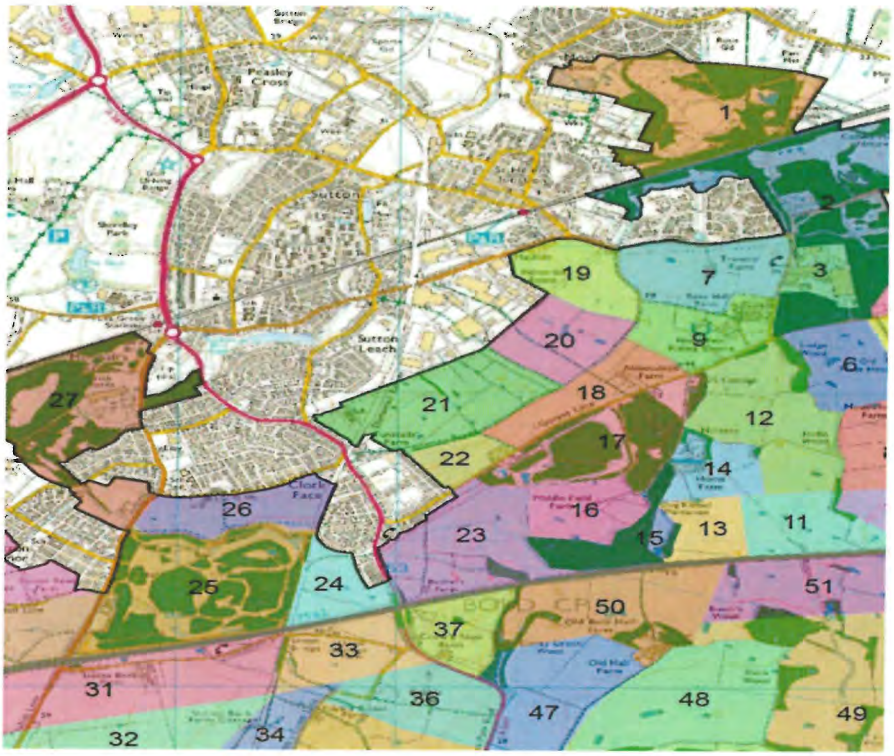
St Helens Council will within a woodland and farming framework enhance biodiversity in Bold Forest Park by developing an ecological network which reduces habitat fragmentation and increases the resilience of wild life in the forest park by:

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.

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 Areas[3]

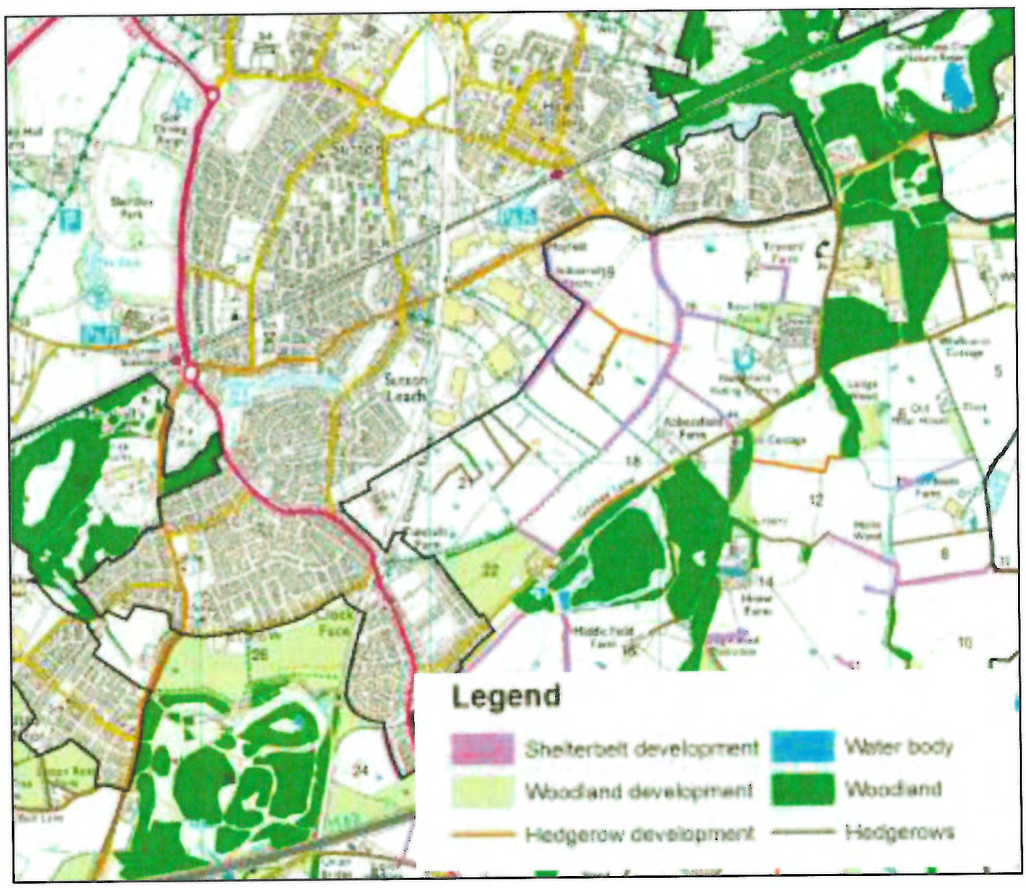


Area 4HA covers a patchwork of habitats including hedgerow and field margin, ponds (including pond clusters), woodland, unmanaged grassland, permanent grassland both grazed and un-grazed, arable farmland and an LWS at Tunstalls Farm. Many of these are considered priority habitats, as such should be safeguarded. 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



PO3619

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

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

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

Policy	Policy LPA04.1, Stategic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "'Very special circumstances' will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."
The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middlewich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If, the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05 06

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 07

pollution, noise and air pollution. The effect would be a reversal of the intent so recently shown by St Helens Council in the recent AAP of 2017. 07

With respect to pollution from diesel lorries and other additional traffic generated in the Great Sankey area: One of the current occupants of a warehouse on Omega South – Amazon – operates three times as many lorries to and from their warehouse as was expected by the developers of Omega for the area of the development. If this were repeated for any of the warehouses proposed for the Bold Forest Park extension, it would add even more than expected amounts of pollution, noise and congestion to the roads and surrounding area. I have three young grandchildren growing up in the Whittle Hall – one of whom has spent time in hospital with asthma-related breathing difficulties on more than one occasion. For this additional reason, I oppose an extension of the Omega South development across the border into St Helens and would ask if a case of 'exceptional circumstances' has been made? 08 09

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

In line with the above comments, to make the report sound, it is proposed the Draft Local Report would have the references to the development of the area designated 1EA removed, such that this area remains part of the current Green Belt. (Minor changes may be required to various supporting documentation where this proposal has been mentioned.)

If, following the review, the argument for proceeding with removal of the area 1EA from Green Belt for the stated purpose is considered justified, in the light of the above and any other arguments presented, then a statement of intent in the documentation to minimise the environment impact on the Bold Forest Park area, and facilitate enhancements where possible, would seem appropriate.

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

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

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

Response Date	3/11/2019 4:27:16 PM

PO3620

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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

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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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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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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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 & 8EA
LPA10, LPC09, LPC10

c. iv. Employment Types - B8

Table 8 – Employment Capacities within key St Helens Local Plan Preferred Options allocated Employment Sites

LPPO site ref	LPSD site ref	Employment Site	Site Area	Jobs (FTE)	Employment Types
EA2	2EA	Florida Farm North, Haydock	35.17	1,487	B8
EA12	11EA	Gerards Park, St. Helens Town Centre	0.95	91	B1(c); B2
EA11	10EA	Land at Lea Green Farm West, Thatto Heath	3.84	321	B1, B2, B8
EA7	6EA	Land at Millfield Lane and Liverpool Road, Haydock	20.58	1,399	B2, B8
EA3	3EA	Land North of Penny Lane, Haydock	11.05	516	B8
EA4	2ES	Land North East of Junction 23 M6, Haydock	42.34	2,666	B2, B8
EA5	4EA	Land South of Penny Lane, Haydock	2.16	177	B2, B8
EA6	5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	462	B2, B8
EA1	1EA	Omega South Extension, Bold	31.2	1,240	B2, B8
EA10	9EA	Land to the West of Sandwash Close, Rainford	6.96	681	B2, B8
EA9	8EA	Parkside West (Non-SRFI)	79.57	2,351	B8
EA8	7EA	Parkside Rail Terminal		40	Rail uses
EA8	7EA	Parkside East (SRFI)	64.55	2,737	B8
		Total	**306.12**	**14,167**	

Source: St Helens Council, BE Group analysis, 2017

05-09

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

OS-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.

OS-09

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) / NOx (vegetation); Particulate Matter (PM10), Fine Particulate Matter (PM2.5); Ozone (O3); Sulphur dioxide (SO2)/SOx; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO_2); Nickel (Ni); Ammonia (NH_4); 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.

OS-09

Together with the associated air pollution eCO_2 produced just from the construction of 980,000m²

OS-09

The eCO_2 of constructing 980,000m_2 each 1m³ of concrete used equates to 2.38 tonnes eCO_2, where1 tonne of concrete produces 1 tonne of eCO_2; and 1m3 of steel equates to 7.9 Tonnes of eCO_2 where 1 tonne of steel produces 1 tonne of eCO_2. The estimate for construction of eCO_2 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 eCO_2 is in the millions of tonnes.

05-09

If the concrete used was 1m in depth and the steel used was 0.5m in depth, the B8 construction eCO_2 value will be:
Concrete: 980,000m^2 x 1m x 2.38 tonnes x 1 tonne eCO_2 = 2,332,400 tonnes eCO_2
Steel: 980,000m^2 x 0.5m x 7.9 tonnes x 1 tonne eCO_2 = 3,871,000 tonnes eCO_2

05-09

Totalling **6,203,400 tonnes eCO_2** 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 eCO_2 figure does not include the thousands of HGV container movements per year to satisfy the 980,000m^2 of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO_2/tonne/kilometre for HGV. The resultant carbon emissions eCO_2 will never meet government climate change targets.

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings.
The B8 warehousing reasoning above applies to Parkside east and Parkside west.

05-09

The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

05-09

PO3621

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
Cc:
Dave Tyas, Mark Lewis
Hide Details
From: [redacted]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

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As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R.Ward PAG Response.pdf

2. lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf

3. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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

R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).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

On 13/03/2019 09:31, Dave Tyas wrote:

> Please find attached SHC response form and supporting Non-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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

(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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

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 7.5A-c 8.2A

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.

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."

7.15.2 Natural England's National Character Areas (56) Lancashire Coal Measures, (32) Lancashire and Amounderness Plain and (60) Mersey Valley provide a high level overview of the landscape around the Borough and act as a starting point to the understanding of the area's landscape character and heritage.
7.15.3 The St.Helens Landscape Character Assessment (2006) provides a more detailed overview of the landscape character of the Borough and provides borough-wide guidance on landscape and visual sensitivity, woodland planting and landscape strategies. The Character Assessment (or any future replacement) should be used as a context for site-specific assessments of development proposals.
7.15.4 The Merseyside Historic Landscape Character Study provides further context for how development should reflect, safeguard and enhance landscape heritage and local distinctiveness.

16

16

Comments
(highlighted text in 7.15.4 above to emphasise reasoning)
The Lanscape of Hermitage Green Valley will be affectect by the Drainage from the Parkside west 8EA . Due to the flooding this will cause the landscape to be seriously affected the Heritage of the Area due to the landscape of the valley.

PO3622

EL0056

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

[redacted]

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
[redacted]

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

EF0176

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: 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:	
Email:	

Signature: [redacted] **Date:** 13/03/19

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

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

Yes ☑ (Via Email) No ☐

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

PART B – YOUR REPRESENTATION

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

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

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

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

[redacted]

BARTON WILLMORE

3.70 Notwithstanding the above, our Client questions why the Policy differentiates between Zone 2 and 3 at all especially when the policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the policy to be simplified.

3.71 Our Client considers that the Council should ensure that adequate monitoring takes place across the Borough to ensure that the need for affordable housing is met. Equally however, our Client considers a policy mechanism should be established so that should an over provision of affordable housing in the borough be demonstrated, a lower requirement would be sought on new greenfield developments.

Policy LPC07: Greenways

3.72 This Policy outlines that development proposals that would affect a designated Greenway will be refused if they prejudice the continuity of public access to the Greenway; harm the integrity of the Greenway in terms of off-road linkages, character or amenity; harm the appearance of the Greenway or impede the integrity of a Greenway with regard to its function as a wildlife network.

3.73 Figure 7.2 of the New Local Plan illustrates the existing Greenway Network as well as potential new routes through it. In this regard a New Route is indicated as running through our Clients land interest.

3.74 Neither the Policy or the supporting text provide any detail as to what these new routes are, their precise location or how they will be delivered/funded. This lack of information is a cause of concern for our Client and greater clarity is required as to what this New Route will entail, its impact on the housing allocation and how this Greenway will be delivered. Accordingly, our Client is unable to support this Policy presently.

Policy LPC09: Landscape Protection and Enhancement

3.75 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are of impotence to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development the Policy provides a mechanism for mitigation and/or compensation as appropriate.

3.76 Our Client is broadly supportive of this Policy, recognising that in allocating site 4HA the Council must already consider that site suitable for development with regard to landscape impact.

PO3623

ELO117

Representations concerning the St Helens Borough Local Plan 2020-2035 SITE 4HS

Greg Leyland
to:
planningpolicy
12/03/2019 17:43
Cc:

(1) GBR (4) LPA04 (7) LPA09 (10) LPD09
(2) LPA06 (5) LPA05 (8) LPB01 (11) S.A. (13) SUS. TIA REPORTS.
(3) LPA03 (6) LPA07 (9) LPC09 (12) TIA

[redacted]

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. (1)

and there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation and / or as a last resort compensatory provision will be required.

5.3.7 The Council's future aspirations to improve the offer of St.Helens Town Centre asset out within the Strategy include the provision of new retail and leisure floorspace, subject to the appropriate policy tests. It is considered that this approach, along with steps to encourage the reuse of vacant floorspace, will address the identified quantitative and qualitative needs of residents in the Borough.

I am concerned that the Council is proposing to provide new retail and leisure space when there are already 15.8% units vacant, and question whether any new space is actually required. In particular, if the Council is proposing to use Council Tax money in order to do this, I have a major objection. Existing retail and leisure space must be made to work before considering diverting cash badly needed for education, health, roads, environmental cleanliness, police etc.etc.

What does the Council mean by 'encourage the reuse of vacant floorspace'? M&S and Tyrers, for example, were important shops for the town centre which are planning to leave, or have already left. The Council has not been encouraging enough for these businesses, so what has it learnt from their loss, and what does it intend to do for future 'encouragement'? Both aspects should be clarified to a level of detail in the plan, rather than simply stating aspirations.

(8)

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;

The area known as Eccleston Park Golf Club provides separation between the communities in Eccleston Park and Rainhill. This separation ensures the two communities are not a single urban sprawl; it allows the two sets of residents to maintain a sense of belonging and 'sense of place'; it also helps to preserve, and is intrinsic to the character of the two settlements.

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;

Should a housing development go ahead at any time in the future on the EPGC land, the impact to both the Rainhill and Eccleston Park residents will be massive. Both areas will lose their local distinctiveness, and the current physical landscape will be lost and unrecognizable.

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

(9) & (2)

cannot be avoided, suitably mitigated or compensated, planning permission will be refused unless the development would bring exceptional benefits that would outweigh the harm.

The visual character of EPGC and the surrounding areas will be significantly negatively impacted if the land loses its green belt status and is eventually build on. Consequently, would this mean that residents of both the Rainhill and Eccleston Park communities who have campaigned and objected to the change of status of Eccleston Park Golf Club from green belt, would be compensated?

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 EPGC land is a 'valued landscape'. It contributes to the character of the whole area by providing open space, greenery, trees, wildlife sanctuary, hedgerows and urban community separation and boundaries – all of which add to its local residents' quality of life. It should be protected by ensuring its greenbelt status is retained.

(9) & (2)

8.25 Policy LPD09: Air Quality

Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:

c) lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment, that would require a new AQMA to be created; or

With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html). Other studies are now claim similar results.

Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.

(10)

PO3624

St Helens Local Plan 2020 - 2035, Submission Draft - Representations
Dan Ingram
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:20

[redacted]

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
[redacted]

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 WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

[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 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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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.

EL0192A.2.pdf

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

PART B – YOUR REPRESENTATION

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No ☐
Sound?	Yes ☐	No ☐
Complies with the Duty to Cooperate	Yes ☐	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER SITES.

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

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

Marnel Park Development Strategy.pdf
EL0192

St Helens Borough Local Plan 2020 - 2035
Submission Draft

Representations on behalf of Miller Homes

March 2019

[redacted]

BARTON WILLMORE

Marnel Park Development Strategy.pdf
EL0192

community, including the need to provide aspirational dwellings and to drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. The Policy should be flexible and allow for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured. 31

Policy LPC02: Affordable Housing

9.30 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3, and with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 3 and as such the above requirements would apply.

9.31 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.

9.32 Our Client broadly supports this Policy; the provision of affordable housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the planning application process. It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements afforded by Policy LPA05. 32

9.33 Notwithstanding the above, our Client does question why the Policy differentiates between Zone 2 and 3 at all especially when the Policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the Policy to be simplified. 33

9.34 Finally, our Client considers that adequate monitoring must take place across the Borough to ensure that the need for affordable housing is met.

Policy LPC09: Landscape Protection and Enhancement

9.35 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are important to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and

Marnel Park Development Strategy.pdf
EL0192

requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development, the Policy provides a mechanism for mitigation and/or compensation as appropriate.

9.36 Our Client is broadly supportive of this Policy, recognising that in allocating site 8HA the Council consider the site to be suitable for development with regard to landscape impact. 34

Policy LPC012: Flood Risk and Water Management

9.37 This Policy advocates a sequential approach in determining whether a site is suitable for development as well as providing detailed criteria against which developments should adhere to in respect of water, drainage and flood risk.

9.38 Our Client is broadly supportive of this Policy. With regards to their land interests at Site A recognise that the Council consider the site to be suitable for development with regard to flood risk. Furthermore, our Client would re-iterate that their Site B land interests, which are partially within Flood Zone 3, are also suitable for development given the independent flood modelling exercise that they have commissioned, and which adequately demonstrates that more of the Site is developable than previously envisaged by the Council. The allocation and development of Site B also offers the opportunity to deliver the wider community benefits, as outlined earlier within Section 8 of this representation. 35

Policy LPD01: Ensuring Quality Development

9.39 This Policy outlines detailed criteria against which all development proposals will be assessed. The Policy divides these criteria into three separate categories, these being Quality of the Built Environment; Environmental Quality; and Resource Management.

9.40 Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan. 36

Policy LPD02: Design and Layout of New Housing

9.41 This Policy outlines detailed design criteria for new residential developments to which all development proposals will be expected to adhere. Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan.

PO3625

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

(1) - LPA01
(2) - LPA02
(3) - Green 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/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

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

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

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

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

Bold and Clock Face Village Action Group.

12 MAY 2019

St.Helens Council

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

Ref: LPSD

(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 Postcode: WA9 4FZ	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13.05.19

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Yes ☒ (Via Email) No ☐

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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 ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 LPC09: Landscape Protection and Enhancement

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

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

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

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

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

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

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

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

Policy LPC09: Landscape Protection and Enhancement

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPC09 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 2018-2021[1] as an adopted development plan document should play a key role in guiding decisions.

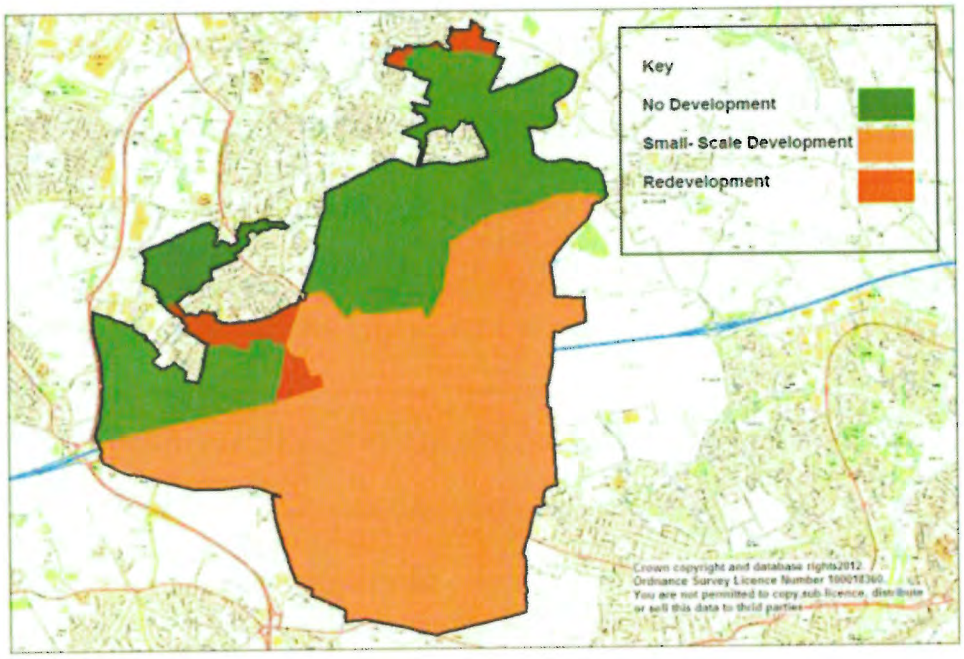
Policy LPC09 makes no specific reference to the Bold Forest Park Area Action Plan. The Group believe the Area Action Plan, as part of an adopted development plan, a key issue of which was safeguarding and enhancing the environment, should be a key consideration and the Council have failed in their legal compliance by not considering this.

