ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

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PO3701 – PO3800

SEPTEMBER 2020

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PO3701

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

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3 GBR
4 S.A.
5 S.0.4.1
6 S.0.5.1
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.

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16 LPC02
17 LPC04
18 LPA07 - PARA 3, c)
19 LPA07, PARA 9
20 LPC10 - PARA 6

Thanks and kind regards,

Graham Lamb
Associate Planner

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25 LPD02
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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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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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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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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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Pegasus Group

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

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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).

PO3702

SITE : FORMER LPPO 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

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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
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(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

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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

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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

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

ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

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

Pegasus Group

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9.17 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).

PO3703

Site: Former LPO 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
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

1 LPA05
2 LPA02
3 GBR
4 SA
5 S.0.4.1
6 S.0.5.1
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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Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8
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

Pegasus Group
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8
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
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
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[redacted]

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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
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

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

Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8
Rebecca Dennis
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.

Rebecca Dennis
Principal Planner

Pegasus Group
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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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https://i.imgur.com/ZuAcceY.jpg

https://i.imgur.com/iHET88g.jpg

Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:16

[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 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]

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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Live: 45457800 v 3

The Council should also note that Part R of the Building Regulations sets the appropriate standards 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 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. 26

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).

PO3704

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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EL0200A 2.pdf

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. 39

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. 40

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. 41

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. 42

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. 43

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. 44

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. 45

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.

PO3705

EF0043

St.Helens Borough Local Plan 2020-2035: Submission Draft
Victoria Vernon
to:
planningpolicy@sthelens.gov.uk
12/03/2019 15:37
Hide Details

[redacted]

1 Attachment

SP_19_00000483_St Helens LP_lpsd-representation-form..doc

① - LPA05.1
② - LPA09
③ - LPC05
④ - LPD03
⑤ - LPA03

Dear [redacted]

Please find attached Sport England's comments to the above consultation,

Kind regards,

Victoria Vernon **BSc (Hons) MA**
Trainee Planner
[redacted]

RTPI AWARDS FOR PLANNING EXCELLENCE FINALIST 2019

This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our website, and our Data Protection Officer can be contacted by emailing Erin Stephens

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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: Mrs	Title:
First Name: Victoria	First name:
Last Name: Vernon	Last Name:
Organisation/company: Sport England	Organisation/company:
Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester, Postcode: LE11 3QF	Address: Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 11/03/19

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

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

Yes ☐ (Via Email)	No ☐

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

RETURN DETAILS

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

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

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

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

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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.

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 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?	☐
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

LAP05.1 – Sport England supports the removal of 7HA & 13HA from the Local Plan. However, it has also come to light that further sites allocated are not policy compliant. Both 2HA and 10HA include land that is defined as playing field.
An objection is made to these allocations as they would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. While the Council may have plans to relocate the facilities on both

1

sites as part of the developments this has not been clarified in the policy and no replacement sites have been identified. The loss of the facilities without replacement has not been justified by the Council's evidence base which demonstrates the sites are not surplus to requirements. As these sites contain important sports facilities which serve the community in the area, the loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF.

Consequently, at this stage, Sport England would object to the potential allocation of this sites for residential unless (in accordance with Government policy) off-site replacement playing field provision was made to mitigate the impact through confirmation in the policy that the facilities will be replaced with equivalent or better replacement facilities in terms of quantity and quality prior to commencement of development and the proposed replacement sites are identified in the pan to provide certainty.

The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date should these sites remain allocated for development which may affect the delivery of the allocation, it is advised that discussions take place with Sport England before this site allocation is confirmed in the submission version of the Local Plan. Further advice can be provided on how our concerns could be potentially addressed as well as advice on how to avoid some of the problems experienced by other local authorities who have allocated playing fields for development in their local plans.

LPA09 – This policy refers to the councils Green Infrastructure provision.

Para 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the council's evidence base. The council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the councils open space study 2016 concluded that there is sufficient quantity of open space.

This part of the policy also provides a link to the open space standards in policy LPC05. However, policy LPC05 quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As Green Infrastructure includes playing fields it is important that policy LPA09 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

LPC05 - Table 7.1 referred to in policy LPC05 (part 2) quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

As stated above, local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space

LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space. 4

Please continue on a separate sheet if necessary

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

LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.
https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/ 5

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.
https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy. 1

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities." 2

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want 3

to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities." 3

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth. 4

Please continue on a separate sheet if necessary

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

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

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

PO3706

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.

EF0078A.pdf

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

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

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

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

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

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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.*
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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 see enclosed representation.

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

EF0078A.pdf

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, Aldermary House, 10 - 15 Queen Street, London, EC4N 1TX
Registered number: 2078863 VAT number: 449246134

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

Nick Fillingham

cc: Barratt Homes

PO3707

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

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St.Helens Council

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

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.*
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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. 39

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. 40

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. 41

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. 42

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. 43

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. 44

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. 45

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.

PO3708

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	6 Pike House Road Eccleston st Helens WA10 5JY
Agent Details	

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

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

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

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.
The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is n 204.6 hectors. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. 01
Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS) 02
The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately, 01
The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use. 03

So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again. 03

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology.
The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required. 01
The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).
The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework. 04
Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities. 06

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars. 04

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car. 06
The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring. 04

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

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

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

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

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

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

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

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

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

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

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

PO3709

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)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: C/O Agent	Title: Miss
First Name: C/O Agent	First name: Alice
Last Name: C/O Agent	Last Name: Fitton
Organisation/company: Harworth Estates Ltd	Organisation/company: Turley
Address: C/O Agent Postcode:	Address: 1 New York Street, Manchester Postcode: M1 4HD

[redacted]

Signature: [redacted] **Date:** 11/03/2019

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

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

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

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St.Helens** **Merseyside** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)
or by e-mail to:	planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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	LPD07	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?	☐
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 supporting Representations Report

Please continue on a separate sheet if necessary

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

Please see supporting Representations Report

Please continue on a separate sheet if necessary

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

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

	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:

EL0074

To explain further the rationale behind the representations and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

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

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

LL0074

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

LL0074

3.19 Similarly, Harworth generally supports the principle of providing the latest generation of information and digital communication networks, as sought within emerging **Policy LPD07 'Digital Communications'**. However, this should not form a mandatory requirement for every development site given that the infrastructure and services available will vary significantly for sites across the whole borough.

Summary

3.20 Harworth supports the proposed allocation for residential development at Moss Nook Urban Village and it is encouraging that development of this land will contribute towards the borough's spatial vision, by encouraging effective use of brownfield land to help meet the borough's development needs.

3.21 There are conditions attached to the extant planning permission for the site which will ensure the development is delivered in accordance with the development principles established by the Council.

3.22 To ensure the emerging Plan is sound, Harworth has provided several recommendations for where the emerging policies could be amended, for example, those that define specific requirements for the density of development, housing mix, and the provision of affordable housing; all of which should form more positively prepared policies, to ensure that the proposed technical requirements do not result in a suitable development site becoming unviable and subsequently undeliverable.

PO3710

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]

(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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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).

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

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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

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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.

1

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

development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks. It is not considered appropriate for St Helens to seek additional local technical standards over and above this requirement. (14)

Future Engagement

I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.

Yours sincerely,

Joanne Harding
Local Plans Manager – North
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229

PO3711

EL0211

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

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.

EL0211

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

22.0 Policy LPD07: Digital Communications

Introduction

22.1 Policy LPD07 sets out the requirement for housing and employment development to make provision for the latest generation of information and digital communication networks.

Consideration of Policy

22.2 TW considers that digital infrastructure is an important part of the integrated development within an area. Whilst §112 of the Framework establishes that local authorities should seek to support the expansion of electronic communications network it does not seek to prevent development that does not have access to such networks.

22.3 Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic networks. TW do not consider there to be justification for St Helens to seek additional local technical standards above this requirement.

22.4 Any developer contribution would need to be fully viability tested.

29

Tests of Soundness

22.5 TW considers that Policy LPD07 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 Framework or Building Regulations.

Recommended Change

22.6 In order to address the conflicts above and ensure that Policy LPD07 is sound it should omit reference to development making provision for digital communications as part of the policy requirement.

PO3712

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.0.4.1
6 S.0.5.1
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 3, 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

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

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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[redacted]

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

[redacted]

1 Attachment

Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner
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Please consider the environment before printing this email message.

From: Graham Lamb
Sent: 13 March 2019 17:01
To: planningpolicy@sthelens.gov.uk
[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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Suite 4b | 113 Portland Street | Manchester | M1 6DW

[redacted]

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

Pegasus Group

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

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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.

22

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.

23

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.

24

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

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).