'The landscape character of Bold Forest park is urban fringe farming coupled with raised spoil heaps, which have been reclaimed to woodland.'[2] The area is part of the Lancashire Coal Measures (NCA 59) of which Natural England's National Character Area Advice identifies mining and agriculture as a major influence. 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.'[3] The St Helens Landscape Character Assessment analysis for the Forest Park was summarised as 'fairly robust character with the ability to accommodate some small-scale development. The analysis went further to identify some no-development areas. Site 4HA is covered entirely by a recommended no development area. A Landscape Character Assessment for St Helens by Land Use Consultants considered

[1] St Helens Council Local Development Scheme 2018-2021, Section 2.1
[2] Bold Forest Park Area Action Plan, Adopted 2017, Page 15
[3] Bold Forest Park Area Action Plan, Adopted 2017, Page 15

development within the character area should be avoided to maintain an open rural landscape character.[4]

Figure 1: Potential For Development Map[5]



Both 4HA and 5HA cannot be described as small-scale development. The Council have failed to explain why the recommendations have been ignored and provide any evidence to justify this.

[4] A Landscape Character Assessment for St Helens, Land Use Consultants, January 2006, Page 135
[5] Bold Forest Park Area Action Plan Supporting Technical Document, Page 15

PO3626

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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]

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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-Techincal 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.

EF0059 / 01.25

St.Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
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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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [redacted] **Date:** 13/03/2019

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EF0059
01-25

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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 Postcode: WA2 8SJ	Address: 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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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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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

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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)

	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.

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

EF0059/01-25
Policies:- LPA10, LPA04, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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 & 8EA
LPA10, LPC09, LPC10

c. iv. Employment Types - B8

Table 8 – Employment Capacities within key St Helens Local Plan Preferred Options allocated Employment Sites

LPPO site ref	LPSD site ref	Employment Site	Site Area	Jobs (FTE)	Employment Types
EA2	2EA	Florida Farm North, Haydock	35.17	1,487	B8
EA12	11EA	Gerards Park, St. Helens Town Centre	0.95	91	B1(c); B2
EA11	10EA	Land at Lea Green Farm West, Thatto Heath	3.84	321	B1, B2, B8
EA7	6EA	Land at Millfield Lane and Liverpool Road, Haydock	20.58	1,399	B2, B8
EA3	3EA	Land North of Penny Lane, Haydock	11.05	516	B8
EA4	2ES	Land North East of Junction 23 M6, Haydock	42.34	2,666	B2, B8
EA5	4EA	Land South of Penny Lane, Haydock	2.16	177	B2, B8
EA6	5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	462	B2, B8
EA1	1EA	Omega South Extension, Bold	31.2	1,240	B2, B8
EA10	9EA	Land to the West of Sandwash Close, Rainford	6.96	681	B2, B8
EA9	8EA	Parkside West (Non-SRFI)	79.57	2,351	B8
EA8	7EA	Parkside Rail Terminal		40	Rail uses
EA8	7EA	Parkside East (SRFI)	64.55	2,737	B8
		Total	**306.12**	**14,167**	

Source: St Helens Council, BE Group analysis, 2017

05-09

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

OS-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.

OS-09

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) / NOx (vegetation); Particulate Matter (PM10), Fine Particulate Matter (PM2.5); Ozone (O3); Sulphur dioxide (SO2)/SOx; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO_2); Nickel (Ni); Ammonia (NH_4); 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.

OS-09

Together with the associated air pollution eCO_2 produced just from the construction of 980,000m²

OS-09

The eCO_2 of constructing 980,000m_2 each 1m³ of concrete used equates to 2.38 tonnes eCO_2, where1 tonne of concrete produces 1 tonne of eCO_2; and 1m3 of steel equates to 7.9 Tonnes of eCO_2 where 1 tonne of steel produces 1 tonne of eCO_2. The estimate for construction of eCO_2 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 eCO_2 is in the millions of tonnes.

05-09

If the concrete used was 1m in depth and the steel used was 0.5m in depth, the B8 construction eCO_2 value will be:
Concrete: 980,000m^2 x 1m x 2.38 tonnes x 1 tonne eCO_2 = 2,332,400 tonnes eCO_2
Steel: 980,000m^2 x 0.5m x 7.9 tonnes x 1 tonne eCO_2 = 3,871,000 tonnes eCO_2

05-09

Totalling **6,203,400 tonnes eCO_2** 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 eCO_2 figure does not include the thousands of HGV container movements per year to satisfy the 980,000m^2 of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO_2/tonne/kilometre for HGV. The resultant carbon emissions eCO_2 will never meet government climate change targets.

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings.
The B8 warehousing reasoning above applies to Parkside east and Parkside west.

05-09

The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

05-09

PO3627

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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]

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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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)
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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 Postcode: WA2 8SJ	Address: 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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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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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

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	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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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

Policy LPC10 7EA & 8EA

7.16 Policy LPC10: Trees and Woodland

17

17

Policy LPC10: Trees and Woodland

1. The Council will, working where necessary with the Mersey Forest and other partner organisations, seek to increase the extent of tree cover across the Borough and to protect and enhance the multi-purpose value of trees, woodlands and hedgerows.
2. New development, as appropriate having regard to its scale and nature, will be required to include the planting of new trees, woodlands, hedgerows and / or financial contributions towards off-site provision. Arrangements should be made for any tree(s) or hedgerow(s) that are planted to be replaced in the event of failure or damage within a prescribed period.
3. Proposals for new development will only be permitted if they would conserve, enhance and / or manage existing trees, woodlands and hedgerows as appropriate, for example by being laid out to provide adequate spacing between existing trees and buildings and including long term management proposals.
4. Any development proposal that would affect a site containing tree(s) or woodland must be accompanied by a tree survey and an arboricultural constraints/implications report, produced to the current British Standard, to enable the effect of the development on the tree(s) to be properly assessed and appropriate tree protection measures to be identified. Any approved tree protection measures must then be maintained throughout the period of any demolition and / or construction works.
5. Development resulting in the loss or deterioration of any area of ancient woodland or of any ancient or veteran tree will be refused unless there are wholly exceptional circumstances in which the need for, and benefits of, the development would clearly outweigh any resultant loss and a suitable mitigation strategy exists.
6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period.

7. Proposals that would enhance the value and / or contribution of woodland in respect of: recreational or educational needs; health; the landscape or townscape; heritage; biodiversity; tourism; and / or economic regeneration will be supported.

7.18 Reasoned Justification

7.18.1 The Council supports the development of the Mersey Forest as part of the wider Northern Forest along the M62 corridor, as a key measure to ensure the Borough and the wider region is attractive and resilient to climate change.

7.18.2 Trees and woodlands are an integral component of Green Infrastructure forming part of the network of natural habitats and improving the visual appearance of the countryside and urban areas. They also provide opportunities for the positive use of the Green Infrastructure for recreation, education, health, biodiversity, regeneration and mitigation of adverse effects caused by climate change, air pollution and water run-off. Their value is recognised in the Regional Forestry Framework Woodland Strategy, St.Helens Landscape Character Assessment, North Merseyside Biodiversity Action Plan and Targets, Town in the Forest Initiative and Policy for Nature St.Helens.

7.18.3 The successful retention of healthy trees and planting of new trees as part of a new development can have numerous benefits for the community. In particular, trees can:

- enhance landscape character (in areas where trees are appropriate as guided by the St.Helens Landscape Character Assessment);
- be a vital component of Green Infrastructure;
- help to create a more positive image of an area and thereby encourage economic regeneration and inward investment;
- soften and screen buildings;
- enhance property prices;
- provide a vital role in respect of biodiversity and the urban ecosystem by helping to support a great variety of wildlife;
- save energy consumption through their moderation of the local climate;
- produce oxygen and help to lock up carbon emissions that contribute to global warming;
- help to stabilise ground;
- absorb water, control run-off and so help reduce flood risk;
- reduce noise by acting as a sound barrier;
- help to filter out pollution;
- provide shade;
- help alleviate the effects of extreme temperature and help to filter out harmful ultra violet radiation;
- help to improve mental wellbeing and reduce the stress of urban living; and
- form an important part of the heritage of an area.

7.18.4 The Council is a longstanding partner in the Mersey Forest, that was established

in 1991 with a vision to "get more from trees" to help make Merseyside and North Cheshire one of the best places in the country to live. Since then around 3,000ha of woodland or nine million trees have been planted. Woodland cover has doubled, from 4% to 8%, at a rate of three times the England average. The maturing woodland, including the former colliery sites now collectively known as Bold Forest Park, provides a recreation resource for much of the Borough and neighbouring authorities. The Mersey Forest Plan is a long term and strategic guide to the work of the Forest and its partners. In accordance with national planning policy it forms a material consideration in deciding planning applications.

7.18.5 National policy also requires local planning policies and decisions to contribute to and enhance the natural local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital – including the economic and other benefits of trees and woodland.

7.18.6 Woodlands have a wide range of benefits recognised in both the Mersey Forest Plan and the North West Regional Forestry Framework. Of particular significance in St.Helens is the contribution to urban regeneration. The Local Plan will be instrumental in delivering the St.Helens Woodland Strategy that was prepared in response to the City Growth Strategy objective of creating the Town in the Forest.

7.18.7 The North West Regional Forestry Framework is part of a wider national agenda on the protection, conservation and management of trees and woodlands across the UK. The Framework recognises the diverse, habitat rich and thriving 'green tourism' opportunities of trees and woodlands and sets out 'An Agenda for Growth' to help shape the woodland and forestry sector over the next 20 years.

7.18.8 Town in the Forest (2006) recognises the importance of St.Helens Borough undergoing an urban renaissance and utilising the urban fringe as a mechanism for urban renewal, through the development of linear forests in urban areas and connecting to community woodlands on the periphery.

7.18.9 All trees have a potential value to the character and amenity of the area. While particularly important trees will continue to be protected by Tree Preservation Orders, Policy LPC10 recognises that other trees affected by development should be identified, safeguarded, and where necessary, replaced.

7.18.10 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011) builds on the Natural Environment White paper and provides a comprehensive picture of how the Government will implement our international commitments. It aims to halt overall biodiversity loss and support healthy, wellfunctioning ecosystems and establish coherent ecological networks. In relation to forestry it aims to bring a greater proportion of existing woodlands into sustainable management and expand the area of woodland in England.

7.18.11 The Government's 25 Year Environment Plan (2018) has policies that include embedding an 'environmental net gain principle for development, including housing and infrastructure. As well as a focus on woodland to maximise its many benefits, including supporting the development of a new Northern Forest and larger scale woodland creation, it aims to create more green infrastructure and secure more tree planting in and around towns and cities. The value of trees in the landscape is also recognised in the St.Helens Landscape Character Assessment (2006).

7.18.12 All trees that are to be retained on site should be protected throughout the period

of development activity by protection measures. Proposals must also be supported by clear tree surveys, arboricultural implications / constraints plans, and tree protection plans. All work must comply with relevant British Standards that are extant at the time that the development is proposed and / or takes place.

17

7.18.13 The St.Helens Trees and Development SPD (2008) sets out further guidance to enable delivery of high quality developments that include new tree planting and the protection of existing trees as an integral part of their design. As woodlands are an important natural asset they are also subject to the controls set out in Policy LPC06. The St.Helens Nature Conservation SPD provides further guidance on the Council's approach, crucial parts of which are to ensure that appropriate mitigation or, as a last resort, compensation for any harm or loss to habitat(s) is made.

17

Comments

(highlighted text in 7.18.11 above to emphasise reasoning)

The 25 year Environment Plan (2018) and new Northern Forest and larger scale woodland creation. This must has included 8EA (now LOCAL 10LP) as an important area that contributes to the Northern Forest. To which the Local People will approve.

PO3628

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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

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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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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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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
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

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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

19-22 Policies LPC10, LPC12, LPC06, LPC11 Sites 7EA & 8EA

7.22 Policy LPC12: Flood Risk and Water Management

Policy LPC12: Flood Risk and Water Management

Flood Risk

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
   a) the St.Helens Strategic Flood Risk Assessment;
   b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
   c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
   a) within flood zones 2 or 3; or
   b) on a site of 1 hectare or larger within flood zone 1; or
   c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
   d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
   a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
   b) any applicable Exception Test required by national policy has been passed; and
   c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):

19-22

19-22

a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;

b) protect heritage assets (such as buried archaeology);

c) be fully described in the development proposal; and

d) be funded by the developer, including long-term maintenance.

5. Any proposal for major development[56] on a site that would abut, run alongside or straddle any watercourse[57] in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.

6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):

a) an adequate soakaway or other form of infiltration system;

b) an attenuated discharge to watercourse;

19-22 19-22

56 'Major development' in this context has the same meaning as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, or any Order which amends or supersedes it. It includes, for example, proposals for 10 or more new dwellings

57 The definition of "watercourse" in this policy is the same as that in the Land Drainage Act 1991 [section 72(1)] and includes "Main Rivers" identified by the Environment Agency and also "Ordinary Watercourses"

c) an attenuated discharge to public surface water sewer;

d) an attenuated discharge to public combined sewer.

9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.

10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.

11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.

12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.

13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.

Protection of water and waste water assets

14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.

19-22 19-22

7.24 Reasoned Justification

Flood Risk

7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.

7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.

7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

Sankey Catchment Action Plan

7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.

7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, "safeguarding land from development that is required (...) for current and future flood management".

7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

Comments

19-22 19.22

Flooding from the proposed policy shown as site 8EA or policy CAS 3.2 on Parkside west the southern border is Hermitage Brook. The boundary between the borough of St Helens and the Borough of Warrington. The Hermitage Brook is the natural water drainage for the land in Newton Park the 8EA site. This brook is on a regular basis overflows its banks nearly every time it rains due to the water from Newton Park filtering naturally in to the ground the water that does not seep in to the ground flows over the land into Hermitage Brook. Three views of normal overnight rainfall and the resultant Hermitage Brook capacity:







19.22 19.22

19-22 This is without the proposed use of surface water drainage from the 8EA development. 19-22
The development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available to absorb the rainfall on Newton Park. The Roads and Roof areas will according to the Phase 1 proposed drainage scheme have drainage directed in to the Hermitage Brook to solve SHC 8EA surface water problem. SHC state there will be ponds, but the ponds to cater for the size of warehousing purported will not cope. This means the Hermitage Brook will burst its banks every time it rains just to cater for the warehouse roof and road drainage. The result will be the A49 banking will be permanently under water that will with time undermine the A49 foundations. At present the culvert under the A49 can just cope but not with the Warehousing. With the valley permanently under flood situation the flora and fauna will be affected as the roots will die due to being over watered. This SHC has not considered either in the application(s) or the St Helens Local Plan Submission Draft January 2019. The effect of flooding of Hermitage Brook is a Cross Border issue with Warrington Borough Council. This means additional wording to prevent Hermitage Brook from flooding needs to be seriously addressed as wildlife rely on the Flora and Fauna.

Also as the Hermitage Brook is the Key area as Identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the SHC side of the valley but the Warrington Borough Council side to which has not been addressed.
So not just this Policy LPC12 is flawed, the other affected policies are also flawed due to the associational link of the Hermitage Brook. These policies that are also flawed are: LPC06; LPC10; LPC11; and LPC12.

Therefore, not a platform for Local People to shape their surroundings.

PO3629

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
[redacted]

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
[redacted]
indigo.

RTPI AWARDS FOR PLANNING EXCELLENCE COMMENDED 2018
RTPI NORTH WEST AWARDS FOR PLANNING EXCELLENCE CATEGORY WINNER 2018
insider RESIDENTIAL PROPERTY AWARDS 2019 WINNER

RTPI Planning Consultancy of the Year 2017

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

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)

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Part B – Your Representation(s).

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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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: *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

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

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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.

EL0200A.1.pdf

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. 33

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.

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. 35

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.

Policy LPC02: Affordable Housing 36

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.

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

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3630

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

[redacted]

1 Attachment

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Kind regards,

Hannah

Hannah Payne | Senior Planner

[redacted]

indigo.

RTPI Planning Consultancy of the Year 2017

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

[redacted]

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St.Helens Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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

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

Signature: [redacted] **Date:** 13/03/2019

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St.Helens
Merseyside
WA10 1HP

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

PART B – YOUR REPRESENTATION

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

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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?	☐

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Please continue on a separate sheet if necessary

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indigo.

St James' Tower,
7 Charlotte Street,
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[redacted]

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St. Helens Council
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Merseyside
WA10 1HP

By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

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It is against this context that comments on each of the Local Plan policies have been made where relevant.

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We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough. 02

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Registered number: 2578663 VAT number: 449 4613 34

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indigo.

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We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence. 29

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PO3631

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to:
planningpolicy@sthelens.gov.uk
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[redacted]

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PO3632

EL01\2

HBF response to St Helens Local Plan Submission
Joanne Harding
to:
planningpolicy@sthelens.gov.uk
12/03/2019 17:26
Hide Details

[redacted]

2 Attachments

19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI
Local Plans Manager - North

HOME BUILDERS FEDERATION

[redacted]

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(1) - STRATEGIC AIMS & OBJECTIVES.
(2) - LPA05
(3) - LPA05 - PARA. 3
(4) - LPA05 - PARA 4
(5) - LPA07 - PART 3C
(6) - LPA07 - PART 9
(7) - LPC01 - PART 1
(8) - LPC01 - PART 2
(9) - LPC01 - PART 3
(10) - LPC01 - PART 4
(11) - LPC02
(12) - LPC10
(13) - LPC13
(14) - LPD07

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1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House, 27 Broadwall, London	Address:
Postcode: SE1 9PL	Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	13/03/2019

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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)	Please see separately attached letter.								

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 ☐ Please see separately attached letter.	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?	☐ Please see separately attached letter.
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 see separately attached letter.

Please continue on a separate sheet if necessary

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

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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:
To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

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

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

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

SENT BY EMAIL
planningpolicy@sthelens.gov.uk
13/12/2018

Dear Sir / Madam,

ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members.

Vision and Objectives
The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:

The HBF support the part of the vision which states that *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as s et out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.

This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable homes where there are on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

The HBF does not dispute the need for affordable housing within St Helens and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The Council will need to confirm that this policy is viable, through its evidence.

It is noted within the Viability Assessment 2019 that there are issues with the viability, for example with greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. It is noted that one site remains unviable at 35dph, with the others having very narrow margins of viability and when consideration is given to not only the 30% affordable housing requirement but also to the cumulative impacts of the polices within the Plan the situation is worse.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- *Further consideration is given to the viability of the affordable housing requirements.*

Policy LPC10: Trees and Woodland

The HBF does not consider that Policy LPC10 is sound as it is not justified for the following reasons:

This policy states that where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio. The HBF would like to know what the justification and evidence is for this ratio of replacement. It is considered that if the Council are seeking a 'net environmental' gain that this could be achieved in many other ways than seeking a 2:1 tree ratio. The HBF recommends that this part of the policy is deleted.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- *'6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required ~~on at least a 2 for 1 ratio~~, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period'.*

PO3633

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
[redacted]

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

[redacted]

indigo.

RTPI AWARDS FOR PLANNING EXCELLENCE COMMENDED 2018

RTPI NORTH WEST AWARDS FOR PLANNING EXCELLENCE CATEGORY WINNER 2018

insider RESIDENTIAL PROPERTY AWARDS 2019 WINNER

RTPI Planning Consultancy of the Year 2017

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

[redacted]

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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.

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

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

Yes ☒ (Via Email) No ☐

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

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

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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: *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

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

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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.

EL0200A.1.pdf

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. 33

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.

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. 35

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.

Policy LPC02: Affordable Housing 36

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.

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

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3634

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

lichfields.uk

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

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

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

[redacted]

1 Attachr

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

Sir / Madam

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

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

https://we.tl/t-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

16.0 # Policy LPC10: Trees and Woodland

Introduction

16.1 Policy LPAC05 seeks to ensure that new development contributes to the protection and management of Open Space in St Helens.

Consideration of Policy

16.2 TW acknowledges that need for new development to make a contribution towards the provision and protection of trees and woodland.

16.3 Part 6 requires developments to replace any lost trees at a ratio of 2 to 1. TW objects to this requirement and have undertaken a review of the evidence base and cannot find evidence to support this policy objective.

Tests of Soundness

16.4 TW considers the policy fails to meet the following tests of soundness because:

1 **It is not justified**: there is no evidence to identify the need for trees to be replaced at a ratio of 2 to 1.

Recommended Change

16.5 TW considers that to ensure the policy is sounds, the Council will be required to remove reference to the need for a 2 for 1 ratio replacement on trees lost.

PO3635

EL0258

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

SITE GBP_093_A

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

[redacted]

4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf

Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Neeeds Assessment.pdf

1 LPA05
2 LPA02
3 GBR
4 S.A.
5 S.O.4.1
6 S.O.5.1
7 LPA02 - PARA 3
8 LPA02 - PARA 4
9 LPA03
10 LPA04

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

11 LPA05 - PARA 3
12 LPA05 - PARA 4
13 APPENDIX 4
14 TABLE 4.6
15 LPA05.1
16 LPC02
17 LPC04
18 LPA07 - PARA 9, c)
19 LPA07, PARA 9
20 LPC10 - PARA 6

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

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21 LPA06
22 LPC01
23 LPC13 - PARA 4
24 LPD07
25 LPD02
26 LPD03.

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https://i.imgur.com/iHET88g.jpg

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

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

[redacted]

1 Attachment

Appendix 1- Delivery Statement.pdf

Email 2

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Associate Planner
Pegasus Group
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From: Graham Lamb
Sent: 13 March 2019 17:01
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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https://i.imgur.com/iHET88g.jpg

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

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

[redacted]

1 Attachment

Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner
Pegasus Group
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Please consider the environment before printing this email message.

From: Graham Lamb
Sent: 13 March 2019 17:01
To: planningpolicy@sthelens.gov.uk
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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KW/GL/P17-0098/L004

13 March 2019

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

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

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.

- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.

- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

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

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

Yours sincerely,

[redacted]

Graham Lamb
Associate Planner
[redacted]

Encs.

APPENDIX 4.

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th March 2019

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

Pegasus Group

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

T 0161 393 3399 | **W** www.pegasuspg.co.uk

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

> *"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".*

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, unless further justification is provided, and at the very least it should include some relaxation to allow for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and/ or other low carbon energy sources.

9.11 Whilst Redrow fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Governments Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Redrow fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations sets the appropriate standards

PO3636

SITE : FORMER LPA0 HS08

EL0289

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 1 of 4

Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

[redacted]

4 Attachments

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

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

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]
Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

1 - LPA05
2 - LPA02
3 - GBR
4 - S.A.
5 - S.O. 4.1
6 - S.O. 5.1
7 - LPA02 - PARA 3
8 - LPA02 - PARA 4
9 - LPA03
10 - LPA04
11 - LPA05 - PARA 3
12 - LPA05 - PARA 4
13 - APPENDIX 4
14 - TABLE 4.6
15 - LPA05.1
16 - LPA06
17 - LPC01
18 - LPC02
19 - LPC04
20 - LPA07 - PARA 3d
21 - LPA07 - PARA 9
22 - LPC10
23 - LPC13 - PARA 4
24 - LPD07
25 - LPD02
26 - LPD03

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 2 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:06

[redacted]

3 Attachments

Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf

Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

7 Attachments

Appendix 5-Agricultural Land Classification-Redrow.pdf

Appendix 6-Detailed Site Pro Forma-Redrow.pdf

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

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

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

Appendix 9c-Summary Supply Trajectory-Redrow.pdf

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

Email 3 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 4 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

1 Attachment

Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

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

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

[redacted]

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPC10	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 ☐	No ☐
Sound?	Yes ☐	**No x**
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?	x
Justified?	X
Effective?	X
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
DO NOT CONSIDER THAT THE 2 TO 1 TREE REPLACEMENT RATIO IS JUSTIFIED BY EVIDENCE BASE. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	**x**	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

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

Pegasus Group

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

[redacted]

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

> *"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".*

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

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9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, unless further justification is provided, and at the very least it should include some relaxation to allow for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and/ or other low carbon energy sources.

9.11 Whilst Redrow fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Governments Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need.

9.12 On this basis, we request that this requirement be removed.

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9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Redrow fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations sets the appropriate standards

PO3637

Site: Former UPO HS23 EL0290

EL0290B.1.pdf

Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

3 Attachments

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

Appendix 1-Illustrative Masterplan-Wallace.pdf

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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1. LPA05
2. LPA02
3. GBR
4. SA
5. S.O.4.1
6. S.O.5.1
7. LPA02 - PARA 3
8. LPA02 - PARA 4
9. LPA03
10. LPA04
11. LPA05 - PARA 3
12. LPA05 - PARA 4
13. APPENDIX 4
14. LPA05 - TABLE 4.6
15. LPA05.1
16. LPA06
17. LPC01
18. LPC02
19. LPC04
20. LPA07 - PARA 3c)
21. LPA07 - PARA 9
22. LPC10
23. LPC13 - PARA 4
24. LPD07
25. LPD02
26. LPD03

Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

4 Attachments

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

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

Email 2 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

1 Attachment

Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

2 Attachments

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

Email 4 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:15

[redacted]

1 Attachment

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

Email 5 of 8 of Wallace representations.

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Principal Planner

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to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:15

[redacted]

1 Attachment

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

Email 6 of 8 of Wallace representations.

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8
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planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[redacted]

7 Attachments

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

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

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

Appendix 8c-Summary Supply Trajectory-Wallace.pdf

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

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

Email 7 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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Rebecca Dennis
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planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[redacted]

1 Attachment

Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [redacted] **Date:** 13/05/2019

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St.Helens** **Merseyside** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)
or by e-mail to:	planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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	LPC10	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 ☐	No ☐
Sound?	Yes ☐	**No X**
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?	**X**
Justified?	**X**
Effective?	**X**
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

DO NOT CONSIDER THAT THE 2 TO 1 TREE REPLACEMENT RATIO IS JUSTIFIED BY EVIDENCE BASE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make

the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS. Please continue on a separate sheet if necessary

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	**X**	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

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

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

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

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

Pegasus Group

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

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Wallace's proposals.

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> *"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".*

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9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, and tree planting considered on a case by case basis taking into account site specifics, such as, for example, the need for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and / or other low carbon energy sources.

9.11 Whilst Wallace fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Government's Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need. It is up to individual house occupiers and businesses to select their energy providers. This is not a matter that can be controlled through the planning system.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Wallace fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

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9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

PO3638

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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

R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).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

On 13/03/2019 09:31, Dave Tyas wrote:

> Please find attached SHC response form and supporting Non-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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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PART A – YOUR DETAILS

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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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

Policy LOCAL 10LP verses Policy CAS 3.2; Policy PLA10 and LPSD 7EA and LPSD8EA

What this proposal justifies over the current Parkside West: Phase 1, Phase 2 and Link Road is that the traffic on the A49 Winwick Road through Newton High Street is not impacted upon to the A580/motorway M6 junction 23, the traffic on the A49 Newton Road through Winwick is not impacted upon to the motorways M6 junction 22 and M62 junction 9. The entrance to Parkside East can still be on the A579, along with Wigan Councils weight restriction on the A579 with penalties along the lines used in London congestion charge, whereby, the SRFI traffic is forced to use the Motorway M6. The A573 will not be connected will be assessed so as to prevent SRFI traffic using the site via this route. This the Local People see as a compromise between jobs as a platform to shape their surroundings.

Designated Heritage Assets

The Local People see Designated Heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The Designated Heritage Assets under threat from the Parkside West site current proposal known as Phase 1, Phase 2 and the Parkside Link Road (PLR) are as follows:

Grade II listed Buildings and monuments

St Oswald's Well
Woodhead Farm house
Woodhead Farm Barn
Newton Park Farm house
Newton Park Farm Barn

The above are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 especially with respect to their "setting", and the NPPF 2018, 16.Conserving and enhancing the historic environment. See paragraphs 184, 185, 193 and 194, due to paragraph 193 stating:

> *"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

This means any harm is not a decision factor as the NPPF states irrespective as paragraph 184 states:

> *"These assets are an irreplaceable resource, and ~~should~~ shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."*

This means that substantial harm of a designated heritage asset can have harm as the registration process has ruled harm out or else how can future generations apply. So to class a designated heritage asset with a level of harm can not overrule future generations. The only level of harm a designated heritage asset due to the registration process is of the highest level. The only level one can give a heritage asset is to the significance, this is shown in paragraph 194. The listed buildings shown above have a significance of exceptional and therefore the Setting of the Listed building becomes the important factor as detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990.

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Registered Battlefield

The Local People see that the National Planning Authority Historic England have registered the battlefield of Winwick Pass (Red Bank). This heritage asset clearly adds to the historic importance of both Winwick And Newton-le-Willows and having been recently registered on 31 January 2018. The registration advice report shows that the only objectors were St Helens Council not just as the council but as a joint developer of the former Parkside colliery. One important fact that St Helens Council and Langtree plc used in their objections to the registration planning application are the same reasoning used in the Phase 1 application and the same reasoning used in this Local Plan update; As the registration application was under a National Planning Authority then a local planning authority can not overrule the national decision, as can not a Local Plan review when the same evidence is used in all three. But the NPPF provides the solution for the Local People in paragraph 15 and paragraph 11b)i the local people can restrict the size of the development. This is a platform the Local People can shape their surroundings and accept.

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The site of the battle of Winwick Pass as shown on the Historic England Registration map. Protected by the NPPF 2018, 16.Conserving and enhancing the historic environment:

> *184.* ***Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as*** **[Registered Battlefield]** *World Heritage Sites which are internationally recognised to be of Outstanding Universal Value*[61]. ***These assets are an irreplaceable resource, and*** ~~***should***~~ ***shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations***[62].
>
> 61 Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.
>
> 62 The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, as well as to plan-making and decision-making.

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185. Plans ~~should~~ shall set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy ~~should~~ shall take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
c) the desirability of new development making a positive contribution to local character and distinctiveness; and
d) opportunities to draw on the contribution made by the historic environment to the character of a place.

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight ~~should~~ shall be given to the asset's

conservation (and the more important the asset, the greater the weight ~~should~~ shall be). **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), ~~should~~ shall require clear and convincing justification. Substantial harm to or loss of:

a) **grade II listed buildings**, or grade II registered parks or gardens, ~~should~~ **shall be exceptional**;

b) **assets of the highest significance**, notably scheduled monuments, protected wreck sites, **registered battlefields**, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, ~~should~~ **shall be wholly exceptional**[63].

Paragraph 193 states:

"*This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"

This means any harm is not a decision factor as the NPPF states irrespective as these important sites are to be totally untouched and preserved, so that the Local People can shape their surroundings not just for this but for future generations to understand and enjoy as learn (education) about the history that surrounds them. Due to the NPPF paragraph 184 stating:

i. "*These assets are an irreplaceable resource, and ~~should~~* shall *be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*"

To have in this paragraph "future generations" means this is beyond any plan-making or decision-taking period. So makes it clear that a designated Heritage Asset is irreplaceable so must be treated as such. The removal or destruction of a heritage asset does not shape the Local People's surroundings.

<u>The remaining land on Parkside West</u>

Though the years after the colliery closed in 1993, nature has taken over the agricultural land and various flora and fauna has re-populated the land and habitats.

The Local People will only approve Policy Local 10LP which replaces Policy CAS 3.2 Parts concerning Parkside west points 1 to 13 by:

Policy LOCAL 10LP

18 This policy is to ensure the right educational needs for the local people is achievable to in order that this and future generations can advance in order that they can have a healthier and better well-being life. In order to do so the Council and the Local People will and shall: 18

Only be concerned in this policy with the land as shown in plan 8EA is the area concerned in this policy which incorporates the land reserved as shown in plan 7EA
Promote Parkside West to be an educational development not a B8 development.
Establish a grant or sponsorship based system that benefits the Local People to enter the educational development to further their career prospects.
Ensure the educational development is only built on the former workings and footprint of the former colliery.
Ensure the spoil heaps are not excavated for further development(s), but to be retained as Forest using the Northern Forest scheme for funding.
Ensure the former agricultural fields closest to the A49 Winwick Road are retained as Farm Land or associated educational sports uses.
Preserve the Designated Heritage Assets as these assets are an irreplaceable resource, and shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
Newton Park Farm access: Newton Park Drive is retained as the entrance for utilities and access to and from from Newton Park Farm, with the relationship with 7EA. This could mean a road bridge, automated level crossing or similar once 7EA is in need of being developed.
Registered Battlefield: The area in shown in Historic England registration area for the battlefield of Winwick Pass. The part located in Newton Park to remain as a field where only agricultural use or a forest under the Northern Forest Scheme. Allowing access for the local people to enjoy and understand the history of the area not just for existing but future generations. 18 18
Utilise the advantage of Newton Railway station close to the site will allow students to travel to the educational development either on a daily basis or term-time basis.
Permit accommodation can be utilised by those locals whom desire to rent out lodgings to students.
Promote Newton High Street shops for relaxation and social events for the students.
Preserve the access only for the educational establishment from the existing A49 entrance with no further or future connection to the A573 Parkside Road.

LPC11
79A & 85A

7.19 Policy LPC11: Historic Environment

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Policy LPC11: Historic Environment

1. The Council will promote the conservation and enhancement of the Borough's heritage assets and their settings in a manner that is appropriate to the significance of each asset. These include designated heritage assets such as Scheduled Monuments, Registered Battlefields, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and non-designated above ground assets and areas of archaeological interest.
2. All proposals for development that may affect a heritage asset or its setting should be accompanied by an Assessment of Significance that should form part of a Design and Access Statement and / or a Heritage Impact Assessment and clearly set out the significance of the heritage asset including any contribution made by its setting. The proposals should demonstrate how they respond to the significance of the asset. Merseyside Historic Environment Record (HER) should be consulted as a minimum.

Development affecting heritage assets

3. Development proposals that would lead to substantial harm to (or total loss of significance of) a designated heritage asset will be refused permission unless it can be demonstrated that:
   a) the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or total loss; or
   b) all the other exceptions set out in paragraph 195 of the National Planning Policy Framework (or any successor national policy that supersedes this paragraph) apply.
4. Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use.
5. Development involving harm to or loss of any non-designated heritage asset (such as any building identified on a Local List prepared by the Council) will be refused unless any public benefit from the development would outweigh such harm or loss.
6. Development and other works will be required to preserve or enhance the appearance, character and setting of all heritage assets (whether designated or not) by using good design and appropriate materials, detailing, scale, massing, siting, layout and landscaping.

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7. Where the complete or partial loss of any heritage asset is justified, the asset's significance must be recorded to a standard agreed by the Council and made publicly available.

Areas of archaeological interest

8. Any development proposal that may affect one or more asset(s) of archaeological interest (whether designated or not) must include an appropriate desk-based assessment and where necessary a field evaluation, carried out by a suitably qualified person(s). Such evidence should identify any likely features of archaeological interest within or close to the site and how these would be affected by the proposal.

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9. Development proposals affecting archaeological remains may be required (depending on the significance of the remains) to preserve the remains in situ or to secure the appropriate excavation and recording of the significance of the remains by a suitably qualified person.

Other implementation measures

10. The Council will:

a) prepare, update and promote the implementation of Heritage Asset Appraisals and Management Plans and give appropriate weight to these in development control decisions;

b) work with partner organisations to interpret and educate the public about the heritage of the Borough;

c) take appropriate measures to improve public access to heritage assets; and

d) seek to secure the effective conservation and use of all heritage assets that are 'at Risk' within the Borough.

7.20 Policy LPC11: Strategic Aims, Objectives and Key Delivery Mechanisms

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Strategic Aims Met	SA 6
Strategic Objectives Met	SO 6.2
Is this a 'strategic' or 'local' policy?	Strategic
Key Delivery Mechanisms	• Development management process • Maintaining employment land supply • Facilitating housing delivery • Partnership working to secure conservation, recording and interpretation of heritage assets

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7.21 Reasoned Justification

7.21.1 St.Helens Borough has a unique heritage, based upon its history connected with the railways, mining, glass and other industries. The Local Plan has a key role in improving the appearance and character of the built environment, and ensuring that it can be used in a way that adapts to changing social, economic and environmental requirements. Policy LPC11 sets out how the Council will seek to conserve the Borough's historic environment and promote awareness of its shared heritage.

7.21.2 National planning policy requires the Local Plan to set out a positive strategy for the conservation and enjoyment of the historic environment, and that planning applications should describe the significance of any heritage assets affected, including any contribution made by their setting. Development that would cause substantial harm to a designated heritage asset must be refused unless such harm would be necessary to achieve substantial public benefits or other very specific circumstances set out in national policy apply. Designated heritage assets in St.Helens Borough include those set out in paragraph 1 of Policy LPC11.

Listed Buildings

7.21.3 The Borough of St.Helens contains 148 Listed Buildings. Whilst Earlestown railway viaduct is the only Grade I structure, the Borough has 12 Grade II* structures including Scholes Hall and the Statue of Queen Victoria in Victoria Square. The Council has a statutory duty to ensure the preservation of buildings listed under Part 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest. Buildings and structures within the curtilage of listed buildings are also protected under the Act.

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7.21.4 There are tight planning controls over development involving the alteration or loss of a listed building or land in its curtilage. Most new development affecting the exterior of a listed building or within the curtilage of a listed building requires planning consent. Works affecting the interior or exterior of a listed building, curtilage building or structure, normally require listed building consent. A comprehensive description and list of all listed buildings and other nationally designated heritage assets is set out on Historic England's website[54]. [54] https://historicengland.org.uk

Scheduled Monuments

7.21.5 A scheduled ancient monument is defined by the Ancient Monuments and Archaeological Areas Act 1979 as any structure, or site of a structure, above or

below ground that is considered by the Secretary of State to be of public interest by reason of its historic, architectural, traditional, artistic or archaeological importance. An application must be made to Historic England for any proposed works affecting a scheduled monument, in addition to any need for planning permission. All scheduled monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance, will be given the strictest protection. Development proposals that would result in substantial harm to or total loss of significance of any scheduled monument, or any associated feature contributing to their significance including their setting, will be refused except in wholly exceptional circumstances. Historic England's Heritage List for England identifies 12 Scheduled Monuments in the Borough, four of which are on their 'at risk' list.

Registered Battlefield – Battle of Winwick

7.21.6 The Battle of Winwick (also known as Battle of Red Bank) took place in 1648 and has been identified as being an important component of Oliver Cromwell's victory in Lancashire, which ended the Second English Civil War. The site of the battle has been designated as a registered battlefield by Historic England, recognising its significance as a turning point at this key moment in British history, and reflecting the military tactics of the time and comprising a likely final resting place for those that died during the battle. The battlefield is subject to the strong protection given to designated heritage assets set out in national policy and paragraph 3 of Policy LPC11.

Registered Parks and Gardens

7.21.7 Parks and gardens of national historic importance are designated as Registered Parks and Gardens and included in a register maintained by Historic England. There are currently two Registered Parks and Gardens in the Borough at Taylor Park (which was part of the former Eccleston Estate) and St.Helens Cemetery in Windle.

7.21.8 New development must promote the enjoyment, landscape character and interest of these areas by respecting their layout, design, character, appearance and setting. It should also avoid causing harm to key views from or towards these landscapes or prejudicing their future restoration.

Conservation Areas

7.21.9 The Planning (Listed Building and Conservation Areas) Act 1990 places statutory duties on Local Planning Authorities relating to the designation and ongoing review of Conservation Areas and adoption of policies to ensure their conservation and enhancement. There are currently eight Conservation Areas in St.Helens Borough. Proposals for development affecting a Conservation Area should preserve or enhance those elements that have been identified as making a

54 https://historicengland.org.uk

positive contribution to the character and special architectural or historic interest of the area. These elements may include buildings, boundary features, other structures, landscape features, open spaces and the setting. Where proposals would lead to harm to a Conservation Area, then the harm will be identified as being either substantial or less than substantial based on the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole. Development causing such harm will be subject to the tests set out in Policy LPC11 and national policy.

Non-designated buildings and other structures

7.21.10 The Borough contains a number of buildings and other structures that are not formally designated as heritage assets, but that nevertheless contribute to the character of the area. Policy LPC11 confirms that development that would cause harm to or loss of non-designated assets will be refused unless any public benefit from the development would outweigh such harm or loss. Development proposals that are likely to affect one or more non-designated assets will be required to include the evidence referred to in paragraph 2 of Policy LPC11.

Archaeological sites

7.21.11 Due to the long and complex history of the area, some sites (in addition to those affected by the formally designated Battlefield and Scheduled Monuments referred to earlier) are likely to contain remains of archaeological interest. Where a development would be likely to affect any site with potential to include archaeological interest (whether the site is formally designated or not), the Council will require the submission of an appropriate desk-based assessment and, where necessary, a field evaluation, demonstrating the level of such interest and how it would be affected. Planning conditions and / or agreements will be used as necessary to secure the appropriate preservation and / or recording of any remains, with the preferred solution depending upon the degree of significance of the asset.

Design of development affecting heritage assets

7.21.12 Particular attention must be paid to the design of any works affecting a heritage asset. For example on Listed Buildings and buildings in a Conservation Area, particular attention must be paid to the design and materials used in the walls, roof, doors and other detailing. The design of any windows must be carefully assessed, having regard to the importance of the building, the character and appearance of the area, the details of any opening mechanism, the appearance of 'joints' and the design of glazing bars and horns.

Historic environment records and the interpretation of heritage assets

7.21.13 The Merseyside Historic Environment Record[55] is the central heritage asset database for the Liverpool City Region and should be consulted by developers when designing their proposals.

[55] managed by Merseyside Environmental Advisory Service

7.21.14 St.Helens Council has a strong record of working with partner organisations to engage communities in their local heritage and further the understanding of the development of St.Helens as a town of the industrial revolution. Key partners in this context include Community Archaeology, the Museum of Liverpool, Merseyside Archaeological Society, Merseyside Industrial Heritage Society, Sankey Canal Restoration Society, St.Helens History Society and developers. It will continue to work with these bodies in this regard.

Comments

(highlighted text in 7.21.6 above to emphasise reasoning)

Designated Heritage Assets

The Local People see Designated Heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The Designated Heritage Assets under threat from the Parkside West site current proposal known as Phase 1, Phase 2 and the Parkside Link Road (PLR) in order to comply with Policy LOCAL 10LP are as follows:

Grade II listed Buildings and monuments
St Oswald's Well
Woodhead Farm house
Woodhead Farm Barn
Newton Park Farm house
Newton Park Farm Barn

18

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The above are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 especially with respect to their "setting", and the NPPF 2018, 16.Conserving and enhancing the historic environment. See paragraphs 184, 185, 193 and 194, due to paragraph 193 stating:

> "*This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"

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This means that substantial harm of a designated heritage asset can have harm as the registration process has ruled harm out or else how can future generations apply. So to class a designated heritage asset with a level of harm can not overrule future generations. The only level of harm a designated heritage asset due to the registration process is of the highest level. The only level one can give a heritage asset is to the significance, this is shown in paragraph 194. The listed buildings shown above have a significance of exceptional and therefore the Setting of the Listed building becomes the important factor as detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990.