PO3713

SITE : FORMER LPPO 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
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

[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

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7 Attachments

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

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

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

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

Appendix 9c-Summary Supply Trajectory-Redrow.pdf

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

Email 3 of 4 of Redrow representations.

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1 Attachment

Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

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Principal Planner

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Graham
Last Name:	Last Name: Lamb
Organisation/company: Redrow Homes North West	Organisation/company: Pegasus Group
Address: 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:

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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

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	LDP07	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
REDROW OBJECT TO THIS POLICY WHICH SUGGESTS THAT CONTRIBUTIONS MAY BE SOUGHT FROM DEVELOPERS TOWARDS THE COST OF PROVIDING OFF-SITE BROADBAND INFRASTRUCTURE. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL GROUNDS OF OBJECTION.

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

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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.

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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.

23

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.

24

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

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).

PO3714

Site: Former LPO 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

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[redacted]

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1 LPA05
2 LPA02
3 GBR
4 SA
5 S.0.4.1
6 S.0.5.1
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

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4 Attachments

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

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

Email 2 of 8 of Wallace representations.

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Principal Planner

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1 Attachment

Appendix 2 Part 5-LVIA-Wallace.pdf

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2 Attachments

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

Email 4 of 8 of Wallace representations.

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

Email 6 of 8 of Wallace representations.

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7 Attachments

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Email 7 of 8 of Wallace representations.

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Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

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St.Helens Council

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Representation (i.e. Comment) Form

Ref: LPSD

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

PART A – YOUR DETAILS

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

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

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

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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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NEXT STEPS

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DATA PROTECTION

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

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	LDP07	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

WALLACE OBJECT TO THIS POLICY WHICH SUGGESTS THAT CONTRIBUTIONS MAY BE SOUGHT FROM DEVELOPERS TOWARDS THE COST OF PROVIDING OFF-SITE BROADBAND INFRASTRUCTURE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL GROUNDS OF OBJECTION.

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

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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]

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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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.

The Council should also note that Part R of the Building Regulations sets the appropriate standards 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 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. 26

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).

PO3715

①-LPA02 ②-LPA04 ③-LPA07 ④-LPA06 WF0183.pdf
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. 04
If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road. 05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times. 03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.
At moment at least the water is near the farm land and does not always spread across the road.
If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented. 06
The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased. 07

7. Please set out modification(s) you consider are necessary
The council should not consider removing this land from green belt or open spaces to place in safe guarding.
I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
No, I do not wish to participate at the oral examination

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

Response Date	3/12/2019 3:02:20 PM

PO3716

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]

Sing

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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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.

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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

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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					

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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)
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Please continue on a separate sheet if necessary

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Please see documents:

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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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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 LPD09 Sites 78A & 88A

Policy LPD09 Sites 78A & 88A

8.25 Policy LPD09: Air Quality

23

23

Policy LPD09: Air Quality

1. Development proposals must demonstrate that they will not:
   a) impede the achievement of any objective(s) or measure(s) set out in an Air Quality Management Area (AQMA) Action Plan; or
   b) introduce a significant new source of any air pollutant, or new development whose users or occupiers would be particularly susceptible to air pollution, within an AQMA; or
   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
   d) having regard to established local and national standards, lead to an unacceptable decline in air quality in any area.
2. Major development schemes should demonstrably promote a shift to the use of sustainable modes of transport to minimise the impact of vehicle emissions on air quality.
3. New development that would result in increased traffic flows on the M62 past Manchester Mosses Special Area of Conservation (SAC) of more than 1000 vehicles per day or 200 Heavy Goods Vehicles (HGVs) per day must be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on ecological interests within the SAC. Where such effects are identified they would need to be considered in accordance with Policy LPC06.

8.27 Reasoned Justification

8.27.1 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor, for example, in the onset of heart disease and cancer and particularly affects vulnerable groups such as children and older people, and those with heart and lung conditions. Mortality rates in St.Helens Borough for cardiovascular and respiratory diseases are significantly higher than the national average.

23

23

8.27.2 There is a strong correlation with equalities issues, as many of the less affluent areas have poor air quality. Air quality can also affect biodiversity and thereby impact on legal obligations under the Conservation of Habitats and Species Regulations 2017.

8.27.3 Part IV of the Environment Act 1995 requires local authorities to regularly monitor levels of seven key pollutants against national standards set by the Air Quality (England) Regulations 2000 (as amended). St.Helens Council complies fully with these duties and works closely with other local authorities to protect air quality. The Council must designate an Air Quality Management Area (AQMA) where air

pollution exceeds or is likely to exceed an air quality objective.
8.27.4 Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.Helens Borough as follows:

- M6 AQMA includes a strip of land either side of the M6 motorway;
- High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;
- Borough Road AQMA includes Borough Road, St.Helens between its junctions with Westfield Street and Prescot Road; and
- Linkway Reflection Court, located off Linkway West, St.Helens.

8.27.5 Further guidance and links to the AQMAs maps can be found on the Council's website at: https://www.sthelens.gov.uk/business/environmentalhealth/environmental-protection/air-quality/
8.27.6 Action to protect and improve air quality will be undertaken by requiring all planning applications to be accompanied by suitable mitigation measures where necessary. These may include for example requiring proposals that would generate additional traffic to include new Electric Vehicle Charging Points. All proposals for new development that could give rise to significant amounts of traffic must include information on any increase in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases.
8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. Any significant effects would need to be addressed in line with Policy LPC06.

Comments
The air quality has been covered in previous policies. But with respect to B8 warehousing and in particular 7EA and 8EA no measures have been shown in policy LPD09 to circumvent the impact of the Local Roads due to the indirect access to the motorway M6 network that will add to the already AQMA recorded levels. Currently and hence the future 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

23 are important issues for the government has brought forward to address Air Quality. Whereas STC with all the B8 warehousing proposed is failing what the government and what the local people need – clean air. The SHC B8 warehouse program will impose commercial traffic pollution upon the local people and their children not just for now, for if the B8 (including 7EA and 8EA) warehousing are built SHC intend from what they have written to impose these pollution levels from 2035 and beyond. This the Local People do not accept – as the proposed St Helens Local Plan Submission Draft January 2019 is not a platform for local people to shape their surroundings. 23

PO3717

ELO117

Representations concerning the St Helens Borough Local Plan 2020-2035 SPIC 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)

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?

9 & 2

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.

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.

10

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.

PO3718

ELO/65

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

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.

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.

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

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

PO3719

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]

Sing

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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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)

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
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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

But Parkside east according to the Green Belt figure is 64.55Ha, so what happened to the rest?

Due to the SHC adjudicating the local plan for themselves in order as also being the developer of Parkside East and west, I put it in as it is to let the inspector sort it out.

04

04

Recommendation by Local People and PAG
Green Belt at 7EA and 8EA

The effect of the uncertainty of the sizes as shown above for sites 7EA Parkside east and 8EA Parkside West. These area are embedded in many other areas where the precise information is required to analyse how 7EA and 8EA are incorporated in to other polices. Due to the missing information, the analysis of these other policies make the Local People unable to accept and makes the St Helens Local Plan Submission Draft January 2019, not legally compliant.

But as it stands the Local People can not accept this as a platform to shape their surroundings (NPPF paragraph 15), and will in all event restrict any development on both Parkside East and Parkside west (NPPF paragraph 11b)i) that does not follow Local People's Policy LOCAL 10LP.

24

24
LPA10
Sites
7EA &
8EA

c. ii. Nationally Significant Infrastructure Project

The Proposed design proposed by SHC as joint owner/developer of Parkside east and Parkside west has been mirrored by SHC in the St Helens Local Plan Submission Draft January 2019, just in order to satisfy SHC needs as (developer) over and above the needs of the Local People, despite the NPPF policy: a platform for local people to share their surroundings. But the NPPF gives the Local People the final say not SHC. SHC in 2012 proposed Policy CAS 3.2 as a Nationally Significant Infrastructure Project to the inspector. The inspector agreed to the various points that must be satisfied to develop the Parkside west and Parkside east, to which SHC agreed by adopting the said policy. But what SHC as developer solely and jointly and as a council has proposed as the development that SHC want on Parkside east and Parkside west fails to follow policy CAS 3.2 as shown:

(The areas in 'highlight' are the points in the policy that SHC has not complied to. By not complying to does not make the policy not up-to-date, it is SHC are trying to change Policy CAS 3.2 to suit their needs and not the local people. The text in 'red' show points of contention and text with 'strikethough' show option chosen)

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery

24

24

The site of the former Parkside Colliery and immediately adjacent land is identified as a strategic location which has the potential to facilitate the transfer of freight between road and rail. The Council supports in principle the delivery of a SRFI in this location.