Registered Battlefield

The Local People see that the National Planning Authority Historic England have registered the battlefield of Winwick Pass (Red Bank). This heritage asset clearly adds to the historic importance of both Winwick And Newton-le-Willows and having been recently registered on 31 January 2018. The registration advice report shows that the only objectors were St Helens Council not just as the council but as a joint developer of the former Parkside colliery. One important fact that St Helens Council and Langtree plc used in their objections to the registration planning application are the same reasoning used in the Phase 1 application and the same reasoning used in this Local Plan update; As the registration application was under a National Planning Authority then a local planning authority can not overrule the national decision, as can not a Local Plan review when the same evidence is used in all three. But the NPPF provides the solution for the Local People in paragraph 15 and paragraph 11b)i the local people can restrict the size of the development. This is a platform the Local People can shape their surroundings and accept.

18

18

The site of the battle of Winwick Pass as shown on the Historic England Registration map. Protected by the NPPF 2018, 16.Conserving and enhancing the historic environment: (following text in bold to emphasise the importance and the strikethrough and underlined text denotes change of tense from should to shall)

18

184. ***Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as*** **[Registered Battlefield]** *World Heritage Sites which are internationally recognised to be of Outstanding Universal Value*[61]. ***These assets are an irreplaceable resource, and*** ~~*should*~~ ***shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations***[62].

18

61 Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.

62 The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, as well as to plan-making and decision-making.

185. Plans ~~should~~ shall set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy ~~should~~ shall take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
c) the desirability of new development making a positive contribution to local character and distinctiveness; and
d) opportunities to draw on the contribution made by the historic environment to the character of a place.

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight ~~should~~ shall be given to the asset's conservation (and the more important the asset, the greater the weight ~~should~~ shall be). **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance**.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), ~~should~~ shall require clear and convincing justification. Substantial harm to or loss of:

a) **grade II listed buildings**, or grade II registered parks or gardens, ~~should~~ **shall be exceptional**;
b) **assets of the highest significance**, notably scheduled monuments, protected wreck sites, **registered battlefields**, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, ~~should~~ **shall be wholly exceptional**[63].

Justification

Paragraph 193 states:

18

> *"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

18

This means any harm is not a decision factor as the NPPF states irrespective as these important sites are to be totally untouched and preserved, so that the Local People can

shape their surroundings not just for this but for future generations to understand and enjoy as learn (education) about the history that surrounds them. Due to the NPPF paragraph 184 stating: (The strikethrough and underlined text denotes change of tense from should to shall)

18

> b) "*These assets are an irreplaceable resource, and ~~should~~* shall *be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*"

18

To have in this paragraph "future generations" means this is beyond any plan-making or decision-taking period. So makes it clear that a designated Heritage Asset is irreplaceable so must be treated as such. The removal or destruction of a heritage asset does not shape the Local People's surroundings.

Conclusions

The policy LPC11 needs paragraph 3 to be removed and all of the comments above needs to be incorporated. This complies with Policy LOCAL 10LP

Also in Green Belt GB_041 the following statement will be struck out (removed) due to new information:

> *"Whilst part of parcel GBP_041 has recently been designated as a Historic Battlefield (Battle of Winwick (Red Bank)) this is not considered to be an over-riding constraint and Historic England has not raised any objections in principle to the phase one planning application referred to above."*

PO3639

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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

(For official use only)

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Mr.	Title:
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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

19-22 Policies LPC10, LPC12, LPC06, LPC11 Sites 7EA & 8EA

7.22 Policy LPC12: Flood Risk and Water Management

Policy LPC12: Flood Risk and Water Management

Flood Risk

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
   a) the St.Helens Strategic Flood Risk Assessment;
   b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
   c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
   a) within flood zones 2 or 3; or
   b) on a site of 1 hectare or larger within flood zone 1; or
   c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
   d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
   a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
   b) any applicable Exception Test required by national policy has been passed; and
   c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):

19-22

19-22

a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;

b) protect heritage assets (such as buried archaeology);

c) be fully described in the development proposal; and

d) be funded by the developer, including long-term maintenance.

5. Any proposal for major development[56] on a site that would abut, run alongside or straddle any watercourse[57] in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.

6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):

a) an adequate soakaway or other form of infiltration system;

b) an attenuated discharge to watercourse;

19-22 19-22

56 'Major development' in this context has the same meaning as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, or any Order which amends or supersedes it. It includes, for example, proposals for 10 or more new dwellings

57 The definition of "watercourse" in this policy is the same as that in the Land Drainage Act 1991 [section 72(1)] and includes "Main Rivers" identified by the Environment Agency and also "Ordinary Watercourses"

c) an attenuated discharge to public surface water sewer;

d) an attenuated discharge to public combined sewer.

9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.

10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.

11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.

12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.

13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.

Protection of water and waste water assets

14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.

19-22 19-22

7.24 Reasoned Justification

Flood Risk

7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.

7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.

7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

Sankey Catchment Action Plan

7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.

7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, "safeguarding land from development that is required (...) for current and future flood management".

7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

Comments

19-22 19.22

Flooding from the proposed policy shown as site 8EA or policy CAS 3.2 on Parkside west the southern border is Hermitage Brook. The boundary between the borough of St Helens and the Borough of Warrington. The Hermitage Brook is the natural water drainage for the land in Newton Park the 8EA site. This brook is on a regular basis overflows its banks nearly every time it rains due to the water from Newton Park filtering naturally in to the ground the water that does not seep in to the ground flows over the land into Hermitage Brook. Three views of normal overnight rainfall and the resultant Hermitage Brook capacity:







19.22 19.22

19-22 This is without the proposed use of surface water drainage from the 8EA development. 19-22
The development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available to absorb the rainfall on Newton Park. The Roads and Roof areas will according to the Phase 1 proposed drainage scheme have drainage directed in to the Hermitage Brook to solve SHC 8EA surface water problem. SHC state there will be ponds, but the ponds to cater for the size of warehousing purported will not cope. This means the Hermitage Brook will burst its banks every time it rains just to cater for the warehouse roof and road drainage. The result will be the A49 banking will be permanently under water that will with time undermine the A49 foundations. At present the culvert under the A49 can just cope but not with the Warehousing. With the valley permanently under flood situation the flora and fauna will be affected as the roots will die due to being over watered. This SHC has not considered either in the application(s) or the St Helens Local Plan Submission Draft January 2019. The effect of flooding of Hermitage Brook is a Cross Border issue with Warrington Borough Council. This means additional wording to prevent Hermitage Brook from flooding needs to be seriously addressed as wildlife rely on the Flora and Fauna.

Also as the Hermitage Brook is the Key area as Identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the SHC side of the valley but the Warrington Borough Council side to which has not been addressed.
So not just this Policy LPC12 is flawed, the other affected policies are also flawed due to the associational link of the Hermitage Brook. These policies that are also flawed are: LPC06; LPC10; LPC11; and LPC12.

Therefore, not a platform for Local People to shape their surroundings.

PO3640

E10268

RE: St Helens Borough Council
Howard, Sarah
to:
planningpolicy@sthelens.gov.uk
09/04/2019 10:13

[redacted]

1 Attachment

G_HERef_PL00536899_340195_.pdf

Dear Kerri,

Please find attached Historic England's response to the consultation. Apologies for the delay getting this to you, we have been short staffed in our business support team and it would appear that the email was not sent.

All the best,
Sarah

Sarah Howard
Inspector of Ancient Monuments
Historic England, National Planning and Conservation Department
North West Office, Canada House, Chepstow Street, Manchester M1 5FW
North East Office, Bessie Surtees House, 41-44 Sandhill, Newcastle upon Tyne, NE1 3JF
[redacted]

www.HistoricEngland.org.uk |@HistoricEngland |@HE_NorthWest|@HE_NorthEast

Celebrating 20 years of our Heritage at Risk campaign! Read about some of the best rescues since 1998 and the latest stories from our 2018 North West Register.

From: Kerri Farnsworth [redacted]
Sent: 08 April 2019 16:55
To: Creaser, Karl
Subject: St Helens Borough Council -

Hello Karl

I'm part of a consultant team retained by St Helens Borough Council at the moment to look at preparing a strategic heritage plan for them, looking at assets + engagement + activities.

I am aware that you were the HE case officer for responses to the Local Plan drafts & proposals, so my first question is as to whether HE will be responding to the current extended St Helens Local Plan consultation? The original deadline for responses was 31 March, and officers have advised that they have no record of having received a response from HE, but this consultation period has since been extended - we were advised initially for a period of 8 weeks, but I believe the final date was to be confirmed as there are implications of the timing of local elections around that time too.

Secondly, we are keen to advise St Helens to look into the pending new HE Historic High Streets programme, and wondered if you knew the timetable for its launch and/or further information being available? It just says 'spring 2019' on the website at the moment. If detailed information is going to be come available imminently we would include clear guidance re: a strategic approach for the Borough in our final report.

Many thanks,
Kerri Farnsworth
Managing Director, 360^0 Cityshapers / Kerri Farnsworth Associates

Board Member, International Urban Development Association (INTA)
Fellow, Royal Society for the Arts (FRSA)
Head Judge, European City of the Year Award
Royal Institute of British Architects (RIBA), Design Review Panel
Academy of Urbanism, Academician and Place Partner
Board Member, In Place Of War
Editorial Board, ThinkHouse

[redacted]



Historic England

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Historic England

NORTH WEST OFFICE

EL0268

[redacted]

St Helens Council
St Helens Town Hall
Victoria Square
St Helens
WA10 1HP

[redacted]

Our ref: PL00536899

11 March 2019

Dear [redacted]

I can see that you have addressed comments made by Historic England on the previous draft of the St. Helens Local Plan in a letter from my colleague Darren Ratcliffe dated 20th January 2017 (Ref no. PL0014549) through improvements to the policy relating to the historic environment (LPC11) as well as other policies that could potentially impact upon heritage assets. As such, we have no further comments to make regarding the January 2019 draft.

Yours sincerely,

[redacted]

Sarah Howard
Inspector of Ancient Monuments

[redacted]

(1) LPC11

Support

SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW
Telephone 0161 242 1416
HistoricEngland.org.uk

Positive about disabled people

Stonewall DIVERSITY CHAMPION

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

PO3641

Representor Details

Web Reference Number	WF0472
Type of Submission	Web submission
Full Name	Mr Simon Marsh
Organisation	Battlefields Trust
Address	Kemp House, 152 City Road, London, EC1V 2NX HP27 0HS
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	LPC 11: Historic Environment
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

5. If you consider the Local Plan is unsound, it because it is not:
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 am responding to the consultation on the St Helens Local Plan on behalf of the Battlefields Trust, a national charity dedicated to the preservation, research and presentation of battlefields as historical and educational resources (see www.battlefieldstrust.com)
I am responding specifically to policy LPC11: Historic Environment and offer the following comments.
A. The policy covers the requirement in para 189 of the National Planning Policy Framework (NPPF) for a developer to provide a statement of significance relating to a heritage asset threatened by development, but appears silent on the provisions in para 190, which require local authorities to identify and assess the significance of a heritage asset based on available evidence. In the Trust's view this should be included to make clear that significance will be independently assessed by the Council rather than relying on the developers assessment.
B. The policy should also be clear that for designated heritage assets, great weight should be placed on their conservation as outlined by para 193 of the NPPF. This should be the starting point for any consideration of less than substantial harm assessments. The draft policy seems to water this down.
C. Para 3 of the draft policy relating to substantial harm also appears to dilute the NPPF statement than such harm should be wholly exceptional. In the Trust's view the NPPF language should be reflected in this section of the policy.
D. There is an inconsistency between paras 4 and 5 of the draft policy. Para 4 relating to designated assets links public benefits to optimum viable use, whereas para 5 relating to non-designated assets makes no such linkage. This seems to be the wrong way around as optimum viable use criteria could

be used to push through a planning application relating to a designated asset on public benefit grounds whereas it could not be similarly applied to a non-designated asset as the policy currently stands. As drafted this provision seems designed to make it easier for the Council's planning committee to agree applications which harm designated assets. This seems to the Trust to be contrary to the spirit of NPPF para 193.

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

Explicitly use the language of the National Planning Policy Framework and ensure all elements are covered.

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	2/19/2019 10:52:58 PM

PO3642

EL0075

Sh Helens Borough Local Plan; Submission Draft Consultation;
Stephen Robson
to:
planningpolicy
12/03/2019 10:04

[redacted]

1 Attachment

LGT letter SHBC 12.03.2019.pdf

Please see attached Lancashire Gardens Trust comments in this consultation.

Regards

Stephen Robson
For LGT

(1) - LPC11-Criterion 1
(2) - LPC11-Criterion 5
(3) - Para 7.21.7
(4) - Para 7.21.10
(5) - Policies Map

[redacted]



Lancashire Gardens Trust
Conservation & Planning Group

12 March 2019

St Helens Council
Wesley House
Corporation Street
St Helens
WA10 1HF

By email only to planningpolicy@sthelens.gov.uk

Dear Sir

St Helens Borough Local Plan 2020-2035, Submission Draft January 2019; GT Reference E18/1474

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the above emerging planning policy. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered historic designed landscapes, and is authorised by the GT to respond on GT's behalf in respect of such consultations.

Our comments refer in the main to Policy LPC11 Historic Environment:
LGT supports the comprehensive approach to protection and policies as set out under Historic Environment.
Paragraph 1
In particular LGT welcomes the inclusion and specific reference to 'non-designated above ground assets' in paragraph 1 of LPC11. (1)
Paragraph 5
The reference to local lists is welcomed and we would suggest that the word 'and sites' should be added to the text in addition to 'buildings'. Although there may not at present be a local list for historic designed landscapes, it is hoped that in time this may be addressed. (2)
Clause 7.21.7
Registered Parks and Gardens
There are actually three RPGs in St Helens Borough. The recently (2013) listed RPG at the 'Landscape Associated with the Former Pilkington Headquarters Complex' requires to be named in addition to the two sites already identified. We note however, that this RPG appears to be correctly indicated on the Policies Map South Plan. (3)
Clause 7.21.10
Non-designated buildings and other structures
Again, although there may not at present be a local list for historic designed landscapes, (4)

Registered company No 7097219 Registered Charity No 1164494; Moss Lane House, Green Lane, Chipping, Preston, PR3 2TQ

[redacted]

it is hoped that in time this may be addressed. We suggest that the title is extended to cover 'and sites', to be consistent with LPC11/6. (4)

Policies Map North Plan

Borough Cemetery, Windleshaw is shown as RPG but the north boundary is indicating a slightly smaller area of listing than the actual boundary currently indicated on HE website. This needs correcting. (5)

We trust that these comments will be taken as constructive and will be accommodated into the final adopted Local Plan policies.

[redacted]

Yours faithfully

[redacted]

S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI
Chair, Conservation & Planning Group

Registered company No 7097219 Registered Charity No 1164494; Moss Lane House, Green Lane, Chipping, Preston, PR3 2TQ

PO3643

EL0075

Sh Helens Borough Local Plan; Submission Draft Consultation;
Stephen Robson
to:
planningpolicy
12/03/2019 10:04

[redacted]

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PO3644

EL0075

Sh Helens Borough Local Plan; Submission Draft Consultation;
Stephen Robson
to:
planningpolicy
12/03/2019 10:04

[redacted]

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PO3645

EL0075

Sh Helens Borough Local Plan; Submission Draft Consultation;
Stephen Robson
to:
planningpolicy
12/03/2019 10:04

[redacted]

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Conservation & Planning Group

12 March 2019

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Wesley House
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WA10 1HF

By email only to planningpolicy@sthelens.gov.uk

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Chair, Conservation & Planning Group

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PO3646

(1) - LPA09

{In Archive} RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft (2) - LPB01

Tim Bettany-Simmons (3) - LPC11

to:

planningpolicy@sthelens.gov.uk

04/02/2019 11:09

[redacted]

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]

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)

"This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed. It may contain privileged information. Any unauthorised review, use, disclosure, distribution or publication is prohibited. If you have received this e-mail in error please contact the sender by reply e-mail and destroy and delete the message and all copies from your computer. "

Keep in touch
Sign up for the Canal & River Trust e-newsletter https://canalrivertrust.org.uk/newsletter
Become a fan on https://www.facebook.com/canalrivertrust
Follow us on https://twitter.com/canalrivertrust and https://www.instagram.com/canalrivertrust

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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 reidrwydd 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.

PO3647

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
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

EF0059

01-25

Re: PAG Response to Local Plan Draft Submission

[redacted]

to:
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]

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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-Techincal 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.

EF0059 / 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 Postcode: WA2 8SJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signatu [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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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 Postcode: WA2 8SJ	Address: 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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No X
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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 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, LPA04.1, LPC09, LPC10, LPA02, LPC11, LPC12, LPC06, LPD09, [redacted].
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

19-22 Policies LPC10, LPC12, LPC06, LPC11 Sites 7EA & 8EA

7.22 Policy LPC12: Flood Risk and Water Management

Policy LPC12: Flood Risk and Water Management

Flood Risk

1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:
   a) the St.Helens Strategic Flood Risk Assessment;
   b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and
   c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.
2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:
   a) within flood zones 2 or 3; or
   b) on a site of 1 hectare or larger within flood zone 1; or
   c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or
   d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.
3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:
   a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;
   b) any applicable Exception Test required by national policy has been passed; and
   c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.
4. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):

19-22

19-22

a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;

b) protect heritage assets (such as buried archaeology);

c) be fully described in the development proposal; and

d) be funded by the developer, including long-term maintenance.

5. Any proposal for major development[56] on a site that would abut, run alongside or straddle any watercourse[57] in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.

6. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.

Water Quality

7. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment will be protected during the construction process.

Sustainable Drainage Systems

8. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):

a) an adequate soakaway or other form of infiltration system;

b) an attenuated discharge to watercourse;

19-22 19-22

56 'Major development' in this context has the same meaning as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, or any Order which amends or supersedes it. It includes, for example, proposals for 10 or more new dwellings

57 The definition of "watercourse" in this policy is the same as that in the Land Drainage Act 1991 [section 72(1)] and includes "Main Rivers" identified by the Environment Agency and also "Ordinary Watercourses"

c) an attenuated discharge to public surface water sewer;

d) an attenuated discharge to public combined sewer.

9. Surface water management infrastructure within new developments should, where feasible, include above ground features designed to deliver benefits to biodiversity and / or landscape.

10. Discharge of surface water to a public sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period.

11. If a development on a green-field site would discharge to a public sewer, the rates of proposed discharge (peak flow and overall volume) from the development should not exceed the existing green-field run-off rates. If a development on a previously developed site would discharge to a public sewer, the discharge rates (peak flow and overall volume) must be as close as reasonably practicable to those that would apply if the site were a green-field site. As a guideline, a reduction of at least 30% may be sought, rising to at least 50% in Critical Drainage Areas or in areas identified as having an intermediate or high risk of surface water flooding. Storm water storage capacity should normally include an allowance of 40% to address the likely future effects of climate change.

12. Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.

13. Applicants for planning permission should have regard to the St.Helens Council Sustainable Drainage Systems Guidance.

Protection of water and waste water assets

14. Development that would compromise the physical integrity or the effective maintenance of any water or waste water infrastructure asset will not be permitted.

19-22 19-22

7.24 Reasoned Justification

Flood Risk

7.24.1 Flood risk has potential impacts on public safety, human health, social and economic wellbeing and the environment. Policy LPC12 aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St.Helens Strategic Flood Risk Assessment.

7.24.2 The policy seeks to ensure that where development is necessary in high or medium flood risk areas that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk elsewhere. Key terms within the policy (for example flood risk zones 1, 2 and 3, and Critical Drainage Areas) are explained in the glossary and in National Planning Practice Guidance.

7.24.3 The vast majority of the Borough lies within the catchment of the River Mersey and the River Sankey sub catchment. The remainder is located within the Alt Catchment.

Sankey Catchment Action Plan

7.24.4 Sankey Brook is the primary watercourse draining St.Helens Borough running from the central low-lying landscape of the Borough before heading east and then south into the River Mersey at Sankey Bridges in Warrington. The central area of the Borough is drained by a radial pattern of tributaries including Black Brook draining the north and running west of Billinge Hill; Rainford Brook and Windle Brook to the northwest and west respectively, and Sutton Brook to the south draining Rainhill. Some areas of the Borough are at significant risk of surface water flooding.

7.24.9 In addition, due to the volumes to be attenuated, the Council has identified two Flood Water Storage Safeguarding Areas on the Policies Map. These are areas that will be safeguarded for the future development of significant flood storage facilities, in accordance with and to complement other measures set out in the Sankey Catchment Action Plan. This approach also accords with the advice in paragraph 157 of the NPPF that Local Plans should manage flood risk by, inter alia, "safeguarding land from development that is required (...) for current and future flood management".

7.24.10 As the Lead Local Flood Authority (LLFA), the Council, working with the Environment Agency and the wider Sankey Catchment Partnership, may identify additional areas for flood water storage through the Local Flood Risk Strategy. If so, these additional areas may be safeguarded for this use as part of a review of the Local Plan.

Comments

19-22 19.22

Flooding from the proposed policy shown as site 8EA or policy CAS 3.2 on Parkside west the southern border is Hermitage Brook. The boundary between the borough of St Helens and the Borough of Warrington. The Hermitage Brook is the natural water drainage for the land in Newton Park the 8EA site. This brook is on a regular basis overflows its banks nearly every time it rains due to the water from Newton Park filtering naturally in to the ground the water that does not seep in to the ground flows over the land into Hermitage Brook. Three views of normal overnight rainfall and the resultant Hermitage Brook capacity:







19.22 19.22

19-22 This is without the proposed use of surface water drainage from the 8EA development. 19-22
The development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available to absorb the rainfall on Newton Park. The Roads and Roof areas will according to the Phase 1 proposed drainage scheme have drainage directed in to the Hermitage Brook to solve SHC 8EA surface water problem. SHC state there will be ponds, but the ponds to cater for the size of warehousing purported will not cope. This means the Hermitage Brook will burst its banks every time it rains just to cater for the warehouse roof and road drainage. The result will be the A49 banking will be permanently under water that will with time undermine the A49 foundations. At present the culvert under the A49 can just cope but not with the Warehousing. With the valley permanently under flood situation the flora and fauna will be affected as the roots will die due to being over watered. This SHC has not considered either in the application(s) or the St Helens Local Plan Submission Draft January 2019. The effect of flooding of Hermitage Brook is a Cross Border issue with Warrington Borough Council. This means additional wording to prevent Hermitage Brook from flooding needs to be seriously addressed as wildlife rely on the Flora and Fauna.

Also as the Hermitage Brook is the Key area as Identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the SHC side of the valley but the Warrington Borough Council side to which has not been addressed.
So not just this Policy LPC12 is flawed, the other affected policies are also flawed due to the associational link of the Hermitage Brook. These policies that are also flawed are: LPC06; LPC10; LPC11; and LPC12.

Therefore, not a platform for Local People to shape their surroundings.

PO3648

EL0073
(1) - LPC12
(2) - GEN
(3) - LPD02
(4) - LPA04.1
(5) - LPA05.1
(6) - LPD05
(7) - LPC12
(8) - LPD01

St Helens - Submission Draft
Jones, Robin@Manchester
to: [redacted]

1 Attachment

St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,
Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd
10th Floor | One St Peters Square | Manchester | M2 3DE
[redacted]

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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

[redacted]

Date 12th March 2019

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

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

environmental drivers. United Utilities requests support for any consequential investment which will be necessary as a result of the growth identified by this draft plan and by any associated development plans. It is therefore requested that local policy is worded to recognise that utility sites, located within the green belt, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.

United Utilities requests the Council's support for future investment in infrastructure in order to be able to expediently respond to the needs of St Helens. With regards to those sites situated in the Green Belt, national policy within the NPPF allows for:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and

- limited infilling or the partial or complete redevelopment of previously-developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.

On this basis, we are of the opinion that National Policy is broadly supportive of the expansion of our key operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies, and reflected on your proposals map. We recommend a policy based on the following wording.

'Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.'

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of future development can be achieved. OS location plans of our sites for this purpose have been sent as part of previous consultations. The sites are listed below

Public Water Supply

Groundwater Source Protection Zones (SPZ)

UU acknowledge the reference to groundwater protection within Policy LPD01: Ensuring Quality Development and LPC12: Flood Risk and Water Management. However, owing to the presence of large areas of groundwater protection zones within the borough, UU consider that the Council should give further consideration to SPZs. To address this, UU's preference would be to have a standalone Ground Water Protection Policy in the Local Plan. This is also an important policy consideration in relation to any windfall sites that may take place in SPZ 1 or 2, as it may be necessary for the applicant to submit evidence of a risk assessment and mitigation as part of their application.

As has been raised in previous consultations, the SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The prevention of pollution to drinking water supplies is critical.

With respect to the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from locations which are identified as sensitive Groundwater protection areas especially Groundwater Source Protection Zone 1 (SPZ1). This is of particular relevance given the presence of SPZ's in the Authority area.

Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

UU understand that the two previously allocated sites located within SPZ1 (listed below), are now identified as safeguarded land.

- Former Eccleston Park Golf Club; and
- Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows

United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. Therefore, UU's preference would be for the boundaries of the allocations to be amended to remove any land identified for development within SPZ1.

(7)

Additionally, it is worth highlighting that there are a number of sites (listed below) located within SPZ 2:

- Land between Vista Road and Belvedere Road, Earlestown
- Former Eccleston Park Golf Club
- Land East of Newlands Grange (former Vulcan works) and west of West Coast mainline, Newton
- Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows
- Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line
- Land to the east of M6 Junction 23, Haydock
- Parkside West, Newton-le-Willows

Below is UU's Policy wording suggestion in relation to Ground Water Protection Policy in the Local Plan:

'Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'The Environment Agency's approach to groundwater protection', or any subsequent iteration of the guidance.

New development within Groundwater Source Protection Zones will be expected to conform to the following:

MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.

RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

Within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided.'

(7)

Health and Wellbeing

In regards to health, well-being and maximising the quality of residential amenity, UU wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour. In this regard, UU supports clause cof Policy LPD01: Ensuring Quality Development. Furthermore, UU are pleased to see that the sites identified within the Draft Submission are located away from our wastewater treatment works.

We feel it is important to re-emphasise that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure. A wastewater treatment works can result in emissions which include odour and noise. Therefore, if you are considering any sites for new allocations, especially housing allocations, near to wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing such sites with potential alternative sites that may be available to you for allocation. The position of United Utilities is that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works.

(8)

Our wastewater treatment works in your borough include:

- St Helens WwTW
- Prescott WwTW
- Billinge WwTW
- Billinge South WwTW

Note that Lingley Mere WwTW is located within Warrington's authority boundary, but directly bounds St Helens.

PO3649

St Helens Local Plan 2020 - 2035, Submission Draft - Representations
Dan Ingram
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:20

[redacted]

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
[redacted]

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 WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

[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 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)

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

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

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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.

EL0192A.2.pdf

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

PART B – YOUR REPRESENTATION

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No ☐
Sound?	Yes ☐	No ☐
Complies with the Duty to Cooperate	Yes ☐	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

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

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

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

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

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER SITES.

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

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

Marnel Park Development Strategy.pdf
EL0192

St Helens Borough Local Plan 2020 - 2035
Submission Draft

Representations on behalf of Miller Homes

March 2019

[redacted]

BARTON WILLMORE

Marnel Park Development Strategy.pdf
EL0192

requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development, the Policy provides a mechanism for mitigation and/or compensation as appropriate.

9.36 Our Client is broadly supportive of this Policy, recognising that in allocating site 8HA the Council consider the site to be suitable for development with regard to landscape impact. 34

Policy LPC012: Flood Risk and Water Management

9.37 This Policy advocates a sequential approach in determining whether a site is suitable for development as well as providing detailed criteria against which developments should adhere to in respect of water, drainage and flood risk.

9.38 Our Client is broadly supportive of this Policy. With regards to their land interests at Site A recognise that the Council consider the site to be suitable for development with regard to flood risk. Furthermore, our Client would re-iterate that their Site B land interests, which are partially within Flood Zone 3, are also suitable for development given the independent flood modelling exercise that they have commissioned, and which adequately demonstrates that more of the Site is developable than previously envisaged by the Council. The allocation and development of Site B also offers the opportunity to deliver the wider community benefits, as outlined earlier within Section 8 of this representation. 35

Policy LPD01: Ensuring Quality Development

9.39 This Policy outlines detailed criteria against which all development proposals will be assessed. The Policy divides these criteria into three separate categories, these being Quality of the Built Environment; Environmental Quality; and Resource Management.

9.40 Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan. 36

Policy LPD02: Design and Layout of New Housing

9.41 This Policy outlines detailed design criteria for new residential developments to which all development proposals will be expected to adhere. Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan.

PO3650

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

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: mrs	Title:
First Name: Shirley Manley	First name:
Last Name: Manley	Last Name:
Organisation/company:	Organisation/company:
Address: 34 Smacklane Garswood	Address:
Postcode: WN4 0SN	Postcode:
Tel No:	Tel No:
Mobile [redacted]	Mobile No:
Email: [redacted]	Email:

Signature: [redacted] Date: 28/2/19

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

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

☐ Yes (via email) ☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate? IHA- IH5.

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA08 1 LPA09 2 LPA11 3 LPC12 4 LPC04 5									
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.

no infastructure for extra housing/no schools doctors/dentist to support/ use Ashton as the Doctors could never give appointments 2 weeks How are 500 more going to help.
cost of child to go to Wigan school as none in Area 5K + St Helens policy not to build any more (500 plus Child. more).
Junction 23. cant support / travel to Manchester would cause extra hour/hours to an disaster long drive / which also increase pollution / Health and Mental health issues it would cause, this Junction has taken the biggest hit all round Haydock and it will continue to decline if more buildings is done.
Brexit require's grow our own, so grade 2 fields are needed to supply Food - LOAN. Figures don't support canal. Figures

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.

- Infrastructure in place for existing houses
- schools to be built + floodings to be rectified - Provisions for increase of pollution on Health of community!.
- Transtration to be upgraded to acomodet Prams / Disabled /.
- Brownfield sites to be exhausted. Still alot available which are not being used.
- Mental Health provisions as decrease in Greenbelt will cause depression.

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

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

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Please keep a copy for future reference.

PO3651

270

PF 0249

St.Helens Council

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

Ref: LPSD

01 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	**2. Your Agent's Details (if applicable)**
Title: MISS	Title:
First Name: LEAH	First name:
Last Name: GLYNN-MANLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 34 Smackland Gardens	Address:
Postcode: WN4 0SN	Postcode:
Tel No:	Tel No:
Mobile [redacted]	Mobile No:
Email: [redacted]	Email:

Signature: [redacted] Date: 28-2-19

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

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

☑ Yes (via email) ☐ No

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

RETURN DETAILS

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Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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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? IHA IH5

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA12 LPA11 LPA07 LPA08 LPA04									
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.

Brexit requires us to be more self sufficient so loss of Grade 2 fields - No schools to support this increase in pollution so increase in Health Problems no doctor / Dentist to support increase St Helens population has declined and is continue to so no need to build these houses as OAN does not support this number - Traffic junction 23 is already under strain with this plus Florida farm it would be a major standstill. Mental Health will decline due to the anount of Greenbelt already taken in this area - Cost of sending child to Wigan is 5K so doesn't make cost effective 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 & Flooding in area.
Health Service that exists - no baby Clinic.
Transport - Irregular Trains taken off. Regular Bus
Disable facilities in Station required
Shop was stopped due to high traffic in area
How is 500 plus cars going to affect area if one shop is stopped?
Brexit provision required farm land. Require 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

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

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Please keep a copy for future reference.

PO3652

PF1299

①.LPA04 ③-LPA02 ⑤-LPC05
②-LPC12 ④-LPA07 ⑥-LPA03

St.Helens Council

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

Ref: LPSD

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

13 MAY 2019
1380

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: David	First name:
Last Name: Almond	Last Name:
Organisation/company:	Organisation/company:
Address: 33 Millbrook Lane Eccleston, St. Helens, Merseyside	Address:
Postcode: WA10 4QX	Postcode:
[redacted]	el No:
	lobile No:
	mail:

Signature: [redacted] **Date:** 11th May 2019

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

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

Yes ☑ (Via Email) No ☐

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

RETURN DETAILS

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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.

1

PART B – YOUR REPRESENTATION

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No ☒ ✓ No
Sound?	Yes ☐	No ☒ ✓ No
Complies with the Duty to Cooperate	Yes ☐	No ☒ ✓ 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?	☒ ✓ No
Justified?	☒ ✓ No
Effective?	☒ ✓ No
Consistent with National Policy?	☒ ✓ No

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

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Because Greenbelt meant protected. The council is lifting Greenbelt when it suits them. St Helens hasn't provided lots of jobs that need housing. (1)
The site would be on an area that floods. There (2)
is lots of brown field sites that need cleaning up and using first. Someone will have to clean (3)
the land up eventually. There is already too much traffic on the roads without additional pressure. (4)
The land is needed for food growing near to residential areas especialy if food transport becomes more expensive. (5)
More of the natural environment is being lost. (6)

Please continue on a separate sheet if necessary

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

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering. wind turbine factories. Then if they come and need employees, the Council would be able to justify the need for housing in the area.

Please continue on a separate sheet if necessary

Please note *your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*
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✓	**No,** I do not wish to participate at the oral examination		**Yes**, I wish to participate at the oral examination

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

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PO3653

PF1347

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).

1420

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: 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:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☑ (Via Email)	No ☐

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

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

Foreword and additions for the May 2019 representation:

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

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

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

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

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
   "The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

   1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
   "Likely to generate negative effects" for
   SA1. To protect and enhance biodiversity
   SA2. To protect and improve land quality in St Helens

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This is significant.

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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.

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.

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.

3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.

4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;

4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.

4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub.

4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park.

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:

PO3654

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).

1421

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

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.

PF1345.pdf

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.
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This is significant.

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PO3655

[redacted] PL0051

FIRE & RESCUE SERVICE

15 FEB 2019

(1) - LPD02
(2) - LPC12
(3) - LPA05

[redacted]
Chief Executive
St Helens Council
Town Hall
Corporation Street
St Helens
Merseyside WA10 1HP

Phil Garrigan
Chief Fire Officer
Merseyside Fire & Rescue Service
Fire & Rescue Service Headquarters
Bridle Road
Bootle
Merseyside
L30 4YD

[redacted]

Your ref:

Our ref: PG/CFO/SW

Date: 15th February 2019

Dear [redacted]

Response to St Helens Local Plan 2020-2035 consultation

Having read the Council's Local Plan 2020-2025, I note that you state that by 2035, "St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest."

The Fire and Rescue Service supports that aspiration, but I would like to raise a few points for your consideration relating to ensuring that we work together to help keep residents and visitors safe from fire now and in the future.

In relation to the following:

1. Strategic Aims 2 – Ensuring Quality Development and 5 - Ensuring a Strong and Sustainable Economy
2. Development Principles 4 - Contribute to inclusive communities, 5 - Contribute to a high quality built and natural environment and 7- Promote healthy communities
3. Policies LPA11: Health and Wellbeing, LPC01: Housing Mix, LPC03: Gypsies, Travellers and Travelling Show People, LPD02: Design and Layout of New Housing

I would like to request that the Council continues to work closely with the Fire and Rescue Authority to ensure that fire safety is considered as a priority as domestic and commercial property development applications progress through the life of the plan. For example, the Council using its influence to encourage developers to adopt the highest levels of fire safety within their buildings rather than simple compliance with legislation would be particularly useful to improve the safety of people in St Helens in the long term although we recognise that this is not something that can be specified within the Local Plan. (1)

In relation to Policy LPC12: Flood Risk and Water Management – it is encouraging to see that the policy seeks to ensure that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk. (2)

Stonewall
DIVERSITY CHAMPION

POSITIVE ABOUT DISABLED PEOPLE

As you may already be aware, we have a ten minute response standard for life risk calls that we aim to meet on at least 90% of occasions. Some of the areas identified for future development will fall outside the area that our fire appliances can usually reach within ten minutes which is unfortunately the case for some existing areas given the rural nature of the Borough. Our plan to replace the fire stations at Eccleston and Parr Stocks Road with a single new station at Watson Street is progressing and this will improve average attendance times in St Helens, but some of the areas where you propose new development may still fall outside our ten minute attendance.

We work to address this type of issue by providing increased levels of community safety intervention in these areas to prevent emergencies occurring, and will continue to do so, but it is important that developers are encouraged to adopt high levels of engineered fire safety solutions e.g. sprinkler systems, particularly in the light on ongoing budget cuts to the fire and rescue service.

It is of course, always our priority to work with you and other partner organisations to keep your communities as safe as possible and if you would like to discuss any of the matters I have raised please do not hesitate to contact me.

[redacted]

Chief Fire Officer

PO3656

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 polution.
There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there.
Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03
The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.
Add another 160 cars plus would add to congestion, pollution and noise levels.
This will also impact pedestrian safety to have increased traffic and again pollution levels.
I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough. 03
Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.
If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space. OK
If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road. 05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times. 03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.
At moment at least the water is near the farm land and does not always spread across the road.
If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented. 06
The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased. 07

7. Please set out modification(s) you consider are necessary
The council should not consider removing this land from green belt or open spaces to place in safe guarding.
I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
No, I do not wish to participate at the oral examination

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

Response Date	3/12/2019 3:02:20 PM

PO3657

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

lichfields.uk

This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.
Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.

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

[redacted]

1 Attachr

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

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[redacted]

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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

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

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			Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

17.0

Policy LPC12: Flood Risk and Water Management

Introduction

17.1 Policy LPC12 requires all developments to manage flood risk and ensure identified risks have been appropriately mitigated.

Consideration of Policy

17.2 TW is broadly supportive of Policy LPC12; however, TW would note that Part 3 does not align with national policy in respect of Sequential Tests. The Practice Guidance[12] states the developments which would not require a Sequential Text; for example, minor development, change of use and sites that have been allocated in development plans through the Sequential Test, also supported by §162 and §164 of the Framework. As a result, the wording of the Policy in its current form is not consistent with national policy.

Tests of Soundness

17.3 TW considers that Policy LPC12 fails to meet the following tests of soundness because:

1 **It is not consistent with national policy:** As presently worded, the policy does not reflect national policy and guidance in respect of sites not required to undertake a Sequential Test.

Recommended Change

17.4 In order to address the conflict above and ensure Policy LPC12 is sound, it is requested that the Council:

1 Amend the policy wording of Part 3 to align with national policy and guidance to make it clear which sites are not required to undertake a Sequential Text.

[12] Practice Guidance Reference ID: 7-033-20140306

PO3658

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
(5) - LPC12 - para 7.44
(6) - LPD 01
(7) - LPC 14
(8) - SA - para 7.58
(9) - SA - APPENDIX 5

St Helens Local Plan Formal Consultation Response
Sayce, Stephen
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:37

[redacted]

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

[redacted]



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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 Postcode: [redacted]	Address: Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13/03/2019

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EF0069

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Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

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Positively Prepared?	☐
Justified?	☐
Effective?	☐
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Source protection zones have been defined across a relatively large part of St Helens, particularly in the south of the Borough. In these areas we would expect planning applications for developments to be supported by an appropriate hydrogeological risk assessment. This will need to address both existing contamination which may be present and the impacts that the future ongoing operation of the site will have on the groundwater environment. Appropriate mitigation measures should be proposed to reduce the risk of pollution of groundwater. As such within **Policy Box LPC12: Flood Risk and Water Management, paragraph 7** reference should be made to the Environment Agency approach to groundwater protection and associated position statements including the potential need for hydrogeological risk assessments.

(3)

LF0069

https://www.gov.uk/government/collections/groundwater-protection

Developments incorporating SUDS schemes should be designed based on a site specific risk assessment in accordance with the CIRIA (C753) SUDS Manual. All SUDS schemes should be designed to include sufficient stages of treatment appropriate to the type of catchment being drained and the sensitivity of the receiving environment. Infiltration devices should not be used on contaminated land where there may be groundwater pollution risks and they may not work in areas with a high water table. This should be made clear in either **Policy LPC12; Flood Risk and Water Management paragraph 8** or the supporting policy justification,

Please continue on a separate sheet if necessary

(4)

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Modification to the text recommended just to strengthen the policy to avoid pollution of potable water supplies.

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EF0069

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PO3659

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
(5) - LPC12 - para 7.44
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(3)

LF0069

https://www.gov.uk/government/collections/groundwater-protection

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

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EF0069

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PO3660

EL0073
(1) - LPC12
(2) - GEN
(3) - LPD02
(4) - LPA04-1
(5) - LPA05-1
(6) - LPD05
(7) - LPC12
(8) - LPD01

St Helens - Submission Draft
Jones, Robin@Manchester
to:
planningpolicy@sthelens.gov.uk
12/03/2019 07:43

[redacted]

1 Attachment

St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,
Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd
10th Floor | One St Peters Square | Manchester | M2 3DE
[redacted]

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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

[redacted]

Date 12th March 2019

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

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

delays to delivery. We are keen to reemphasise the message that it is essential for early and continued detailed discussions take place over the revised allocations, in a bid to negotiate and agree any measures required to support the delivery of the proposed allocations within the revised draft. We strongly advise that contact is established at the earliest stage, ideally before any land transactions, and certainly prior to any application to explore options early as possible.

As more information becomes available on development proposals such as the approach to surface water drainage and the timing for the delivery of development, which is often only available at the planning application stage, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. We therefore request the Local Planning Authority encourages any future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. Future discussions must consider wider proposals, such as proposed transport schemes/improvements, to support new development. There is opportunity to co-ordinate the delivery of proposed highway schemes with any new infrastructure United Utilities may require to facilitate wider development in the borough.

There are a number of significant strategic allocations within the Local Plan and it is of the utmost importance that there is infrastructure delivered to sustainably serve these areas beyond the plan period. There is genuine opportunity to leave a positive legacy from new development by ensuring there is infrastructure that will serve not only the allocation but potentially make improvements for the wider area. The reason this is mentioned is that it at times goes beyond the planning system, requiring communication with highway departments or other stakeholders. We wish to work collaboratively alongside stakeholders to ensure the sustainable delivery of new development across the borough.

We wish to highlight our **free pre-application service** for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting:

Developer Services - Wastewater

[redacted]

Developer Services – Water

[redacted]

Specific Policies

Draft Policy LPC12: Flood Risk and Water Management

UU welcomes the approach taken within Policy LPC12 and specifically clauses 8 – 12 which address sustainable drainage. We do however suggest the following minor amendments to clause 10, please note that your wording is in red, and our suggestions are in blue:

(1)

'Discharge of surface water to a public combined sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period. Any development proposal should demonstrate unfettered rights to discharge between various phases.'

(1)

With respect to the detailed design of new development sites, we would like to highlight the importance of careful consideration of site drainage in comparison with proposed finished floor levels. We recommend policies on the design of new make reference to the need for applicants to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer. This helps ensure new development is more resilient to the impacts of climate change and the potential for flooding from sewers. A possible policy is set out below.

(2)

'Applicants will be expected to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer.'

Draft Policy LPD02: Design and Layout of New Housing

We suggest emerging Policy LPD02 includes an additional clause to ensure water efficiency measures are fully considered in the design of new development. Below is an example of wording that we would recommend including within this policy:

'New residential developments will be required to:

'11. to demonstrate the site is drained in the most sustainable way, making use of topography, landscaping and ground conditions should encourage water efficiency measures including water saving and recycling measures to minimise water usage. A developer may be required to accommodate an element of open space for the discharge of surface water through the incorporation of sustainable drainage systems.'

(3)

'12. Demonstrate the new development has considered incorporating water efficiency measures as part of the design.'