24 The Council believes a deliverable and viable SRFI can be developed on the western side of the M6 with an operational area of approximately 85 hectares, as shown indicatively on Figure 9.2. 24

The Council will support the development of the site identified to the west of the M6 as a SRFI, provided that each of the following criteria are met:

1. It meets national Green Belt planning policy tests, including the demonstration of very special circumstances;
2. Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. Adverse impacts on the Strategic Road Network will be mitigated;
3. Direct access to the rail network is achieved and conforms with rail industry strategies and capacity utilisation;
4. The ability of the local road network to accommodate traffic generated by the development without unacceptable impact on residential amenity and traffic flows;
5. Measures are incorporated which encourage travel to/from the site using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy CP 2. A travel plan will be essential;
6. That the character and amenity of the Newton High Street and Willow Park Conservation Areas are preserved or enhanced;
7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;
8. All uses within the site should have the primary purpose of facilitating the movement of freight by rail. Any ancillary uses to this main use must be directly related to the movement of freight by rail and must demonstrate clearly why they need to be located on the site;
9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting; 24 24
10. Provision for the positive management of existing and new environmental assets;
11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. ~~Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required~~

24

~~including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St.Helens local authority area~~; 24

12. Training schemes will be put in place to increase the opportunity for the local population to obtain employment at the complex; and
13. All other material issues are satisfied.

It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. The Council will also support the development of land to the east of the M6 provided the above criteria are met, plus the following additional criteria:

14. That the area of land to the western side of the M6 is developed first; and
15. That the SRFI is proven to be not deliverable without the additional eastern land area.

Planning permission will not be granted for any other use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange.

Subject to a SRFI being fully developed on site, that meets the requirements listed above, the Council will consider favourably a revision to the Green Belt boundary in the Allocations DPD and Proposals Map, or subsequent revision.

(For Figure 9.2 see Map 1)

Question:
Is Policy CAS 3.2 up-to-date to warrant the proposed scheme of Phase 1, Phase 2, Phase 3(SRFI) and the in-direct Parkside Link Road (PLR) to the motorway M6?

One thing from Policy CAS 3.2 is point 11 regarding Newton Park Farm. This point is the crux to the whole interpretation of the development of Parkside east and Parkside west. This point has two scenarios Retain in situ or remove? SHC have decided to Retain in situ so the remove becomes not applicable.

The proposed plan devised by SHC as clearly shown in LPSD7EA and LPSD8EA maps which confirms the Phase 1 masterplan(s) development plan all show the "Newton Park Farm Complex" has been retain with the SRFI rail spur line circumventing the complex. 24 24

BUT, in order to do so, the Phase 3 (SRFI) is brought in to be an integral part of the Phase 1 application as shown in the masterplan(s) and brings the Phase 1, Phase 2, Phase3 SRFI) and PLR to be a major project all due to having to remove the Newton Park Farm Complex access (transport and utilities) via Newton Park Drive to the A49 Mill Road, to be altered via a new access junction, via the Phase 1, Phase 2 and PLR road network to the A49 Winwick Road. This declared change proves without a doubt that the Phase 3 (SRFI) to an integral part of the Phase I application as shown in the masterplan(s). This revelation in the masterplan can not be changed as the masterplan(s) are confirmed to be in the Environmental Statement February 2018 and the Environmental Statement January 2019.

Thus confirming Phase 1 is a part of the SRFI. This means the whole Project Phase 1, Phase 2, Phase3(SRFI) and PLR must be under the Major Infrastructure Unit of the Planning Inspectorate under the Planning Act 2008 and not a part of NPPF, as stated in the NPPF paragraph 5.

Conclusions

So all references to Parkside East and Parkside West, especially GBP_039 and GBP_041 (That is to say, the removal of Parkside east and Parkside west from Green Belt is a planning concern of the Major Infrastructure Unit of the Planning Inspectorate under the Planning Act 2008), must be removed from the St Helens Local Plan Submission Draft January 2019.

c. iii. The proof that Phase 1, Phase 2, Phase 3 (SRFI) and the Parkside Link Road (PLR) are one whole project

Phase 1 has incorporated Phase 2 and looking to have a decision made jointly as there is so much of Phase 2 in the so called phase 1 application. But the give away from the Phase 1 masterplan(s) that links all three phases together Phase 1 Phase 2 and Phase3 (SRFI) is the Newton Park Farm Complex road removal for the SRFI rail spur and the new access junction on to the Phase 1, 2 and PLR area. By putting in the Newton Park Farm access alterations in order for the SRFI section to work in Phase 1, automatically links all together. Especially in Appendix 5 8EA states:

> *"The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map."*

24 24

"future development of siding facilities" - facilities is more than just the rail this indicates future loading and unloading facilities that have been added as a probable extension on Parkside west, next to the new road area that shows the rail area widens out. This would enable the Phase 1 and Phase 2 to have a rail served area as well as A49 HGV containers and would reduce the on-site transport costs. The loaded/empty wagons could be shunted back and forth to Parkside east SRFI to assemble the trains lengths.

As well as the Phase 1 application masterplan(s) show that the Newton Park Drive has been removed to accommodate the Phase 3 (SRFI) rail spur line, making the Newton Park Farm Complex access for transportation and utilities effectively cut-off. In cutting-off this road access to Newton Park Farm, in doing so: The Phase 1 masterplan(s) has by default proven and shown that the Phase 1 application incorporates the Phase 3 (SRFI). The Phase 1 masterplan(s) goes even further to confirm the incorporation in the Phase 1 masterplan(s) by creating a new access junction for transportation and utilities to the Phase 1, Phase 2 and Parkside Link Road. This new junction means in order for the Phase 3 (SRFI) to exist, the centuries old access to Newton Park Farm via Newton Park Farm has to be removed for the Phase 3 (SRFI) to work and to facilitate the ability for the Phase 3 (SRFI) to come forward a new junction from Newton Park Farm becomes reliant

24 24

upon a newly created access just to satisfy the Phase 3 (SRFI) as detailed in the Phase 1 application. This confirms that Phase 1, Phase 2 Phase 3(SRFI) and the PLR are all part s of a much larger project as detailed in policy CAS 3.2. and not the proposed 7EA, 8EA, LPA10 and the other associated policies.

Policy LPA10 paragraph 4.36.13 states:

> *"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."*

This means NPPF Introduction paragraph 5 states:

> *"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications."*

This confirms that Phase 3 (SRFI) is a 'nationally significant' under the Planning Act 2008", and as the Newton Park Farm Complex shown above confirms the SRFI is a part of the Phase 1 application and as the full environmental statement under the directive 2014/52/EU has not been assessed for the whole project.

Conclusion:

24 The applications that the developer SHC and the venture Group (SHC and Langtree plc) has put forward, the Phase 1 application and the PLR applications, MUST be withdrawn, then if they so desire place the whole project before the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision. 24

This means that Policy CAS 3.2 must be followed and not the St Helens Local Plan Submission Draft January 2019 policies.

So as it stands the Local People can not accept this as a platform to shape their surroundings (NPPF paragraph 15), and will in all event restrict any development on both Parkside east and Parkside west (NPPF paragraph 11b)i) that does not follow Local People's Policy LOCAL10LP.

d. Listed buildings

Newton Park Farmhouse and Barn

24 The information discovered in the Phase 1 masterplan(s) shows that the designated Heritage Assets Listed Buildings, known as Newton Park Farmhouse Grade II Listed Building and Newton Park Farm Barn Grade II Listed Building, together with other non-designated dwellings located in what can be stated as the Newton Park farm Complex, are affected by the proposed Phase 3 SRFI Rail Spur line. So much so that the Phase 1 masterplan(s) shows the access road along Newton Park Drive has been removed to accommodate the Rail Spur line and that a new access road and utilities junction is reliant on the Phase 1 from drainage via Phase 2 and other utilities and the reliance on the Parkside Link Road as a new access, all due to the Phase 3 (SRFI). 24

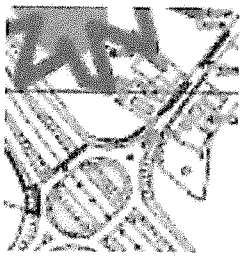
With this additional information shown by the applicant SHC and Langtree Plc, it clearly shows that the project has been split in to smaller developments, The alteration of the Newton park Farm Complex as shown in the Phase 1 masterplan(s) proves the whole project consists of Phase 1 and must be considered as a whole, otherwise it fails to follow national policies as well as Directive 2011/92/EU, article 2 (1).