United Utilities seeks to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

PO3661

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
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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: 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 Postcode: [redacted]	Address: Postcode:
	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.

LF0069

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	LPC12	Paragraph / diagram / table	7.24.17	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

Water Quality

Paragraph 7.24.17 States;

There is increasing concern for the protection of the water environment, which not only serves as a source of water but provides essential habitats and a valued resource for leisure and recreation. Under the European Union Water Framework Directive (relevant requirements of which have been incorporated into national regulations61) water bodies must meet a range of chemical and ecological criteria to protect aquatic ecosystems and drinking water resources. All water bodies in the country are required to achieve a 'good' ecological status by 2027 at the latest.

Water Framework Directive is not limited to water quality but also the physical quality of our water environment. We would welcome comments highlighting development seeking to improve the hydromorphology of water courses which will contribute to the River Basin Management Plan to achieve a 'good' ecological status being added to the Local Plan.

Please continue on a separate sheet if necessary

(5)

6F0069

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.
Minor modification/addition to the text recommended to strengthen policy to promote watercourse improvements through new developments. Please continue on a separate sheet if necessary

(5)

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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)			
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 ref

PO3662

EF0011

(1) - LPC13
(2) - LPD01
(3) - GEN.

The new St Helens Local plan
sills john
to:
planningpolicy
07/03/2019 13:28

[redacted]

2 Attachments

lpsd-representation-form-1.pdf IMG_20170630_0001.jpg

attached are some comments relating to the documents...happy to discuss..docs are in pages and pdf...john sills

Ref: LPSD (For official use only)

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

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PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Dr	Title:
John	First name:
Sills	Last Name:
Organisation/company:	Organisation/company:
23, Knowsley Park Lane, Prescot, L34 3NA	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	7 March 2019

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

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

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
LPD02 Submission Draft		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 ☐	No ☐
Sound?	Yes ☐	No ☐
Complies with the Duty to Cooperate	Yes ☐	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

It is encouraging that the Council seem to have taken notice of the outrage produced by the attack on the GREEN BELT and have modified their proposals especially in the Eccleston Area, where it seemed to me the Council was wishing to produce continuous housing from the A580 to Prescot. With ref to LPD02, this is very difficult to read due to the orientation of the pages (could find no way of rotating the pages, and so have had to look at the pages with my head turned to the left!!!). Re HS08 & HS09, (pp149 & 150) it is good to see that these sites have been retained in the GREEN BELT. Re p47 EA2, the desecration of this site is something the Council should be ashamed of.

re Submission Draft LPC13 p128, and LPD01 p140-2, relating to housing and renewable and low carbon development, I think there should be more emphasis on the need in new builds to design them and build them as energy efficient as possible, thus minimising energy requirements for individual houses, reducing fuel costs for householders and contributing to a reduction in overall energy use. The Council could have a role in this in the process of granting Planning Permission.

The Council should continue as a principle to seek to use brown field sites for building and development, and given the suggested need for housing in Eccleston it is disappointing that the site of the former Methodist Church remains undeveloped. It is also a bit of an eyesore!

One final point which has not been touched on as far as I could ascertain is the question of leasehold. The Council may or may not beware that many houses built on the BICC site in Prescot, were built and sold as leasehold rather than freehold. As a result the leaseholds have been sold on and some residents are faced with escalating ground rents, which makes selling of the properties difficult. I would therefore urge the Council to have a policy of "no leasehold" when granting Planning Permission for new housing.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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No	**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*

PO3663

EL0074

St Helens Local Plan Submission Draft - Representations on behalf of Harworth Estates Ltd

Kirsty Czernucha

to:

'planningpolicy@sthelens.gov.uk'

12/03/2019 08:30

[redacted]

6 Attachments

HARM3013 Representations to the SHBC Local Plan Submission Draft- Harworth Estates Final.pdf

HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPA05.pdf

HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC01.pdf

HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC02.pdf

HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC13.pdf

HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPD07.pdf

Good morning

On behalf of our client, Harworth Estates Ltd, please find enclosed a copy of the representations and relevant comment forms to the St Helens Borough Local Plan 2020 – 2035 (Submission Draft).

I would be grateful if you could please confirm receipt of this email and the representations enclosed.

Kind regards
Alice Fitton

(1) – LPD07
(2) - LPC13
(3) - LPC02
(4) - LPC01
(5) - LPA05
(6) - LPA02
(7) - LPA05.1
(8) - S.A
(9) - LPA05 - Criterion 3

[redacted]

Turley
1 New York Street
Manchester M1 4HD

[redacted]

Linkedin

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St.Helens Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: C/O Agent	Title: Miss
First Name: C/O Agent	First name: Alice
Last Name: C/O Agent	Last Name: Fitton
Organisation/company: Harworth Estates Ltd	Organisation/company: Turley
Address: C/O Agent Postcode:	Address: 1 New York Street, Manchester Postcode: M1 4HD
[redacted]	

Signature: [redacted] **Date:** 11/03/2019

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐

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

RETURN DETAILS

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

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

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

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

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

EL0074

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	LPC13	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 ☐	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes ☐	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?	X
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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
Please see supporting Representations Report

Please continue on a separate sheet if necessary

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

Please see supporting Representations Report

Please continue on a separate sheet if necessary

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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:

LLO574

St Helens Borough Council Local Plan - Submission Draft

Moss Nook Urban Village, Watery Lane, Moss Nook

Representations on behalf of Harworth Estates Ltd

March 2019

Turley

positive effects to the land quality and as such should score 'Green'[2] in the SA (as opposed to 'Grey'[3]).

- Harworth agrees with the SA Scores for SA Objectives SA5, SA7a, SA9a, SA12a, SA12b, SA13b, SA14, SA16 and SA20 which all conclude development of the site is likely to promote positive effects on mitigating against climate change, landscape sensitivity, access to open space and green spaces, access to GPs, access to leisure, access to secondary schools, access to employment opportunities, access to housing, and access to services.

- Harworth agrees with the SA Scores for SA Objectives SA4, SA6, SA7b, SA9b, SA13a, SA15, and SA19 which all conclude that development of the site is unlikely to have any effects on sustainably managed water resources, minimising the risk of flooding, distance to a prominent ridgeline, public rights of way, access to primary schools, supporting the local economy, and reducing the need to travel.

- Harworth agrees with the SA Scores for SA Objective SA3 and SA8 which acknowledges that any negative effects on air quality and cultural heritage can be mitigated.

3.14 To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.

3.15 The allocation of this land will therefore further support the delivery of a sustainable brownfield site, significantly contributing towards the housing needs of the borough.

Development Management Considerations

3.16 Harworth supports the principle of having policies to manage the housing mix and the provision of affordable housing within new developments. However, emerging **Policies LPC01 'Housing Mix'** and **LPC02 'Affordable Housing'** should be amended so that they are flexible enough to acknowledge that the different scale, characteristics and density of each development site will vary from site to site.

3.17 As such, Harworth recommends that the policies are more positively prepared, to acknowledge that the provision of a suitable housing mix and affordable housing will be determined by a viability case, to ensure the development sites can be delivered on an individual basis.

3.18 Harworth supports the principle of emerging **Policy LPC13 'Renewable and Low Carbon Energy Development'** which seeks to reduce carbon emissions within the borough. However, this should not be a mandatory requirement for all future developments within the borough and it should be considered suitable when it is viable to do so.

---

[2] Green: Likely to promote positive effects

[3] Grey: Unlikely to have significant effects

PO3664

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
[redacted]

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
[redacted]

indigo.

RTPI AWARDS FOR PLANNING EXCELLENCE COMMENDED 2018
RTPI NORTH WEST AWARDS FOR PLANNING EXCELLENCE CATEGORY WINNER 2018
insider RESIDENTIAL PROPERTY AWARDS 2019 WINNER

RTPI Planning Consultancy of the Year 2017

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

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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).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

Would you like to be kept updated of future stages of the St Helens Borough 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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Town Hall
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St.Helens
Merseyside
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Email: planningpolicy@sthelens.gov.uk
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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

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

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

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

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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.

EL0200A.1.pdf

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

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3665

ELO229

St Helens Local Plan Submission Draft - strategic representations on behalf of Wainhomes NW

Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:

[redacted]

1 - GENERAL
2 - LPA05
3 - LPC02
4 - LPA05.1
5 - LPA06
6 - LPC01 - CRITERIA 1
7 - LPC01 - CRITERIA 2
8 - LPC01 - CRITERIA 3
9 - LPC13
10 - LPA05 - TABLE 4.6

ns.gov.uk>

1 Attachment

Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott
Assistant Consultant

[redacted]

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emery planning

Emery Planning Partnership Ltd trading as Emery Planning

Emery Planning
2-4 South Park Court
Hobson Street
Macclesfield
SK11 8BS

Registered office as above

emery planning

Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005

Emery Planning
1-4 South Park Court, Hobson Street
Macclesfield, SK11 8BS
Tel: 01625 433 881
www.emeryplanning.com

unlocking development opportunities

9. Policy LPC13: Renewable and Low Carbon Energy Development

9.1 Part 4 of the policy states:

> *"Proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s)."*

9.2 The Council's own viability evidence indicates that such a requirement would not be viable on the majority of sites (see Table 6.19 of the Council's viability assessment). In accordance with paragraph 57 of the Framework, it should not be necessary for viability to have to be assessed on a site by site basis due to a policy requirement which is not viable across the plan.

PO3666

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

[redacted]

1 Attachment

Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner

[redacted]

indigo.

RTPI Planning Consultancy of the Year 2017

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

[redacted]

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

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

Please see enclosed representation.

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination		**Yes**, I wish to participate at the oral examination

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

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

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

indigo.

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

[redacted]

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

By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

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

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

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

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation. 01

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough. 02

Registered office: Indigo Planning Ltd, Allenbury House 10-15 Queen Street, London EC4N 1TX
Registered number: 2578663 VAT number: 449 4613 34

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indigo.

therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base. 28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence. 29

We support the amendment of LPC02(3) to include provision of Starter Homes. 30

Policy LPC10: Trees and Woodland

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 I the loss of existing trees. 31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly. 32

Policy LPC13: Renewable and Low Carbon Energy Development

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources. 33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

Policy LPD01: Ensuring Quality Development

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form. 34

Policy LPD02: Design and Layout of New Housing

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development. 35

PO3667

EL01\2

HBF response to St Helens Local Plan Submission
Joanne Harding
to:
planningpolicy@sthelens.gov.uk
12/03/2019 17:26
Hide Details

[redacted]

2 Attachments

19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI
Local Plans Manager - North

HOME BUILDERS FEDERATION

[redacted]

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(1) - STRATEGIC AIMS & OBJECTIVES.
(2) - LPA05
(3) - LPA05 - PARA. 3
(4) - LPA05 - PARA 4
(5) - LPA07 - PART 3C
(6) - LPA07 - PART 9
(7) - LPC01 - PART 1
(8) - LPC01 - PART 2
(9) - LPC01 - PART 3
(10) - LPC01 - PART 4
(11) - LPC02
(12) - LPC10
(13) - LPC13
(14) - LPD07

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: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House, 27 Broadwall, London	Address:
Postcode: SE1 9PL	Postcode:
[redacted]	Tel No:
	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.

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

Yes ☑ (Via Email) No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *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 ☐ Please see separately attached letter.	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?	☐ Please see separately attached letter.
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 see separately attached letter.

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	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:
To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

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

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

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

SENT BY EMAIL
planningpolicy@sthelens.gov.uk
13/12/2018

Dear Sir / Madam,

ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members.

Vision and Objectives
The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:

The HBF support the part of the vision which states that *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as s et out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.

Policy LPC13: Renewable and Low Carbon Energy Development

The HBF does not consider that Policy LPC13 is sound, as it is not justified or consistent with national policy for the following reasons:

Part 4 of this policy states that proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s).

The HBF does not generally object to encouragement for the need to minimise the carbon emissions, or the inclusion of renewable or low carbon energy sources, however, it is important that this is not interpreted as a mandatory requirement. The HBF consider that any mandatory requirements would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015. The HBF recommend that the Council ensure that this policy is justified and consistent with national policy. The potential cost of the requirements of this policy needs to be taken into consideration. There are concerns that requirements such as these could lead to the non-delivery of homes in areas where development is intended to be focused. The HBF considers that this requirement should be removed.

13

Policy LPD07: Digital Communications

The HBF does not consider that Policy LPD07 is sound, as it is not justified, effective or consistent with national policy for the following reasons:

Subject to the requirements of Policy LPA08, contributions may also be sought from developers towards the cost of providing necessary off-site fast broadband infrastructure to serve the area.

The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF (2018) establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

14

The HBF consider that in seeking to provide broadband the Council should work proactively with telecommunications providers to extend provision and not rely on the

PO3668

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

lichfields.uk

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

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

[redacted]

1 Attachr

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

Sir / Madam

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

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

https://we.tl/t-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

lichfields.uk

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

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

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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

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

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

18.0

Policy LPC13: Renewable and Low Carbon Energy Development

Introduction

18.1 Policy LPC13 outlines that development that would produce low carbon or renewable energy will be supported and new development should try to incorporate sustainable design and construction measures to minimise carbon emissions.

Consideration of Policy

18.2 TW is committed to sustainable development and does not object to the need to minimise carbon emissions or include renewable or low carbon energy sources, where practical, however TW object to the wording of Part 4 of the Policy.

18.3 Part 4 states that large scale schemes that generate source or demand for heat should consider "*the feasibility of serving the development by means of a district heating scheme.*" Part 4 also states that within strategic employment and housing sites, unless shown to be unpractical or unviable new development must "*ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy sources*". Whilst TW welcomes the reference to practicability and viability in the Policy, it is not considered that inclusion of these provisions is justified, or in accordance with national policy.

18.4 It is considered that there is no justification in the Policy or explanatory text to justify these requirements above those required by applicable nationally described standards; nor is it adequately addressed as part of the viability report.

Tests of Soundness

18.5 TW considers that Policy LPC13 fails to meet the following tests of soundness because:

1 **It is not justified**: there is no evidence as part of the Local Plan to justify this requirement.

2 **It is not consistent with national policy:** It is not consistent with the Housing Standards Review which specified energy requirements for new housing to be a matter for Building Regulations.

Recommended Change

18.6 In order to address the conflicts above and ensure that Policy LPC13 is sound, it is requested that the Council:

1 Omit Part 4 reference to the requirement to consider 'district heat systems' and that "10% of their energy needs can be more from renewable and/or other low carbon energy source(s)".

PO3669

EL0258

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

SITE GBP_093_A

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

[redacted]

4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf

Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Neeeds Assessment.pdf

1 LPA05
2 LPA02
3 GBR
4 S.A.
5 S.O.4.1
6 S.O.5.1
7 LPA02 - PARA 3
8 LPA02 - PARA 4
9 LPA03
10 LPA04

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

11 LPA05 - PARA 3
12 LPA05 - PARA 4
13 APPENDIX 4
14 TABLE 4.6
15 LPA05.1
16 LPC02
17 LPC04
18 LPA07 - PARA 9, c)
19 LPA07, PARA 9
20 LPC10 - PARA 6

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

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21 LPA06
22 LPC01
23 LPC13 - PARA 4
24 LPD07
25 LPD02
26 LPD03.

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

[redacted]

1 Attachment

Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb
Associate Planner
Pegasus Group
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From: Graham Lamb
Sent: 13 March 2019 17:01
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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

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

[redacted]

1 Attachment

Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

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From: Graham Lamb
Sent: 13 March 2019 17:01
To: planningpolicy@sthelens.gov.uk
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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KW/GL/P17-0098/L004

13 March 2019

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

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

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.

- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.

- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

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

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

Yours sincerely,

[redacted]

Graham Lamb
Associate Planner
[redacted]

Encs.

APPENDIX 4.

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th March 2019

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

Pegasus Group

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

T 0161 393 3399 | **W** www.pegasuspg.co.uk

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9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, unless further justification is provided, and at the very least it should include some relaxation to allow for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and/ or other low carbon energy sources.

9.11 Whilst Redrow fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Governments Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Redrow fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations sets the appropriate standards

PO3670

SITE : FORMER LPA0 HS08

EL0289

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 1 of 4

Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

[redacted]

4 Attachments

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

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

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]
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1 - LPA05
2 - LPA02
3 - GBR
4 - S.A.
5 - S.O. 4.1
6 - S.O. 5.1
7 - LPA02 - PARA 3
8 - LPA02 - PARA 4
9 - LPA03
10 - LPA04
11 - LPA05 - PARA 3
12 - LPA05 - PARA 4
13 - APPENDIX 4
14 - TABLE 4.6
15 - LPA05.1
16 - LPA06
17 - LPC01
18 - LPC02
19 - LPC04
20 - LPA07 - PARA 3d
21 - LPA07 - PARA 9
22 - LPC10
23 - LPC13 - PARA 4
24 - LPD07
25 - LPD02
26 - LPD03

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 2 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:06

[redacted]

3 Attachments

Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf

Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

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

[redacted]

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

7 Attachments

Appendix 5-Agricultural Land Classification-Redrow.pdf

Appendix 6-Detailed Site Pro Forma-Redrow.pdf

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

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

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

Appendix 9c-Summary Supply Trajectory-Redrow.pdf

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

Email 3 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

1 Attachment

Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

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

[redacted]

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

[redacted]

Signature: [redacted] **Date:** 13/05/19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on 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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FURTHER INFORMATION

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

NEXT STEPS

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

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

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	LPC13	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 ☐	No ☐
Sound?	Yes ☐	**No x**
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?	x
Justified?	X
Effective?	X
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
10% RENEWABLE ENERGY TARGET FOR HOUSING DEVELOPMENT IS NOT JUSTIFIED AND IS A BUILDING REGULATIONS MATTER, NOT PLANNING POLICY. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

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:
PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

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

Pegasus Group

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

[redacted]

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9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, unless further justification is provided, and at the very least it should include some relaxation to allow for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and/ or other low carbon energy sources.

9.11 Whilst Redrow fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Governments Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Redrow fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations sets the appropriate standards

PO3671

Site: Former UPO HS23 EL0290

EL0290B.1.pdf

Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

3 Attachments

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

Appendix 1-Illustrative Masterplan-Wallace.pdf

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

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

[redacted]

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1. LPA05
2. LPA02
3. GBR
4. SA
5. S.O.4.1
6. S.O.5.1
7. LPA02 - PARA 3
8. LPA02 - PARA 4
9. LPA03
10. LPA04
11. LPA05 - PARA 3
12. LPA05 - PARA 4
13. APPENDIX 4
14. LPA05 - TABLE 4.6
15. LPA05.1
16. LPA06
17. LPC01
18. LPC02
19. LPC04
20. LPA07 - PARA 3c)
21. LPA07 - PARA 9
22. LPC10
23. LPC13 - PARA 4
24. LPD07
25. LPD02
26. LPD03

Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

4 Attachments

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

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

Email 2 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

1 Attachment

Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

2 Attachments

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

Email 4 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:15

[redacted]

1 Attachment

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

Email 5 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8
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planningpolicy@sthelens.gov.uk
13/05/2019 16:15

[redacted]

1 Attachment

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

Email 6 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[redacted]

7 Attachments

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

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

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

Appendix 8c-Summary Supply Trajectory-Wallace.pdf

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

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

Email 7 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[redacted]

1 Attachment

Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [redacted] **Date:** 13/05/2019

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes ☒ (Via Email)	No ☐
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St.Helens** **Merseyside** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)
or by e-mail to:	planningpolicy@sthelens.gov.uk

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Telephone:	01744 676190

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3. To which part of the Local Plan does this representation relate?									
Policy	LPC13	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 ☐	No ☐
Sound?	Yes ☐	**No X**
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?	**X**
Justified?	**X**
Effective?	**X**
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

10% RENEWABLE ENERGY TARGET FOR HOUSING DEVELOPMENT IS NOT JUSTIFIED AND IS A BUILDING REGULATIONS MATTER, NOT PLANNING POLICY.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make

the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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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)			
	No, I do not wish to participate at the oral examination	**X**	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

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

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

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

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

Pegasus Group

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

[redacted]

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Live: 45457800 v 3

9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, and tree planting considered on a case by case basis taking into account site specifics, such as, for example, the need for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and / or other low carbon energy sources.

9.11 Whilst Wallace fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Government's Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need. It is up to individual house occupiers and businesses to select their energy providers. This is not a matter that can be controlled through the planning system.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Wallace fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

PO3672

St Helens Local Plan Submission Draft
Melanie Lindsley
to:
planningpolicy@sthelens.gov.uk
11/03/2019 13:18

[redacted]

2 Attachments

St Helens Local Plan Submission Draft Representations Form. DEV.doc

St Helens Local Plan Submission Draft Representations Form.doc MIN.doc

Dear Sir/Madam

Please find attached the comments of the Coal Authority on the completed response forms.

Regards

Melanie

The Coal Authority

Melanie Lindsley *BA(Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader

[redacted]

W : gov.uk/government/organisations/the-coal-authority

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Resolving the impacts of mining. Like us on Facebook or follow us on Twitter and LinkedIn.

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Melanie	First name:
Last Name: Lindsley	Last Name:
Organisation/company: The Coal Authority	Organisation/company:
Address: 200 Lichfield Lane, Mansfield, Notts Postcode: NG18 4RG	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 11 March 2019

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
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	LPC14	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	☐
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

The Coal Authority supports the inclusion of Policy LPC14: Minerals which sets out criteria against which proposals within the MSA will be considered. We are pleased to see that coal is one of the minerals identified within this defined area.

This policy also sets out criteria against which proposals for mineral extraction will be assessed and includes a framework for consideration of hydrocarbons, which is welcomed.

(2)

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

this to be necessary:

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

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

PO3673

ELO139

ST HELENS LOCAL PLAN 2020 - 2035 – SUBMISSION DRAFT (JANUARY 2019)

Nick Horsley
to:
planningpolicy@sthelens.gov.uk
12/03/2019 22:28

[redacted]

(1) - LPC14 - PART 1
(2) - LPC14 - PART 4
(3) - PARA 7.30.6

1 Attachment

pnh1219 – St Helens.pdf

Dear Sir/Madam

Please find attached the MPA's comments to the above document.

Please do not hesitate to comeback to me if you have any questions about the representation.

Yours faithfully

Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales
Mineral Products Association
Registered Office: 38-44 Gillingham Street, London, SW1V 1HU

[redacted]

make the link
to mineral products

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12th March 2019

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

Mineral Products Association Ltd
Gillingham House
38 - 44 Gillingham Street
London SW1V 1HU
[redacted]
www.mineralproducts.org

Email: planningpolicy@sthelens.gov.uk

Dear Sir/Madam

ST HELENS LOCAL PLAN 2020 - 2035 - SUBMISSION DRAFT (JANUARY 2019)

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of 500 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which had annual output valued at £151 billion in 2016. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

We thank the council for consulting the MPA on the above document. We have the following comments to make.

Page/Policy	Current Wording	MPA Comment	Amendments required
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Registered at the above address

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We trust the above comments are helpful and would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan.

Yours faithfully

[redacted]

Nick Horsley

Director of Planning

[redacted]

PO3674

ELO139

ST HELENS LOCAL PLAN 2020 - 2035 – SUBMISSION DRAFT (JANUARY 2019)

Nick Horsley
to:
planningpolicy@sthelens.gov.uk
12/03/2019 22:28

[redacted]

(1) - LPC14 - PART 1
(2) - LPC14 - PART 4
(3) - PARA 7.30.6

1 Attachment

pnh1219 – St Helens.pdf

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Please do not hesitate to comeback to me if you have any questions about the representation.

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Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales
Mineral Products Association
Registered Office: 38-44 Gillingham Street, London, SW1V 1HU

[redacted]

make the link
to mineral products

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12th March 2019

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

Mineral Products Association Ltd
Gillingham House
38 - 44 Gillingham Street
London SW1V 1HU
[redacted]
www.mineralproducts.org

Email: planningpolicy@sthelens.gov.uk

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We thank the council for consulting the MPA on the above document. We have the following comments to make.

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Policy LPC14	4. Proposals for the exploration, extraction, storage, processing and/or distribution of minerals will only be permitted if it has been demonstrated that:...	Other subsections to this policy are planned positively in accordance with the requirements of the NPPF. Unfortunately, this is not the case for subsection 4. Amend the wording to ensure this accords with the NPPF requirement to plan positively	4. Proposals for the exploration, extraction, storage, processing and/or distribution of minerals will ~~only~~ be permitted ~~if~~ **where** it has been demonstrated that:...
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We trust the above comments are helpful and would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan.

Yours faithfully

[redacted]

Nick Horsley

Director of Planning

[redacted]

PO3675

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
(5) - LPC12 - para 7.44
(6) - LPD 01
(7) - LPC 14
(8) - SA - para 7.58
(9) - SA - APPENDIX 5

St Helens Local Plan Formal Consultation Response
Sayce, Stephen
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:37

[redacted]

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

[redacted]



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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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 Postcode: [redacted]	Address: Postcode:
	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.

LF0069

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	LPC14	Paragraph / diagram / table	7.28	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	☐
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

Mineral developments have the potential to have a significant impact on water resources. We would wish to see this strengthened. (7)

Please continue on a separate sheet if necessary

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

We would strongly recommend the inclusion of a statement to avoid or appropriately mitigate any adverse impacts relating to water resources within the criteria outlined **Part 5 of LPC14: Minerals** to strengthen the wording. (7)

EF0069

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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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:

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

PO3676

ELO139

ST HELENS LOCAL PLAN 2020 - 2035 – SUBMISSION DRAFT (JANUARY 2019)

Nick Horsley
to:
planningpolicy@sthelens.gov.uk
12/03/2019 22:28

[redacted]

(1) - LPC14 - PART 1
(2) - LPC14 - PART 4
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1 Attachment

pnh1219 – St Helens.pdf

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Yours faithfully

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Mineral Products Association
Registered Office: 38-44 Gillingham Street, London, SW1V 1HU

[redacted]

make the link
to mineral products

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12th March 2019

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Development Plans Section,
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Mineral Products Association Ltd
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We trust the above comments are helpful and would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan.

Yours faithfully

[redacted]

Nick Horsley

Director of Planning

[redacted]

PO3677

St Helens Local Plan Submission Draft
Melanie Lindsley
to:
planningpolicy@sthelens.gov.uk
11/03/2019 13:18

[redacted]

2 Attachments

St Helens Local Plan Submission Draft Representations Form. DEV.doc

St Helens Local Plan Submission Draft Representations Form.doc MIN.doc

Dear Sir/Madam

Please find attached the comments of the Coal Authority on the completed response forms.

Regards

Melanie

The Coal Authority

Melanie Lindsley *BA(Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader

[redacted]

W : gov.uk/government/organisations/the-coal-authority

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Resolving the impacts of mining. Like us on Facebook or follow us on Twitter and LinkedIn.

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St.Helens Council

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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: Mrs	Title:
First Name: Melanie	First name:
Last Name: Lindsley	Last Name:
Organisation/company: The Coal Authority	Organisation/company:
Address: 200 Lichfield Lane, Mansfield, Notts Postcode:NG18 4RG	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Sign [redacted] **Date:** 11 March 2019

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

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

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FURTHER INFORMATION

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	Policy LDP01	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

The Coal Authority is pleased to see that Policy LDP01 requires consideration of ground stability issues as part of development proposals. (1)

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)

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.

PO3678

EL0073
1 - LPC12
2 - GEN
3 - LPD02
4 - LPA04.1
5 - LPA05.1
6 - LPD05
7 - LPC12
8 - LPD01

St Helens - Submission Draft
Jones, Robin@Manchester
to:
[redacted]

1 Attachment

St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,
Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd
10th Floor | One St Peters Square | Manchester | M2 3DE
[redacted]

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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

[redacted]

Date 12th March 2019

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

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

Within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided.'

(7)

Health and Wellbeing

In regards to health, well-being and maximising the quality of residential amenity, UU wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour. In this regard, UU supports clause cof Policy LPD01: Ensuring Quality Development. Furthermore, UU are pleased to see that the sites identified within the Draft Submission are located away from our wastewater treatment works.

We feel it is important to re-emphasise that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure. A wastewater treatment works can result in emissions which include odour and noise. Therefore, if you are considering any sites for new allocations, especially housing allocations, near to wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing such sites with potential alternative sites that may be available to you for allocation. The position of United Utilities is that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works.

(8)

Our wastewater treatment works in your borough include:

- St Helens WwTW
- Prescott WwTW
- Billinge WwTW
- Billinge South WwTW

Note that Lingley Mere WwTW is located within Warrington's authority boundary, but directly bounds St Helens.

PO3679

LL0095

local plan
D HULL
to:
planningpolicy
12/03/2019 14:20
[redacted]

In response to the St Helens Council Local Plan 2020-2035.

This statement relates to site 8HA in Rainford.

This site is an area of grade one agricultural land being used by a local farmer for crop cultivation and supplying local supermarkets.

It lies within the green belt surrounding the village.

National policy guidelines relating to green belt land state that this land should be released for development only in EXCEPTIONAL circumstances.

There are no EXCEPTIONAL circumstances in this case.

St Helens has a falling population and house prices within the area are below the national and local average. There are also a significant number of empty properties within the borough.

There are a number of brownfield sites within the borough. Enough to achieve the Council's targets for house supply now and well into the future.

Choosing this greenbelt land 8HA for development negates 4 out of 7 of the Council's initial aims and objectives.

* It does NOT ensure strong,sustainable economy.

*It will NOT enhance quality of life for local residents.

*No extra resources or infrastructure will be allocated to the village to cope with the increase in population.

*It does not promote sustainable transport.

LPD01 states that any development should avoid causing harm to amenities of the local area and surrounding residential and other land users and occupiers.

LPA11 states that any development should maximise levels of accessibility between homes, educational establishments, jobs,public transport services, health and other services. There should be no negative effects on air quality and no increase in pollution.

This development fails to deliver the stated criteria in all these areas. It should not be passed.

Margaret Hull.

PO3680

St Helens Local Plan - Presubmission consultation
John Fleming
to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:13

[redacted]

2 Attachments

St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

St Helens Local Plan - Presubmission consultation

Please find attached the response of Gladman Developments to the above consultation.

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

Yours faithfully,

John Fleming

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Fleming	Last Name:
Organisation/company: Gladman Developments	Organisation/company:
Address: Gladman House, Alexandria Way, Congleton Postcode: CW12 1LB	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 13th March 2019

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

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

Yes ☐ (Via Email) No ☐

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St.Helens Council
Town Hall
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St.Helens
Merseyside
WA10 1HP

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No ☐x
Sound?	Yes ☐	No ☐x
Complies with the Duty to Cooperate	Yes ☐	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 representations.

Please continue on a separate sheet if necessary

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

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

Please see attached representations

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

EL0162A.1.pdf

St Helen's Local Plan

Pre- Submission Version

Gladman Representations

GLADMAN

March 2019

- **Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes);**
- **The accessibility and adaptability of existing stock;**
- **How needs vary across different tenures; and**
- **The overall impact of viability."[5]**

4.6.4 Gladman note that these technical standards have deliberately been set as optional standards which, if to be included as a policy in the Local Plan, would need to be justified by robust evidence. Gladman do not consider that sufficient evidence has been made available to support the requirements. Although it is accepted that evidence suggests an ageing population in the borough, this alone does not justify the use of optional building regulations as this is consistent with the national trend.

4.6.5 When considering this policy, the Council need to be aware of the impact that these requirements can have on scheme viability and the knock-on effects that this could have on the delivery of much needed housing. Flexibility within the policy wording should be included which provides 'support' for provision of M4(2) and M4(3) homes and not set a policy requirement which could impact development viability.

4.7 Policy LPD01: Ensuring quality development

4.7.1 The above policy requires development proposals to include or contribute to the provision of public art where the development would be of a substantial size and/or in a prominent gateway or town centre location.

4.7.2 Gladman draw the Council's attention to paragraph 54 of the NPPF which clearly states planning obligations should only be used where it is not possible to address unacceptable impacts through a planning application. The lack of public art is plainly not an unacceptable impact. The principle also predates CIL and the associated regulations, as well as the new focus in NPPF2019 on improved design standards. The Council should not be seeking to introduce a policy requirement which has no planning basis and

[5] PPG ID: 56-007-20150327

unrelated to the acceptability of a development proposal. This requirement should therefore be removed from Policy LDP01.

PO3681

St Helens Local Plan 2020 - 2035, Submission Draft - Representations
Dan Ingram
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:20

[redacted]

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
[redacted]

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).

PART A – YOUR DETAILS

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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 WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

[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.

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

EL0192A.2.pdf

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

PART B – YOUR REPRESENTATION

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	No ☐
Sound?	Yes ☐	No ☐
Complies with the Duty to Cooperate	Yes ☐	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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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 REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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:

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.

Marnel Park Development Strategy.pdf
EL0192

St Helens Borough Local Plan 2020 - 2035
Submission Draft

Representations on behalf of Miller Homes

March 2019

[redacted]

BARTON WILLMORE

Marnel Park Development Strategy.pdf
EL0192

requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development, the Policy provides a mechanism for mitigation and/or compensation as appropriate.

9.36 Our Client is broadly supportive of this Policy, recognising that in allocating site 8HA the Council consider the site to be suitable for development with regard to landscape impact. 34

Policy LPC012: Flood Risk and Water Management

9.37 This Policy advocates a sequential approach in determining whether a site is suitable for development as well as providing detailed criteria against which developments should adhere to in respect of water, drainage and flood risk.

9.38 Our Client is broadly supportive of this Policy. With regards to their land interests at Site A recognise that the Council consider the site to be suitable for development with regard to flood risk. Furthermore, our Client would re-iterate that their Site B land interests, which are partially within Flood Zone 3, are also suitable for development given the independent flood modelling exercise that they have commissioned, and which adequately demonstrates that more of the Site is developable than previously envisaged by the Council. The allocation and development of Site B also offers the opportunity to deliver the wider community benefits, as outlined earlier within Section 8 of this representation. 35

Policy LPD01: Ensuring Quality Development

9.39 This Policy outlines detailed criteria against which all development proposals will be assessed. The Policy divides these criteria into three separate categories, these being Quality of the Built Environment; Environmental Quality; and Resource Management.

9.40 Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan. 36

Policy LPD02: Design and Layout of New Housing

9.41 This Policy outlines detailed design criteria for new residential developments to which all development proposals will be expected to adhere. Our Client is supportive of this Policy and recognises the need for high quality, aspirational development in meeting the Vision and Objectives of the New Local Plan.

PO3682

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
[redacted]

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
[redacted]

indigo.

RTPI AWARDS FOR PLANNING EXCELLENCE COMMENDED 2018
RTPI NORTH WEST AWARDS FOR PLANNING EXCELLENCE CATEGORY WINNER 2018
insider RESIDENTIAL PROPERTY AWARDS 2019 WINNER

RTPI Planning Consultancy of the Year 2017

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

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

Would you like to be kept updated of future stages of the St Helens Borough 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)		2017 Strategic Housing Land Availability Assessment							

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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

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

EL0200A.1.pdf

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

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3683

Representor Details

Web Reference Number	WF0436
Type of Submission	Web submission
Full Name	Ms Sarah Byrne
Organisation	N/A
Address	9 Amanda Road, Rainhill L35 8PN
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	LPA01, LPA02, LPA05, LPA06, LDP01
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
I am unable to comment if the Local Plan is legally compliant as I am not legally trained. I would have selected 'Don't Know' if that was available. However, I do believe that the plan is contradictory throughout - please see below.

LPA01 and LPA02:

Points 2 and 4 of this Policy refer to the development providing necessary infrastructure and services, and that the development will be sustainable or made to be sustainable. Infrastructure and services such as doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. Additionally, the ageing population of Rainhill does not correlate with the proposed need for more housing to be built; care homes and local authority are services are already at maximum capacity, hence the rise in council tax to accommodate this.

Point 8 of this Policy refers to the quality of life, health and well-being for residents. I disagree with this point. As stated above, doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. I believe the development will add to an already strained NHS, and in the long term will impact the physical and mental health of residents, in addition to the staff having to provide these services.

Further, I believe that additional traffic that will result from the potential development is a danger to residents (particularly children and the elderly, the latter being a large part of the Rainhill demographic). 'A' and 'B' roads such as Warrington Road, Rainhill Road and Portico Lane are already frequently jammed, especially Monday to Friday 15:00-18:30. As a result, this adversely affects minor 'B' and 'C' roads such as View Road, Two Butt Lane and Longton Lane. Warrington Road in particular also already services the Liverpool City Regional Plan. Warrington Road, Rainhill Road, and Portico Lane have been confirmed by the council as being already at maximum capacity for traffic. Building more houses will only add to this problem.

Most households have an average of two cars; I believe that further developments will double the already heavy traffic within Rainhill, in addition to impacting the quality of the environment – how will this reduce the impact on climate change, carbon emissions and promote healthy communities as also set out in LPA01? How is the proposal for more development in line with wider government climate change and healthy lifestyle priorities?

(3) LPA05 and LPA06: (4)

Number of houses proposed is too great in these sections – I do not believe that the level of development is sustainable, and would have detrimental effects on the environment, quality of life, traffic and pollution levels, and public services. St Helens area, particularly Thatto Heath, is the second highest effected by respiratory disease, St Helens having an average of 51.9 deaths per 100,000 in under age 75 in comparison for the North West (which stands at 44.3). How will an increase in traffic and destroying greenbelt land reduce this figure? I believe developments may encourage existing residents to move from the area. I am currently entertaining this idea; one of the main reasons I moved to Rainhill was because of its natural space and smaller community. I did not move from an urban area to live in another urban area.

How is urban sprawl being controlled if the parcel of 3HS is released for development? The whole idea of having a greenbelt is to ensure neighbouring boroughs do not merge, to safeguard protected flora and fauna species (of which St Helens boasts 13 protected species), and control flooding/water flow which will be adversely affected if this land is built on. 3HS is a confirmed zone two and three flood zone with a high water table. How will this land be able to control and drain flooding if it is built on? Will the council be responsible for damage to properties as a result of this potential flooding if they fail to consider this confirmation? Will the council accept responsibility for the reduction or demise of the at least 13 protected flora and fauna species on this land? Greenbelt land is greenbelt for good reason and is meant to be sustained for a variety of reasons, not sold when the price is right.

Objections submitted at stage one of the local plan by Sport England in relation Eccleston Park Golf Club losing status as a recreational space and golf club remains unanswered by St Helen's Council. Any objection from a statutory consultee must be resolved – why is this still outstanding and when will it be addressed?

Additionally, although competition between developers has been suggested, I do not believe that the developments will be affordable. I believe that these houses will be retailed at maximum prices, thus resulting in slow if no uptake. Slow uptake of the recent developments at Badgers Close in Rainhill strongly suggest this. Growth of employment opportunities does not necessarily mean growth of income. Proposed employment industrial/storage/warehousing sites often employ those on minimum wages or just over. [redacted] Additionally, table 4.6 in LPA06 shows the need for 7245 houses; 1437 additional houses using 57 hectares of land is required, not 288 as claimed in table 4.5.

LDP01: (5)

I believe the level of proposed development is a direct contradiction to points 1 (ii, iii, iv, v and viii) and 2 (iii).

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

In line with the National Planning Policy Framework for 2019, this land should not be listed as land for proposed removal from the greenbelt, and should therefore be deleted from this list. Further, this land should not be removed from the greenbelt for development, and also should not be re-listed/re-categorised as 'safeguarded'.

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

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

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

Response Date	2/27/2019 3:16:23 PM

PO3684

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

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

[redacted]

1 Attachr

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

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, 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

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Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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)

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Ms	Title: 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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

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

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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)			
			Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

19.0 # Policy LPD01: Ensuring Quality Development

Introduction

19.1 Policy LDP01 seeks to ensure that new development is of a high quality and provides buildings and places that will function well and be visually attractive and resource efficient.

Consideration of Policy

19.2 TW acknowledges the importance of ensuring that new developments are of high quality and that they respect the local vernacular and character of the surrounding area. In this respect, TW supports the principle of the policy but has concerns over the effectiveness of the Part 1c, 1h and 1i.

19.3 Part 1c requires development to ensure that "*occupiers enjoy an appropriate standard of amenity*" whilst TW agree this is important, it is not clear how developers are expected to demonstrate this.

19.4 Similarly, Part 1h requires development to "*include or contribute to the provision of public are in appropriate circumstances*" but there is no clear definition of "appropriate circumstances". Furthermore, having reviewed the evidence base, TW is unable to find any reference to the requirement for new developments to make provisions for Public Art; any policy included in the Local Plan must be justified and based on robust and sound evidence. Moreover, it does not appear that contributions to public art have been assessed as part of the viability report; therefore, the financial implications have not been tested.

19.5 Part 1i) requires the provision for the needs of special groups in the community such as the elderly and those with disabilities. TW, as a responsible developer, fully support inclusive design but object to the effectiveness of the policy as it is not clear what the requirements are to meet this objective.

19.6 TW would note in respect of Part 3c, it has made comments relating to the soundness of Policy LPC13, and would suggest that its reference to Policy LPC13 is removed.

Tests of Soundness

19.7 TW considers that Policy LPC13 fails to meet the following tests of soundness because:

1 **It is not justified**: A requirement to provide public art has not been considered as part of the viability report.

2 **It is not effective**: The policy fails to provide clear guidance as to how to quantify an "appropriate standard of amenity". It fails to provide guidance as to what circumstances public art would be appropriate. The policy is not clear in respect of Part 1i as to how the provision of needs of special groups in the community will be provided for, who it will be delivered by and the quantum required.

3 **It is not consistent with national policy:** The requirement would fail the tests set out in the Framework.

Recommended Change

19.8 In order to address the conflicts above and ensure that Policy LPD01 is sound, it is requested that the Council:

1 Consider whether Part 1c, 1h and 1i are necessary and justified and provide a clear strategy for how developers contribute to these objectives.

2 Remove reference to Policy LPC13.

PO3685

EL0211

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

[redacted]

1 Attachment

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Melissa Wilson
Senior Planner
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[redacted]

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Brian

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

[redacted]

1 Attachr

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Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

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

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EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

19.0 # Policy LPD01: Ensuring Quality Development

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3 **It is not consistent with national policy:** The requirement would fail the tests set out in the Framework.

Recommended Change

19.8 In order to address the conflicts above and ensure that Policy LPD01 is sound, it is requested that the Council:

1 Consider whether Part 1c, 1h and 1i are necessary and justified and provide a clear strategy for how developers contribute to these objectives.

2 Remove reference to Policy LPC13.

PO3686

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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

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Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

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

[redacted]

1 Attachr

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

Sir / Madam

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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.**

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Ms	Title: 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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
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Mobile No:	Mobile No:
Email:	Email: [redacted]

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EL021

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Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

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EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

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17081285v8

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Recommended Change

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PO3687

EL0211

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

[redacted]

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Soundness Representations

Taylor Wimpey UK Limited

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PO3688

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

[redacted]

1 Attachment

Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner

[redacted]

indigo.

RTPI Planning Consultancy of the Year 2017

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

[redacted]

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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

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PART A – YOUR DETAILS

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

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

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

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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 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 ☐	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?	☐

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

Please see enclosed representation.

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

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.

indigo.