12 **e. Transport** 12 LPA10 Sites 7EA & 8EA

The map Figure 9.2 (see Map 1) shows the location of the intended motorway junction on the M6 as stated in Policy CAS 3.2 in point 2:
(2) *"Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan". As shown:*

Indicative Location of New or Revised Motorway Junction

But the SRFI that actually has been proposed by SHC as the Parkside Link Road (PLR) applicant is an indirect access to the M6, in direct conflict with their (SHC) current adopted Local Plan 2012 Policy CAS 3.2 point 2. The actual location of the access to the M6 is in one approach, via the in-direct route the local road A579 Winwick Lane access to the existing M6 Junction 22 at the location:



12 Another approach to the motorway network is via the in-direct route A49 Winwick Road, where two directions can be taken one to the north via the local road A49 through Newton High Street to the M6 Junction 23, and one to the south via the local road A49 through the town of Winwick to either: via the local road Winwick Link Road to the M6 Junction 22; or via the local road A49 to the M62 junction 9. 12

24 4.36.13 The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008. 24

Comments

24 This proves as the Newton Park Farm Complex on Parkside West access via Newton Park Drive is shown to be required by the Phase SRFI, by having been removed in the Phase 1 masterplan(s) and a new transport access and utilities access from the Newton Park Farm Complex links and is dependant on the Phase 1,Phase 2 and the Parkside Link Road (PLR) in order. Then the action of ding this planning alteration means that the SRFI Rail Spur line being a part of the 60Ha threshold of a SRFI use as stated in paragraph 4.36.13 then Newton Park Farm alteration to accommodate the SRFI Rail Spur in order for the Planning Act 2008 to perform an environmental Statement under the Directive 2014/52/EU the phases: Phase 1 Phase 2 and the PLR are a part of the Nationally significant Infrastructure Project under the said Act. 24

Policy LPA 10 7EA - 8EA

Justification for removing Site7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016). 15 15

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

15 4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site. 15

Comments

(red text in 4.36.16 above to emphasise reasoning)

As there is no policy for 8EA then the policy for 8EA is Policy CAS 3.2 and as 8EA has no SRFI fully developed, does not comply with CAS 3.2. In fact, neither 7 EA or 8EA comply with CAS 3.2 then according to CAS 3.2 with respect to Green Belt the exceptional

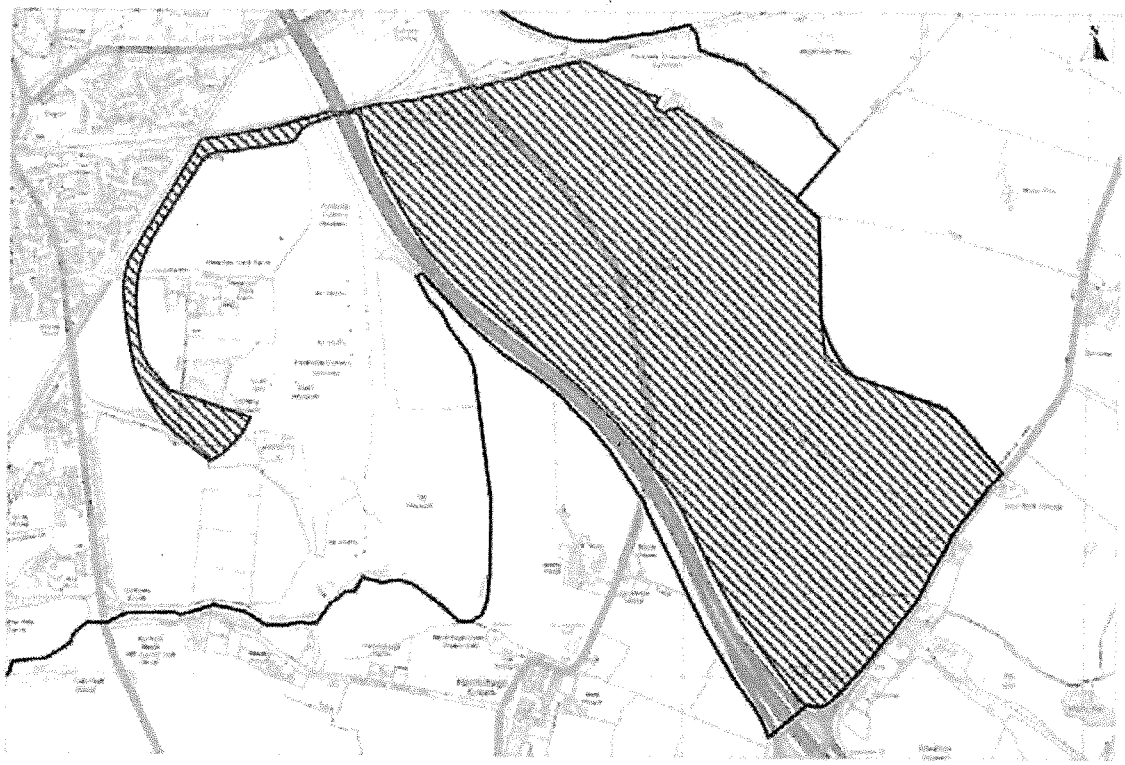
Policy LPD10 Sites 7EA & 8EA

Appendix 5: Site Profiles – Allocated Housing and Employment Sites

24 The document containing Appendix 5 refers to the two site used in the main St Helens Local Plan Submission Draft January 2019 document 7EA and 8EA as follows: 24

LPSD 7EA – Parkside East

LPSD Ref:	7EA - Parkside East, Newton-le-Willows	Ward:	Newton
Notional Capacity:	64.55ha	Designation:	Allocate



Requirements:

- See Policy LPA10

Comments

24 This area as shown in LPSD 7EA – Parkside West definitively shows "sidings facilities" or a "Rail Spur Line" to be an integral part for the operation of 7EA coming forward, as a nationally significant SRFI. Without this Rail Spur Line the already announced design layout being an integral part of the SHC LPA application P/2018/0048/OUP, known as Phase 1 and the planning applications: SHC LPA P/2018/0249/FUL and WBC LPA 2018/32514, known as Parkside Link Road (PLR) which all used the Local Plan 2012 Policy CAS 3.2 behind the reasoning for the application(s).The details of Phase 1 and part 24

of the PLR together with the future Phase 2 are detailed in the Phase 1submitted mastrerplan(s) including the Rail Spur Line. This Rail Spur Line is stated as a bullet point in LPSD 8EA:

> *"The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map."*

Together with this Rail Spur Line located on the Parkside west (8EA) area, the Parkside east (7EA) area has been categorically stated in paragraph 4.36.13 as being

> *"The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008."*

24 Conclusions 24

This proves as the Newton Park Farm Complex on Parkside West access via Newton Park Drive is shown to be required by the Phase SRFI, by having been removed in the Phase 1 masterplan(s) and a new transport access and utilities access from the Newton Park Farm Complex links and is dependant on the Phase 1,Phase 2 and the Parkside Link Road (PLR) in order. Then the action of ding this planning alteration means that the SRFI Rail Spur line being a part of the 60Ha threshold of a SRFI use as stated in paragraph 4.36.13 then Newton Park Farm alteration to accommodate the SRFI Rail Spur in order for the Planning Act 2008 to perform an environmental Statement under the Directive 2014/52/EU the phases: Phase 1 Phase 2 and the PLR are a part of the Nationally significant Infrastructure Project under the said Act.

25 removed or changed to prevent other facilities only the track facility (singular). But the Local People do not see LPSD8EA as a feasible platform to shape their surroundings the Local People see Policy LOCAL 10LP as their preferred policy. 25

Justification for removing Site7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site. 24

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Table 5.1: Parcels/sub-parcels – overall score at Stage 3 for employment use

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Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (hectares)
GBP_031a	Florida Farm North, Slag Lane, Haydock	Medium	Good	5	36.67ha
GBP_031b	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	Medium	Good	5	20.58ha
GBP_031c	Land to the west of Haydock Industrial Estate, Haydock	Medium	Good	5	7.75ha
GBP_032	Land to the east of Haydock Industrial Estate and to the west of M6 (north and south of Penny Lane), Haydock	Medium	Good	5	13.21ha
GBP_033	Land to the east of M6 Junction 23, Haydock	High	Good	3	55.90
GBP_036	Land south of A580 East Lancashire Road and south east of M6 Junction 23, Haydock	High	Limited	1	73.4ha
GBP_039	Parkside East, Newton-le-Willows	High+	Good	3	64.55ha
GBP_040	Land west of M6 and south of A572 Southworth Road, Newton-le-Willows	Low	Limited	4	4.3ha
GBP_041	Parkside West, Newton-le-Willows	Medium	Good	5	79.57ha
GBP_075d	Land north of M62 and south of Gorsey Lane, Bold	Medium	Limited	3	32.21ha

4.6 Known as 'Parkside East' and 'Parkside West', parcels GBP_039 (land east of M6 and north of A579 Winwick Lane) along with parcel GBP_041, form part of a wider site straddling the M6. This area is uniquely placed for the potential future development of rail enabled employment uses, having potential direct access to both the West Coast Mainline and the Chat Moss east-west rail lines and to the M6 close to its junction with the M62. There is a long standing history of developer interest in bringing parcels GBP_039 and GBP_041 - the former Parkside Colliery forward for development and the area was highlighted as a potential location for an inter-modal freight terminal in the now revoked North West Regional Spatial Strategy. Policy CAS3.2 of the St.Helens Core Strategy (adopted in 2012) identifies the site as a 'strategic location' for a SRFI. In 2016 the Parkside Logistics and Rail Freight Interchange Study identified Parkside as a site of national and regional significance in relation to relevant policy, market demand and need for the delivery of new and improved SRFIs. The Study found that the opportunities for rail access from the site are second to none in the North West. Consequently, whilst it is acknowledged that there would be a high impact on

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24 *the Green Belt if Parcel GBP_039 were to be developed, taking into consideration all the above factors, there are exceptional circumstances to justify carrying the parcel forward to the Stage 2 assessment.* 24

The following 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.

Comments
This has been shown to be a concern of the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision under the Planning Act 2008. So the parcels GBP_039 along with parcel GBP_041must be removed from the St Helens Local Plan Submission Draft January 2019

5. Overall Conclusion for Objections

Based on the previous conclusions the overall conclusion is that the above applications for Parkside east and west associated policies referred to in the St Helens Local Plan Submission Draft January 2019 must be removed as the are not sound and not justified. According to the NPPF paragraph 5, the said applications must be considered by the Major Infrastructure Unit of the Planning Inspectorate for Ministerial decision under the Planning Act 2008. 24 24

PO3720

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3721

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
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Paragraph / diagram / table	
Policies Map	
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Other documents	

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

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

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

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The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3722

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3723

Representor Details

Web Reference Number	WF0050
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking Surrey GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

POSITIVELY PREPARED

Parts 3 (b) and 4 are negative in their implication that all hot food takeaways have an impact on overweight and obesity beyond that of the variety of other use classes from and at which food and drink of high energy density or poor nutritional value is often sold. Conversely, not all hot food takeaways do sell such food and focussing on them is unfair, contradicts draft Policy LPA11 Part 4, and is unhelpful in removing incentives to reformulate or to offer a wider range of healthier options. Parts 3 (b) and 4 are not based on any objectively assessed development requirement. They effectively assess the requirement for hot food takeaways within 400 metres of the boundary of a school as zero, but do so without evidence of either a link between childhood obesity incidence and the proximity of hot food takeaways to schools or of a distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

Parts 3 (b) and 4 set a distance that could have the effect of banning hot food takeaways from large areas of the Borough. Because no assessment has been made of the number that might be refused as a result or what the social, economic or environmental impacts (e.g. reduced access to local facilities, investment, jobs and journey lengths) of that might be, it is not possible to balance these impacts. 01

JUSTIFIED

There is no strong or consistent evidence either for hot food takeaways having an impact on overweight and obesity beyond that of other use classes from and at which food and drink is sold or for a link between the incidence of overweight and obesity and proximity to schools.

The inclusion of primary schools is particularly problematic, as it is clear that primary pupils are not usually permitted to leave the premises at lunchtime and are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility of parents or guardians. 02

EFFECTIVE

Not all hot food takeaways sell food and drink of high energy density or poor nutritional value, which is available from a variety of uses within other Classes, so that focussing on hot food takeaways is not only unfair, but will actively remove incentives to offer a wider range of healthier options and to reformulate existing offers.

A further difficulty of using simple distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400-metre walk away.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 03

The lack even of any potential mechanism for, let alone strong or consistent evidence of, a link between proximity to primary schools and incidence of overweight and obesity amongst pupils at those schools, means that refusing permission within 400 metres of a primary school could never be effective.

It is unclear how the effectiveness of these parts of the policy would be monitored: Would negative outcomes result in changing the thresholds or distances?

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been had to national policy and advice in preparing Parts 3 (b) and 4 of the Policy because none of the NPPF policies include dietary issues.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. PPG simply lists issues that could be taken into account. 04

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

Delete Parts 3 (b) and 4 of the Policy.

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:

Because the Inspector may have to question the plan-making authority or objector on the basis for the commitments and policy or alternatives.

PO3724

Representor Details

Web Reference Number	WF0050
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking Surrey GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

POSITIVELY PREPARED

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JUSTIFIED

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The inclusion of primary schools is particularly problematic, as it is clear that primary pupils are not usually permitted to leave the premises at lunchtime and are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility of parents or guardians. 02

EFFECTIVE

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A further difficulty of using simple distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400-metre walk away.

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CONSISTENT WITH NATIONAL POLICY

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

Delete Parts 3 (b) and 4 of the Policy.

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:

Because the Inspector may have to question the plan-making authority or objector on the basis for the commitments and policy or alternatives.

PO3725

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3726

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

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EFFECTIVE

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CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3727

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3728

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3729

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3730

Representor Details

Web Reference Number	WF0050
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking Surrey GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

POSITIVELY PREPARED

Parts 3 (b) and 4 are negative in their implication that all hot food takeaways have an impact on overweight and obesity beyond that of the variety of other use classes from and at which food and drink of high energy density or poor nutritional value is often sold. Conversely, not all hot food takeaways do sell such food and focussing on them is unfair, contradicts draft Policy LPA11 Part 4, and is unhelpful in removing incentives to reformulate or to offer a wider range of healthier options. Parts 3 (b) and 4 are not based on any objectively assessed development requirement. They effectively assess the requirement for hot food takeaways within 400 metres of the boundary of a school as zero, but do so without evidence of either a link between childhood obesity incidence and the proximity of hot food takeaways to schools or of a distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

Parts 3 (b) and 4 set a distance that could have the effect of banning hot food takeaways from large areas of the Borough. Because no assessment has been made of the number that might be refused as a result or what the social, economic or environmental impacts (e.g. reduced access to local facilities, investment, jobs and journey lengths) of that might be, it is not possible to balance these impacts. 01

JUSTIFIED

There is no strong or consistent evidence either for hot food takeaways having an impact on overweight and obesity beyond that of other use classes from and at which food and drink is sold or for a link between the incidence of overweight and obesity and proximity to schools.

The inclusion of primary schools is particularly problematic, as it is clear that primary pupils are not usually permitted to leave the premises at lunchtime and are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility of parents or guardians. 02

EFFECTIVE

Not all hot food takeaways sell food and drink of high energy density or poor nutritional value, which is available from a variety of uses within other Classes, so that focussing on hot food takeaways is not only unfair, but will actively remove incentives to offer a wider range of healthier options and to reformulate existing offers.

A further difficulty of using simple distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400-metre walk away.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 03

The lack even of any potential mechanism for, let alone strong or consistent evidence of, a link between proximity to primary schools and incidence of overweight and obesity amongst pupils at those schools, means that refusing permission within 400 metres of a primary school could never be effective.

It is unclear how the effectiveness of these parts of the policy would be monitored: Would negative outcomes result in changing the thresholds or distances?

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been had to national policy and advice in preparing Parts 3 (b) and 4 of the Policy because none of the NPPF policies include dietary issues.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. PPG simply lists issues that could be taken into account. 04

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

Delete Parts 3 (b) and 4 of the Policy.

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:

Because the Inspector may have to question the plan-making authority or objector on the basis for the commitments and policy or alternatives.

PO3731

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3732

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3733

Representor Details

Web Reference Number	WF0010
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10 (3-4)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
POSITIVELY PREPARED
The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school or college as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.
In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.
The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle,

and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. 01

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair. 02

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools or further education establishments and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. 03

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. 04

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. 05

As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. 06

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. 07

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. 08

The area that would be affected by the policy covers a large part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? 09

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 10

CONSISTENT WITH NATIONAL POLICY
We consider that no regard has been had to national policy and advice in preparing Policy LPD10 because none of the NPPF policies include dietary issues.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 11
The NPPG simply refers to a briefing paper containing studies on the issue.