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

[redacted]

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

By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

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

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

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

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation. 01

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough. 02

Registered office: Indigo Planning Ltd, Allenbury House 10-15 Queen Street, London EC4N 1TX
Registered number: 2578663 VAT number: 449 4613 34

RTPI AWARDS FOR PLANNING EXCELLENCE WINNER 2017

indigo.

therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base. 28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence. 29

We support the amendment of LPC02(3) to include provision of Starter Homes. 30

Policy LPC10: Trees and Woodland

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 I the loss of existing trees. 31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly. 32

Policy LPC13: Renewable and Low Carbon Energy Development

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources. 33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

Policy LPD01: Ensuring Quality Development

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form. 34

Policy LPD02: Design and Layout of New Housing

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development. 35

PO3689

EF0069
(1) - LPA09
(2) - LPA06
(3) - LPC12 - part 7
(4) - LPC12 - part 8
(5) - LPC12 - para 7.44
(6) - LPD 01
(7) - LPC 14
(8) - SA - para 7.58
(9) - SA - APPENDIX 5

St Helens Local Plan Formal Consultation Response
Sayce, Stephen
to:
planningpolicy@sthelens.gov.uk
13/03/2019 13:37

[redacted]

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

[redacted]



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.





Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please not

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.
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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Mr	Title:
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 Postcode: [redacted]	Address: Postcode:
	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.

EF0069

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	LDP01	Paragraph / diagram / table	8.1	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 X	No ☐
Sound?	Yes X	No ☐
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	☐
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

We welcome the inclusion of measures to reduce the impact of development to the water environment, specifically **Part 2.a) of Policy LPD01: Ensuring Quality Development** that states;

2. Environmental Quality
a) Ensure protection of watercourses and other water bodies from encroachment, modification and degradation and enable water bodies that are already modified or degraded to be improved to form sustainable, natural environments where feasible.

We generally require at least an 8 metre buffer along water courses (from the top of the bank) to ensure both access and maintenance requirements as well as providing for ecological enhancement and would support this being added to either the policy wording or supporting justification.

Please continue on a separate sheet if necessary

6

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

LF0069

compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
This wording could be strengthened to provide a minimum distance of protection. 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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X	**No,** I do not wish to participate at the oral examination		**Yes**, I wish to participate at the oral examination

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

PO3690

EF0011

(1) - LPC13
(2) - LPD01
(3) - GEN.

The new St Helens Local plan
sills john
to:
planningpolicy
07/03/2019 13:28

[redacted]

2 Attachments

lpsd-representation-form-1.pdf IMG_20170630_0001.jpg

attached are some comments relating to the documents...happy to discuss..docs are in pages and pdf...john sills

Ref: LPSD (For official use only)

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

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1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Dr	Title:
John	First name:
Sills	Last Name:
Organisation/company:	Organisation/company:
23, Knowsley Park Lane, Prescot, L34 3NA	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature:	[redacted]	**Date:**	7 March 2019

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

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

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

RETURN DETAILS

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

post to:

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

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

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Telephone: 01744 676190

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3. To which part of the Local Plan does this representation relate?									
LPD02 Submission Draft		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 ☐	No ☐
Sound?	Yes ☐	No ☐
Complies with the Duty to Cooperate	Yes ☐	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?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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> <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

It is encouraging that the Council seem to have taken notice of the outrage produced by the attack on the GREEN BELT and have modified their proposals especially in the Eccleston Area, where it seemed to me the Council was wishing to produce continuous housing from the A580 to Prescot. With ref to LPD02, this is very difficult to read due to the orientation of the pages (could find no way of rotating the pages, and so have had to look at the pages with my head turned to the left!!!). Re HS08 & HS09, (pp149 & 150) it is good to see that these sites have been retained in the GREEN BELT. Re p47 EA2, the desecration of this site is something the Council should be ashamed of.

re Submission Draft LPC13 p128, and LPD01 p140-2, relating to housing and renewable and low carbon development, I think there should be more emphasis on the need in new builds to design them and build them as energy efficient as possible, thus minimising energy requirements for individual houses, reducing fuel costs for householders and contributing to a reduction in overall energy use. The Council could have a role in this in the process of granting Planning Permission.

The Council should continue as a principle to seek to use brown field sites for building and development, and given the suggested need for housing in Eccleston it is disappointing that the site of the former Methodist Church remains undeveloped. It is also a bit of an eyesore!

One final point which has not been touched on as far as I could ascertain is the question of leasehold. The Council may or may not beware that many houses built on the BICC site in Prescot, were built and sold as leasehold rather than freehold. As a result the leaseholds have been sold on and some residents are faced with escalating ground rents, which makes selling of the properties difficult. I would therefore urge the Council to have a policy of "no leasehold" when granting Planning Permission for new housing.

Please continue on a separate sheet if necessary

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

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PO3691

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

[redacted]

1 Attachment

Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner

[redacted]

indigo.

RTPI Planning Consultancy of the Year 2017

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

[redacted]

This e-mail (including any attachments is intended only for the recipient(s) named above.
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If you are not a named recipient, please contact the sender and delete the e-mail from the system.

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

Signature: [redacted] **Date:** 13/03/2019

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Yes ☐ (Via Email) No ☐

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post to:

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

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

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Complies with the Duty to Cooperate	Yes ☐	No ☐

Please tick as appropriate

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Positively Prepared?	☐
Justified?	☐
Effective?	☐
Consistent with National Policy?	☐

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

indigo.

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

[redacted]

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

By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

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

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

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

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation. 01

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough. 02

Registered office: Indigo Planning Ltd, Allenbury House 10-15 Queen Street, London EC4N 1TX
Registered number: 2578663 VAT number: 449 4613 34

RTPI AWARDS FOR PLANNING EXCELLENCE WINNER 2017

indigo.

therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base. 28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence. 29

We support the amendment of LPC02(3) to include provision of Starter Homes. 30

Policy LPC10: Trees and Woodland

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 I the loss of existing trees. 31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly. 32

Policy LPC13: Renewable and Low Carbon Energy Development

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources. 33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

Policy LPD01: Ensuring Quality Development

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form. 34

Policy LPD02: Design and Layout of New Housing

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development. 35

PO3692

EL0073
(1) - LPC12
(2) - GEN
(3) - LPD02
(4) - LPA04-1
(5) - LPA05-1
(6) - LPD05
(7) - LPC12
(8) - LPD01

St Helens - Submission Draft
Jones, Robin@Manchester
to:
planningpolicy@sthelens.gov.uk
12/03/2019 07:43

[redacted]

1 Attachment

St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,
Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd
10th Floor | One St Peters Square | Manchester | M2 3DE
[redacted]

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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

[redacted]

Date 12th March 2019

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

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

'Discharge of surface water to a public combined sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period. Any development proposal should demonstrate unfettered rights to discharge between various phases.'

(1)

With respect to the detailed design of new development sites, we would like to highlight the importance of careful consideration of site drainage in comparison with proposed finished floor levels. We recommend policies on the design of new make reference to the need for applicants to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer. This helps ensure new development is more resilient to the impacts of climate change and the potential for flooding from sewers. A possible policy is set out below.

(2)

'Applicants will be expected to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer.'

Draft Policy LPD02: Design and Layout of New Housing

We suggest emerging Policy LPD02 includes an additional clause to ensure water efficiency measures are fully considered in the design of new development. Below is an example of wording that we would recommend including within this policy:

'New residential developments will be required to:

'11. to demonstrate the site is drained in the most sustainable way, making use of topography, landscaping and ground conditions should encourage water efficiency measures including water saving and recycling measures to minimise water usage. A developer may be required to accommodate an element of open space for the discharge of surface water through the incorporation of sustainable drainage systems.'

(3)

'12. Demonstrate the new development has considered incorporating water efficiency measures as part of the design.'

United Utilities seeks to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

PO3693

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
[redacted]

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
[redacted]
indigo.

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RTPI Planning Consultancy of the Year 2017

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

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

Would you like to be kept updated of future stages of the St Helens Borough 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)		2017 Strategic Housing Land Availability Assessment							

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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

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

EL0200A.1.pdf

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

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3694

EL0258

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

SITE GBP_093_A

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

[redacted]

4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf

Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Neeeds Assessment.pdf

1 LPA05
2 LPA02
3 GBR
4 S.A.
5 S.O.4.1
6 S.O.5.1
7 LPA02 - PARA 3
8 LPA02 - PARA 4
9 LPA03
10 LPA04

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

11 LPA05 - PARA 3
12 LPA05 - PARA 4
13 APPENDIX 4
14 TABLE 4.6
15 LPA05.1
16 LPC02
17 LPC04
18 LPA07 - PARA 9, c)
19 LPA07, PARA 9
20 LPC10 - PARA 6

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

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21 LPA06
22 LPC01
23 LPC13 - PARA 4
24 LPD07
25 LPD02
26 LPD03.

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

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

[redacted]

1 Attachment

Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb
Associate Planner
Pegasus Group
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From: Graham Lamb
Sent: 13 March 2019 17:01
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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

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

[redacted]

1 Attachment

Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner
Pegasus Group
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Please consider the environment before printing this email message.

From: Graham Lamb
Sent: 13 March 2019 17:01
To: planningpolicy@sthelens.gov.uk
[redacted]
Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
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https://i.imgur.com/05aES4f.jpg

KW/GL/P17-0098/L004

13 March 2019

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

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

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.

- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.

- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

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

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

Yours sincerely,

[redacted]

Graham Lamb
Associate Planner
[redacted]

Encs.

APPENDIX 4.

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th March 2019

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

Pegasus Group

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

T 0161 393 3399 | **W** www.pegasuspg.co.uk

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for high speed electronic communication networks, and as such they should not be seeking any additional local technical standards over and above this requirement.

9.17 In respect of any off-site contributions, these do not appear to have been considered within the Viability Assessment which only factors in provision for cable and broadband ducting and doesn't mention contributions.

Policy LPD02: Design and Layout of New Housing

9.18 Redrow are supportive of this policy, as it does not seek to impose prescriptive separation distance standards which can often pose as a constraint to bringing development forward. Instead, it allows for a more flexible way forward and for design solutions which can still readily achieve adequate privacy and outlook standards without policy restrictions.

Policy LPD03: Open Space and Residential Development

9.19 This policy relates to open space standards and notes how the standards set out in Table 7.1 will be used to guide the type, quantity and quality of open space required. Whilst we have no particular comments on the contents of Table 7.1 at this stage, we would emphasise that any open space requirements will need to be justified by up to date evidence.

9.20 We therefore reserve the right to comment on the Council's future open space SPD at a later date (which is referred to in Table 7.1).

PO3695

SITE : FORMER LPA0 HS08

EL0289

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 1 of 4

Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

[redacted]

4 Attachments

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

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

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]
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1 - LPA05
2 - LPA02
3 - GBR
4 - S.A.
5 - S.O. 4.1
6 - S.O. 5.1
7 - LPA02 - PARA 3
8 - LPA02 - PARA 4
9 - LPA03
10 - LPA04
11 - LPA05 - PARA 3
12 - LPA05 - PARA 4
13 - APPENDIX 4
14 - TABLE 4.6
15 - LPA05.1
16 - LPA06
17 - LPC01
18 - LPC02
19 - LPC04
20 - LPA07 - PARA 3d
21 - LPA07 - PARA 9
22 - LPC10
23 - LPC13 - PARA 4
24 - LPD07
25 - LPD02
26 - LPD03

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 2 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:06

[redacted]

3 Attachments

Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf

Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

7 Attachments

Appendix 5-Agricultural Land Classification-Redrow.pdf

Appendix 6-Detailed Site Pro Forma-Redrow.pdf

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

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

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

Appendix 9c-Summary Supply Trajectory-Redrow.pdf

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

Email 3 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West- Email 4 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07

[redacted]

1 Attachment

Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

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

Pegasus Group

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

[redacted]

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for high speed electronic communication networks, and as such they should not be seeking any additional local technical standards over and above this requirement.

9.17 In respect of any off-site contributions, these do not appear to have been considered within the Viability Assessment which only factors in provision for cable and broadband ducting and doesn't mention contributions.

Policy LPD02 – Design and Layout of New Housing

9.18 Redrow are supportive of this policy, as it does not seek to impose prescriptive separation distance standards which can often pose as a constraint to bringing development forward. Instead, it allows for a more flexible way forward and for design solutions which can still readily achieve adequate privacy and outlook standards without policy restrictions.

Policy LPD03 – Open Space and Residential Development

9.19 This policy relates to open space standards and notes how the standards set out in Table 7.1 will be used to guide the type, quantity and quality of open space required. Whilst we have no particular comments on the contents of Table 7.1 at this stage, we would emphasise that any open space requirements will need to be justified by up to date evidence.

9.20 We therefore reserve the right to comment on the Council's future open space SPD at a later date (which is referred to in Table 7.1).

PO3696

Site: Former UPO HS23 EL0290

EL0290B.1.pdf

Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

3 Attachments

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

Appendix 1-Illustrative Masterplan-Wallace.pdf

Dear Sir/Madam,

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

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

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

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

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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1. LPA05
2. LPA02
3. GBR
4. SA
5. S.O.4.1
6. S.O.5.1
7. LPA02 - PARA 3
8. LPA02 - PARA 4
9. LPA03
10. LPA04
11. LPA05 - PARA 3
12. LPA05 - PARA 4
13. APPENDIX 4
14. LPA05 - TABLE 4.6
15. LPA05.1
16. LPA06
17. LPC01
18. LPC02
19. LPC04
20. LPA07 - PARA 3c)
21. LPA07 - PARA 9
22. LPC10
23. LPC13 - PARA 4
24. LPD07
25. LPD02
26. LPD03

Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

[redacted]

4 Attachments

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

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

Email 2 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Rebecca Dennis
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planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

1 Attachment

Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

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planningpolicy@sthelens.gov.uk
13/05/2019 16:14

[redacted]

2 Attachments

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

Email 4 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:15

[redacted]

1 Attachment

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

Email 5 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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13/05/2019 16:15

[redacted]

1 Attachment

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

Email 6 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[redacted]

7 Attachments

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

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

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

Appendix 8c-Summary Supply Trajectory-Wallace.pdf

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

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

Email 7 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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13/05/2019 16:16

[redacted]

1 Attachment

Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
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[redacted]

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ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

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

Pegasus Group

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

[redacted]

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9.17 In respect of any off-site contributions, these do not appear to have been considered within the Viability Assessment which only factors in provision for cable and broadband ducting and doesn't mention contributions.

Policy LPD02: Design and Layout of New Housing

9.18 Wallace are supportive of this policy, as it does not seek to impose prescriptive separation distance standards which can often pose a constraint on bringing development forward. Instead, it allows for a more flexible way forward and for design solutions which can still readily achieve adequate privacy and outlook standards without policy restrictions.

(25)

Policy LPD03: Open Space and Residential Development

9.19 This policy relates to open space standards and notes how the standards set out in Table 7.1 will be used to guide the type, quantity and quality of open space required. Whilst we have no particular comments on the contents of Table 7.1 at this stage, we would emphasise that any open space requirements will need to be justified by up to date evidence.

9.20 We therefore reserve the right to comment on the Council's future open space SPD at a later date (which is referred to in Table 7.1).

(26)

PO3697

EL0211

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

[redacted]

1 Attachment

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

Sir/Madam,

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

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

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

[redacted]

1 Attachr

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

Sir / Madam

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

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

https://we.tl/t-yDseY9rPfO

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

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy See cover letter		Paragraph / diagram / table See cover letter		Policies Map See cover letter		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

20.0 Policy LPD02: Design and Layout of New Housing

Introduction

20.1 Policy LPD02 sets out the design and layout of new housing required to achieve high standards of design and environmental sustainability, and provide a good standard of amenity for all existing and future occupants and those of neighbouring land and buildings.

Consideration of Policy

20.2 TW acknowledges the importance of ensuring that new developments are of high quality and that they respect the local vernacular and character of the surrounding area. TW supports the provision of LPD02 but notes that it is important that any policy requirements relating to amenity, design and layout of new development is in accordance with national policy and building regulations.

20.3 TW note that supporting guidance will be set out in an update to the New Residential Development SPD and reserve the right to comment on this at the appropriate time.

20.4 TW would note that in respect of Part 10, it has made representations on the effectiveness of Policy LPC01.

Tests of Soundness

20.5 TW considered Policy LPD02 to be generally sound.

Recommended Change

20.6 TW considers that no further change to the policy is required.

PO3698

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

[redacted]

1 Attachment

Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner

[redacted]

indigo.

RTPI Planning Consultancy of the Year 2017

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

[redacted]

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

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

Yes ☐ (Via Email) No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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FURTHER INFORMATION

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

NEXT STEPS

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

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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 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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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

Please see enclosed representation.

Please continue on a separate sheet if necessary

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Please see enclosed representation. 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 see enclosed representation.

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

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

indigo.

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

[redacted]

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

By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

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

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

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

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation. 01

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough. 02

Registered office: Indigo Planning Ltd, Allenbury House 10-15 Queen Street, London EC4N 1TX
Registered number: 2578663 VAT number: 449 4613 34

RTPI AWARDS FOR PLANNING EXCELLENCE WINNER 2017

indigo.

Policy LPD03: Open Space and Residential Development

We support the changes made to the policy wording and removal of the requirement for proposals over 40 unit to provide 40 sqm of open space per dwelling.

We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites. 36

Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis, leaving the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant. 37

Conclusion

The Florida Farm site represents an excellent development opportunity, building on its overall location and proximity to employment (both existing and planned) and broad range of services and facilities.

This submission reaffirms how, in technical terms, development can be accommodated and in many ways, deliver key environmental improvements in the area. Indeed, Barratt are keen to meet with the Local Planning Authority to agree a strategy and timetable for the preparation and submission of an application and delivery of the site.

We trust that the Council finds this information useful in continuing to put forward the Florida Farm site as a draft housing allocation, however, should you require any further information or wish to discuss matters further, please do not hesitate to contact us.

Yours faithfully

[redacted]

Nick Fillingham

cc: Barratt Homes

PO3699

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
[redacted]

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
[redacted]

indigo.

RTPI AWARDS FOR PLANNING EXCELLENCE COMMENDED 2018
RTPI NORTH WEST AWARDS FOR PLANNING EXCELLENCE CATEGORY WINNER 2018
insider RESIDENTIAL PROPERTY AWARDS 2019 WINNER

RTPI Planning Consultancy of the Year 2017

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

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St.Helens Council

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Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent Postcode:	Address: St James' Tower 7 Charlotte Street Manchester Postcode: M1 4DZ
Tel No:	[redacted]
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.

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

Yes ☒ (Via Email) No ☐

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

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Merseyside
WA10 1HP

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

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Telephone: 01744 676190

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

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Please refer to supporting representation report submitted alongside this form. Please continue on a separate sheet if necessary

Please note *your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	No, I do not wish to participate at the oral examination	✓	**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

EL0200A.1.pdf

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

4.58. We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.

Policy LPC13: Renewable and Low Carbon Energy Development

4.59. We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach.

Policy LPD01: Ensuring Quality Development

4.60. Murphy Group supports the provision of high quality development across their sites for housing development and therefore support ensuring quality development.

4.61. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

Policy LPD02: Design and Layout of New Housing

4.62. We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

Policy LPD03: Open Space and Residential Development

4.63. We support the changes made to the policy wording and removal of the requirement for proposals over 40 units to provide 40 sqm of open space per dwelling.

4.64. We welcome the reference made within the policy to allow the quantity, accessibility and quality of existing open space provision to be taken in to account when calculating the appropriate amount of open space to be provided on development sites.

4.65. Reference should be made in the policy to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.

Policy LPD06: Prominent Gateway Corridors

4.66. There is some overlap and conflict between the requirements of this draft policy and LPD02 (Design and Layout of New Housing). In our view it would be simpler if draft policy LPD06 simply identified the 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis.

4.67. This would leave the specific design requirements to policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.

PO3700

EL0211

RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of [redacted]

[redacted]

1 Attachment

41575_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,
Melissa

Melissa Wilson
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

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]. 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-yDseY9rPfO

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[redacted]

lichfields.uk

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.

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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2 [NLP-DMS.FID606600]
Brian O'Connor

[redacted]

1 Attachr

SPLIT 41874_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19_Part_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

https://we.tl/t-yDseY9rPfO

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards
Brian

Brian O'Connor
Associate Director
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[redacted]

lichfields.uk

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.

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St.Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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PART A – 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 Postcode: WA3 6GR	Address: Ship Canal House 98 King Street Manchester Postcode: M2 4WU
Tel No:	Tel No: [redacted]
Mobile No:	Mobile No:
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.

EL021

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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: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes X	No ☐
Sound?	Yes ☐	No X
Complies with the Duty to Cooperate	Yes X	No ☐

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: *Please read the Guidance note for explanations of the Tests of Soundness*	
Positively Prepared?	X
Justified?	X
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
See supporting Representations and Appendices

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
See supporting Representations and Appendices

Please note *your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
			Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

EL0211

St Helens Local Plan
Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8

21.0 Policy LPD03: Open Space and Residential Development

Introduction

21.1 Policy LPD03 sets out the open space requirements for new residential developments.

Consideration of Policy

21.2 TW acknowledges the need for new residential developments to make a contribution towards the provision of open space. TW broadly supports the provisions set out in Figure 7.1 identified in Part 2 of Policy LPD03 on account of its accordance with national guidance, namely the Outdoor Sport and Play – Fields in Trust standards; and, the identified typologies in accordance with the Green Infrastructure definition as set out in the Framework.

21.3 Furthermore, TW supports the inclusion of Part 3 of Policy LPD03 and the degree of flexibility that the Council has adopted whereby it will allow for off-site provision or financial contributions to be made where it can be demonstrated that this would be more suitable.

21.4 Notwithstanding this, it is important that any financial contribution made meets the test set out in the Framework[13] and avoids causing undue impact on the cost of delivering units.

Tests of Soundness

21.5 TW considered Policy LPD03 to be sound.

Recommended Change

21.6 TW considers that no further change to the policy is required.

[13] The Framework 2019 - §56