7. Please set out modification(s) you consider are necessary
Delete parts 3 and 4 of draft Policy LPD10.

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:
Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 6:55:18 PM

PO3734

Representor Details

Web Reference Number	WF0050
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking Surrey GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

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	LPD10
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

POSITIVELY PREPARED

Parts 3 (b) and 4 are negative in their implication that all hot food takeaways have an impact on overweight and obesity beyond that of the variety of other use classes from and at which food and drink of high energy density or poor nutritional value is often sold. Conversely, not all hot food takeaways do sell such food and focussing on them is unfair, contradicts draft Policy LPA11 Part 4, and is unhelpful in removing incentives to reformulate or to offer a wider range of healthier options. Parts 3 (b) and 4 are not based on any objectively assessed development requirement. They effectively assess the requirement for hot food takeaways within 400 metres of the boundary of a school as zero, but do so without evidence of either a link between childhood obesity incidence and the proximity of hot food takeaways to schools or of a distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

Parts 3 (b) and 4 set a distance that could have the effect of banning hot food takeaways from large areas of the Borough. Because no assessment has been made of the number that might be refused as a result or what the social, economic or environmental impacts (e.g. reduced access to local facilities, investment, jobs and journey lengths) of that might be, it is not possible to balance these impacts. 01

JUSTIFIED

There is no strong or consistent evidence either for hot food takeaways having an impact on overweight and obesity beyond that of other use classes from and at which food and drink is sold or for a link between the incidence of overweight and obesity and proximity to schools.

The inclusion of primary schools is particularly problematic, as it is clear that primary pupils are not usually permitted to leave the premises at lunchtime and are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility of parents or guardians. 02

EFFECTIVE

Not all hot food takeaways sell food and drink of high energy density or poor nutritional value, which is available from a variety of uses within other Classes, so that focussing on hot food takeaways is not only unfair, but will actively remove incentives to offer a wider range of healthier options and to reformulate existing offers.

A further difficulty of using simple distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400-metre walk away.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. 03

The lack even of any potential mechanism for, let alone strong or consistent evidence of, a link between proximity to primary schools and incidence of overweight and obesity amongst pupils at those schools, means that refusing permission within 400 metres of a primary school could never be effective.

It is unclear how the effectiveness of these parts of the policy would be monitored: Would negative outcomes result in changing the thresholds or distances?

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been had to national policy and advice in preparing Parts 3 (b) and 4 of the Policy because none of the NPPF policies include dietary issues.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. PPG simply lists issues that could be taken into account. 04

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

Delete Parts 3 (b) and 4 of the Policy.

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:

Because the Inspector may have to question the plan-making authority or objector on the basis for the commitments and policy or alternatives.

PO3735

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]

EL0192A.2.pdf

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:	[redacted]	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.

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.

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 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 REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

B within the New Local Plan. This will be discussed further within the forthcoming Sections of this representation.

Land Assembly of Garden Suburb

6.13 Bold Forest Garden Suburb is the largest single residential allocation within the New Local Plan, with an indicative capacity of 2,988 dwellings, some 2,100 dwellings larger than the next largest allocation. It is a Key Strategic Site, the delivery of which is seen as essential by the Council in both meeting the needs of the Borough as well as securing the soundness of the New Local Plan.

6.14 The Site extends to approximately 133 hectares and is made up of numerous land parcels in which are in multiple ownerships. This in itself has the potential to add another layer of complexity, particularly if different land owners have conflicting interests. This could potentially place additional costs on bringing the whole site forward and has the potential to cause delays to its delivery.

6.15 Our Client considers that the delivery of this site is a key factor in the successful delivery of the Council's spatial strategy. As such, the Council needs to be certain that this site will deliver as projected (given the need for upfront infrastructure works), and be able to clearly demonstrate that landowners will be willing to work collaboratively to bring it to fruition. We would suggest the need for a memorandum of understanding to be signed by the landowners to provide certainty over its deliverability.

Infrastructure Requirements

6.16 Policy LPA08 of the New Local Plan outlines why and how developer contributions will be sought, the hierarchy of developer contributions, as well making provision for economic viability within development proposals and the impact that developer contributions may have upon this.

6.17 Our Client considers that the Policy generally accords with the thrust of national policy. However, concerns have been raised around Appendix 2 referred to within the supporting text of this policy. Appendix 2 represents a non-exhaustive list of what the Council considers infrastructure to constitute. The Policy states that the Council will seek satisfactory provision of *all* forms of infrastructure that are required to serve the needs of the local community. There is no evidence supporting the contents of Appendix 2, nor is there any formula provided as to how the contribution for each will be calculated. Appendix 2 would appear to represent a wish-list for the Council rather than a factual

list of what is actually required. Our Client considers there to be a need for greater clarity and evidence on what is actually required and the contributions that this is likely to entail (i.e. quantified in monetary terms). Our Client recognises that the Policy makes reference to a Developer Contributions Supplementary Planning Document; whilst this may serve to alleviate some of these concerns, it does not provide any timescales for the production of this SPD; this is important given the need for developers and the Council to have regard to S106 requirements as part of their viability appraisals at the plan-making stage. 13

6.18 The Policy also makes reference to the latest version of the St Helens Borough Infrastructure Delivery Plan (IDP), dated December 2018. The IDP intends to set out what level of new or improved infrastructure will be required to facilitate the levels of growth provided for by the New Local Plan.

6.19 The IDP outlines the projects that will be required within the Borough throughout the Plan period, including outlining estimated costs of these projects. However, the IDP does not provide clarity on the likely costs to developers resulting from these projects. Our Client is concerned that whilst the IDP contains a comprehensive list of projects required to deliver the growth of the Borough, it does not contain details of site-specific requirements. In the case of the sites allocated for development, one would expect specific requirements to be outlined within the Site Profiles. The IDP fails to do this. Whilst the Site Profiles in Appendix 5 provides some information about what may be required for the key allocated sites, it is vague and does not provide any clarity or certainty going forward. Our Client considers that greater, site-specific detail around developer contributions is required in order to understand the viability and deliverability implications at the plan-making stage. 14

PO3736

4HS

EL0216

Representations on behalf of Jones Homes (North West) Limited - Submission Draft
Lorraine Robertson
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:49

[redacted]

1 Attachment

27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

1 - LPA02
2 - LPA05
3 - LPA05 - TABLE 4.6
4 - GBR
5 - HERITAGE IMPACT ASS
6 - LPA06
7 - APPENDIX 4 MONITORING FRAMEWORK
8 - SHLAA
9 - LPA04

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson
Senior Planner
[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.

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Vincent
Last Name:	Last Name: Ryan
Organisation/company: **Jones Homes (North West) Ltd**	Organisation/company: Barton Willmore
Address: **c/o Agent**	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester
Postcode:	Postcode: M3 3BZ [redacted]

Signature: [redacted] **Date:** 13 March 2019

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

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

Yes ☒ (Via Email) No ☐

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

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	**Appendix 4 – Monitoring Framework**	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

7

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

See separate document.

Please continue on a separate sheet if necessary

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

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

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

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

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

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bartonwillmore.co.uk
18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ
[redacted]

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

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR
13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 – SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange – 153 units
- Eccleston Grange – 283 units
- Former Caremlite Monastery – 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.

Registered in England
Number: OC342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
T/ +44 (0)118 943 0001

aspirations is likely to necessitate the allocation for further land for housing and our Client's sustainable Site is ideally placed to meet those housing needs.

The relationship between Policy LPA06 and the SDLP's Monitoring Framework is confusing. If the granting of planning permissions on Safeguarded Land within the Plan period will trigger the requirement to consider a Local Plan review, then policy LPA06 needs to make clear under what circumstances Policy LPA06 will permit the development of Safeguarded Land within the Plan period. 7

On the basis of our comments within these representations, and as confirmed on the enclosed Representations Form, our Client wishes to participate at the oral part of the Local Plan Examination, in order to explore these issues further with the Council and Examination Inspector.

We trust that our Client's representations are of assistance to the Council in advancing its Local Plan, and we would welcome the opportunity to discuss the matters set out above in more detail with officers in order to help address our Client's concerns with respect to the soundness of the Plan.

Yours sincerely,

[redacted]

VINCENT RYAN
Director

Enclosures

Representations Form
Representations of Jones Homes to the Preferred Options Local Plan
Land East of Newlands Grange Development Framework
Land East Newlands Grange updated Concept Masterplan (BW01 Rev V3)
Transport Representations Appraisal by Focus Transport Planning
Historic England representations to the Preferred Options Local Plan

PO3737

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.0.4.1
6 S.0.5.1
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 3, 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

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
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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,

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Thanks and kind regards,

Graham Lamb
Associate Planner

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

[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

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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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Pegasus Group

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

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

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

Part 1 - Housing Requirement

5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.

5.3 This 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). This is a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence).

5.4 So, this is an economic led figure, however it represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and represents the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019).

5.5 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.

5.6 At the outset, we must stress we are surprised and disappointed by this reduction in the requirement figure and are unsure how this represents a positively prepared plan, or how this will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.

5.7 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7.**

5.8 It had been our intention to provide a detailed Housing Needs Assessment using the Chelmer model to put forward our own housing requirement figure; however, we have held off from doing this at the current time for the following reasons:

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

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

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

National Guidance on Housing Need

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

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

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

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

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

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

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

> *"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*
>
> *This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, <u>but are not limited to</u> situations where increases in housing need are likely to exceed past trends because of:*
>
> - *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
> - *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
> - *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*
>
> *There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."*

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

> *"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, <u>and that it adequately reflects current and future demographic trends and market signals</u>, the approach can be considered sound as it will have exceeded the minimum starting point.*
>
> *Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and*

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

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

Conclusions from Pegasus Housing Need Assessment

5.17 Our contextual analysis drew the following conclusions:

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

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

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

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

Part 2 - Housing Supply

5.20 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.

5.21 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

5.22 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area.

5.23 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. 11

Part 4 - Monitoring and Supply

5.24 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.

5.25 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level).

5.26 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement. 12

5.27 In respect of housing an AMR, or equivalent document, should include the following as a minimum:

- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
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- Details of affordable completions – to monitor effectiveness of Policy LPC02.
- Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.

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

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

PO3738

SITE : FORMER LPPO 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

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(1) - LPA05
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(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

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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.

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Principal Planner

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

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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

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

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

Part 1 - Housing Requirement

5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.

5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.

5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.

5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).

5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.

5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

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

5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence). It is one that is directly pinned to the Council's expectations on how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.

5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7.** Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from a Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative) with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. Therefore, we believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.

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

National Guidance on Housing Need

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

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

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

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

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

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

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

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

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

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

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

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

> *"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*
>
> *Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."*

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

Conclusions from Pegasus Housing Need Assessment

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

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

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

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

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

5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.

5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 7,** utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).

5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure or 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it corollate with recent jobs growth in St Helens.

5.22 In light of the above and analysis provided at **Appendix 7**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

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

Part 2 - Housing Supply

5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.

5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within Section 5 and the overall supply position in Section 6.

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5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. 11

Part 4 - Monitoring and Supply

5.28 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.

5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level). 12

5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.

5.31 In respect of housing an AMR, or equivalent document, should include the following as a minimum:

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

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

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

13

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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

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1 LPA05
2 LPA02
3 GBR
4 SA
5 S.0.4.1
6 S.0.5.1
7 LPA02 - PARA 3
8 LPA02 - PARA 4
9 LPA03
10 LPA04
11 LPA05 - PARA 3
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13 APPENDIX 4
14 LPA05 - TABLE 4.6
15 LPA05.1
16 LPA06
17 LPC01
18 LPC02
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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:
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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.

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8
Rebecca Dennis
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1 Attachment

Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

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2 Attachments

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

Email 4 of 8 of Wallace representations.

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

Email 6 of 8 of Wallace representations.

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7 Attachments

Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-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.

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1 Attachment

Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

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ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

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

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

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

Part 1 - Housing Requirement

5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.

5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.

5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.

5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).

5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.

5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

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

5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence). It is directly pinned to the Council's expectations as to how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.

5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 6.** Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative), with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. We believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.

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

National Guidance on Housing Need

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

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

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

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

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

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

> *"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*
>
> *This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, <u>but are not limited to</u> situations where increases in housing need are likely to exceed past trends because of:*
>
> - *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
> - *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
> - *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*
>
> *There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."*

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

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

> *"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*
>
> *Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."*

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

1

Conclusions from Pegasus Housing Need Assessment

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

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

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

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

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

5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.

5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 6,** utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).

5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure or 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it corollate with recent jobs growth in St Helens.

5.22 In light of the above and analysis provided at **Appendix 6**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

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

Part 2 - Housing Supply

5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.

5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

5.26 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area.

5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account of local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. 11

Part 4 - Monitoring and Supply

5.28 Wallace fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.

5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level). 12

5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is made a policy requirement.

5.31 In respect of housing, an AMR, or equivalent document, should include the following as a minimum:

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

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

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

6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period, taking into account the five-year housing land supply position and the Housing Delivery Test.

6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base.

6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites.

6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated

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Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission Draft
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1 Attachment

St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

(1) - PARA 4.27.8
(2) - LPA04.1
(3) - LPA05
(4) - LPA03
(5) - LPA07 - Criteria
(6) - TIA
(7) - IDP
(8) - APPENDIX 5
(9) - LPA07 - Criteria (6)
(10) - Gateway

Good morning

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

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)
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13 March 2019

Dear Sir / Madam

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

Thank you for consulting Highways England regarding the submission draft of your Local Plan. We very much welcome the opportunity to review you plans and provide advice that I trust will be helpful to you as the plans proceed.

Highways England is responsible for the Strategic Road Network (SRN) in England. Within St Helens this includes parts of the M62 and M6 motorways and, to the north and west, the M58 and M57 motorways. The comments I make here relate to the potential impacts of your plans on that network.

On the whole, we are supportive of the methodology used and the outcomes shown within the Plan. Significant work has clearly been undertaken regarding both the Local Plan itself and the supporting transport evidence base. That notwithstanding, there are gaps in the information that has been published as part of the consultation process, and as such there are a number of points and recommendations we wish to make resulting from our review. These areas are listed below.

Major Road Network

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region. 1

Strategic Employment Sites

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan 2

Sustainability

Policies that promote sustainable methods of transport are welcomed by Highways England in that they offer both environmental benefits and help in the reduction of congestion on the SRN. We would therefore recommend that the Local Plan sets out specific detail in Policy LPA03 regarding how the local authority will guide development to be focussed in sustainable and accessible locations. The following observations have also been made regarding sustainability:

- A number of sites within the Plan have limited sustainable access to St Helens railway stations, being further than the recommended walking distance. Accessibility increases significantly if cycling is included, however significant infrastructure improvements and behaviour changes will be required to make this viable.

- Three-quarters of employment allocations, and just under a third of housing allocations, were identified as having Average or worse accessibility by bus.

- Whilst it is noted that a number of sites are rated as being within a Good or Excellent distance from cycle routes, the rating does not take into account the ease of the access to the route, or quality of the route and its connectivity to key origins and destinations.

- With regards to the Core Accessibility Indicators, it was found that the housing allocations were, in the main, well located in terms of major food stores, healthcare facilities, local centres and primary schools, while secondary schools are more dispersed which decreases accessibility by foot. The assessment recommends potential improvements to pedestrian facilities to encourage more travel by foot to local facilities.

The assessment of the issues in terms of current sustainable transport accessibility to the proposed Local Plan site allocations is comprehensive. However, overall it is considered that the measures proposed are light-touch, placing a strong emphasis on future documents such as the LCR LCWIP, Transport Assessments / Statements and Travel Plans to establish appropriate measures on a more localised site-by-site basis rather than offering more strategic measures that impact across the Borough. With this in mind, it is difficult to assess to what extent the investment into non-car modes throughout the Borough in the Local Plan period will impact the SRN. That notwithstanding, we support the implementation of the LCR LCWIP as a means of providing a policy framework which encourages walking and cycling.

Transport and Travel Plans

To assist in the promotion of sustainable methods of transport, it is usually recommended that development sites adopt a Travel Plan in order to limit the number of car journeys in favour of public transport or non-motorised forms of travel. Policy LPA07 states that developments which generates significant amounts of traffic should be supported by a Transport Assessment or Transport Statement, however the implementation of Travel

PO3741

Fw: Warrington Response to St Helens Local Plan NTLS

[redacted] 20/01/2020 10:55

[redacted]
Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

A: Town Hall Annexe, Victoria Square, St. Helens, WA10 1HP
T: [redacted]
E: [redacted]
W: www.sthelens.gov.uk/localplan

----- Forwarded by [redacted] on 20/01/2020 10:54 -----

From: [redacted]
To: [redacted]
Cc: [redacted]
Date: 16/04/2019 11:41
Subject: Fw: Warrington Response to St Helens Local Plan NTLS

[redacted]

I attach Warrington's comments.

They had sent them previously but only to [redacted] and my in box and it was not clear at that stage if they were the final comments.

I have confirmed to them that we will log their letter as a formal response.

Best Regards,

[redacted]
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

[redacted]
----- Forwarded by [redacted] on 16/04/2019 11:38 -----

From: "Bell, Michael" [redacted]
To: [redacted]
Date: 16/04/2019 11:25
Subject: FW: Warrington Response to St Helens Local Plan NTLS

[redacted]

I understand you wanted me to send our comments again.

Michael

From: Bell, Michael
Sent: 13 March 2019 11:37
To: [redacted]
Subject: Warrington Response to St Helens Local Plan NTLS

[redacted]

I have attached our response in the form of a letter. It identifies the site allocations we are providing comments on and includes some suggested wording to ensure the plan is sound.

In order to get lead Member sign off I have had to prepare a letter rather than use your on-line form.

Can you confirm this is an acceptable format for our response.

regards

Michael Bell

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH

[redacted]

****
*****

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- Warrington Response to St Helens Local Plan Draft Submission Version.pdf

EL0298

① - LPA04 ④ - LPA06
② - LPA05 ⑤ - APPENDIX 5
③ - DEC ⑥ - APPENDIX 7
⑦ - LPA10
⑧ - LPA04 - 8EA

[redacted]
St Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

WARRINGTON
Borough Council
Andy Farrall
Executive Director
Economic Regeneration, Growth and Environment

Town Hall
Sankey Street
Warrington
WA1 1UH

13 March 2019

Dear [redacted]

RE: St. Helens Local Plan 2020-2035 Submission Draft

Scale of housing and employment growth

Warrington is supportive of St. Helens' overall growth ambitions and its commitment to meet its own housing and employment needs. ① & ②

Warrington and St Helens, together with Halton, form the mid-Mersey Housing Market Area. All three Councils have worked closely around housing need and supply issues as part of our respective 'duty to cooperate' obligations. ③

Site 1EA - Omega South Western Extension

Warrington agrees that the site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington, although it will continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does. ①

As stated in Warrington Borough Council's response to the Preferred Development Option consultation, Warrington does therefore agree to Site 1EA1: Omega South Western Extension forming part of Warrington Borough Council's employment land supply. This will be confirmed in the forthcoming Proposed Submission Version of the Warrington Local Plan.

It is noted that the intention is for the extension to use the existing access arrangements for the wider Omega site. It should also be noted that working closely with Omega Warrington Limited, the Council has developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega as a strategic employment and housing location. This work has highlighted that both the local and strategic road ①

network will be placed under considerable pressure when the current extent of the Omega site is fully developed.

Therefore it would be for any future planning application for this extension to Omega to demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8. Any highway mitigation measures shown necessary would require appropriate contributions payable towards either the Council's programme of transport improvements and / or to Highways England.

If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.

1

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- *a future planning application for this extension to Omega must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.*
- *If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads*

1 & 5

SUGGESTED MODS

<u>Site 1ES - Omega North Western Extension</u>

Warrington does not believe that this scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62 will be required.

The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington and the Council therefore does not consider that this future extension could contribute to Warrington's future employment land supply.

4

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

7

- *Any development of this site will require major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England.*

SUGGESTED MOD

& 6

Site 8EA - Parkside West

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requests the following addition to the site requirements in Appendix 5 to ensure that the Local Plan is sound:

- *the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England.*

Site EA9 - Parkside East EA9 (7EA)

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requested the following additions to Policy LPA10 to ensure that the Local Plan is sound:

- *the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England*

and the following addition to paragraph 4.36.8 of the Reasoned Justification:

- *Part of the proposed link-road runs through the administrative area of Warrington Borough Council.*

Site – LHA4 Bold Forest Garden Suburb (4HA)

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from the proposed Garden Suburb uses Warrington's local road network through the village of Burtonwood to access

the motorway network at M62 Junction 8. There will also be the need to identify measures for sustainable access to connect the potential Garden Suburb by public transport, walking and cycling to the employment opportunities at Omega

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Bold Forest Garden Suburb are worked up in detail. The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- *The Area Action Plan for Bold Forest Garden Suburb must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8 and additional traffic through Burtonwood.*

- *It is likely that required transport improvements will include major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England*

- *Measures to enhance accessibility between the Garden Suburb and Omega by walking, cycling and public transport should form part of any overall transport plan for the development.*

I trust the above confirms Warrington's position at this stage of the Local Plan process, but if you require any further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Michael Bell
Planning Policy & Programmes Manager

[redacted]

PO3742

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.

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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.

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RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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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.

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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)									

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

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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 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.

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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, Aldermary House, 10 - 15 Queen Street, London, EC4N 1TX
Registered number: 2078863 VAT number: 449246134

RTPI AWARDS FOR PLANNING EXCELLENCE WINNER 2017

indigo.

expanded and / or enhanced infrastructure that is required to serve the development of the whole site". This requirement is vague and it is unclear what is meant by "*expanded or enhanced infrastructure*". It should therefore me removed given the policy and plan as whole addresses infrastructure requirements adequately. 18

LPA05.1(3) requires development proposals which only cover part of a Strategic Housing Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site. 19

Appendix 5

We support the identification of site access via Vicarage Road and the A580 and have undertaken extensive discussions with Officers at St Helens Council to agree access for the site. 20

It is proposed that the primary access to the site will be taken from Vicarage Road via a new priority controlled junction along with a right turning ghost island provided. A secondary access is proposed from the A580 East Lancashire Road, this access will only cater for left in and left out movements.

Barratt are aware that the site will require a pedestrian and cycleway connection from the sites eastern boundary to the site entrance to the north on the A580. However, the specifics of this access point should be addressed during the planning application process and not included within planning policy.
We support the amendment to the site requirements relating to Clipsley Brook. An FRA will be submitted with the planning application and flooding matters will be dealt with at planning application stage.

Financial contributions will be assessed during the planning application process and will be subject to the relevant S106 policies and will be reasonable and justified. It is therefore not necessary to identify within policy contributions which are 'likely' to be required. Reference to highways and educations contributions should therefore be removed. 21

Policy LPA07: Transport and Travel

Policy LPA07(9) states that further details of the policy will be set out in a future review of the Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim. 22

The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period. This is to ensure that the most relevant and up to date information is used.

PO3743

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]

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RTPI Planning Consultancy of the Year 2017

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[redacted]

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St.Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
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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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Yes ☐ (Via Email) No ☐

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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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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, Aldermary House, 10 - 15 Queen Street, London, EC4N 1TX
Registered number: 2078863 VAT number: 449246134

RTPI AWARDS FOR PLANNING EXCELLENCE WINNER 2017

indigo.

expanded and / or enhanced infrastructure that is required to serve the development of the whole site". This requirement is vague and it is unclear what is meant by "*expanded or enhanced infrastructure*". It should therefore me removed given the policy and plan as whole addresses infrastructure requirements adequately. 18

LPA05.1(3) requires development proposals which only cover part of a Strategic Housing Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site. 19

Appendix 5

We support the identification of site access via Vicarage Road and the A580 and have undertaken extensive discussions with Officers at St Helens Council to agree access for the site. 20

It is proposed that the primary access to the site will be taken from Vicarage Road via a new priority controlled junction along with a right turning ghost island provided. A secondary access is proposed from the A580 East Lancashire Road, this access will only cater for left in and left out movements.

Barratt are aware that the site will require a pedestrian and cycleway connection from the sites eastern boundary to the site entrance to the north on the A580. However, the specifics of this access point should be addressed during the planning application process and not included within planning policy.
We support the amendment to the site requirements relating to Clipsley Brook. An FRA will be submitted with the planning application and flooding matters will be dealt with at planning application stage.

Financial contributions will be assessed during the planning application process and will be subject to the relevant S106 policies and will be reasonable and justified. It is therefore not necessary to identify within policy contributions which are 'likely' to be required. Reference to highways and educations contributions should therefore be removed. 21

Policy LPA07: Transport and Travel

Policy LPA07(9) states that further details of the policy will be set out in a future review of the Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim. 22

The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period. This is to ensure that the most relevant and up to date information is used.

PO3744

St Helens Local Plan - Site 4HA Bold Forest Garden Suburb
John Grace
to:
[redacted] planningpolicy@sthelens.gov.uk
08/05/2019 14:23

[redacted]

3 Attachments

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

Call for Sites Form Abbotsfield Farm.pdf

Dear [redacted]

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

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

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

Kind regards

John Grace

EF00838_1.pdf

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [redacted] **Date:** 7/5/19

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

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

EF0083A 1.pdf

Yes ✓☐ (Via Email) No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	**LPA05.1**	Paragraph / diagram / table	**Table 4.5**	Policies Map	**Site 4HA**	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				**Requirements for site 4HA in Appendix 5 (pages 233-234 of the Submission Local Plan)**					

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

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

- It provides a positively prepared plan that meets the area's housing needs; 01
- It is justified as a highly appropriate Garden Suburb in this location;
- It is consistent with National Policy in delivering sustainable development.

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

02

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

There is no reason why all of site 4HA Bold Forest Garden Suburb cannot come forward in the Plan period. Certainly our land at Abbotsfield Farm is available, suitable and immediately deliverable. All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity. 02

To make the Plan effective, it is necessary for the Development Requirements in Local Plan Appendix 5 to be modified regarding the equalization of timing, housing density, type of housing and developer contributions on the site. 03

Please continue on a separate sheet if necessary

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

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

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

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

Please continue on a separate sheet if necessary

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

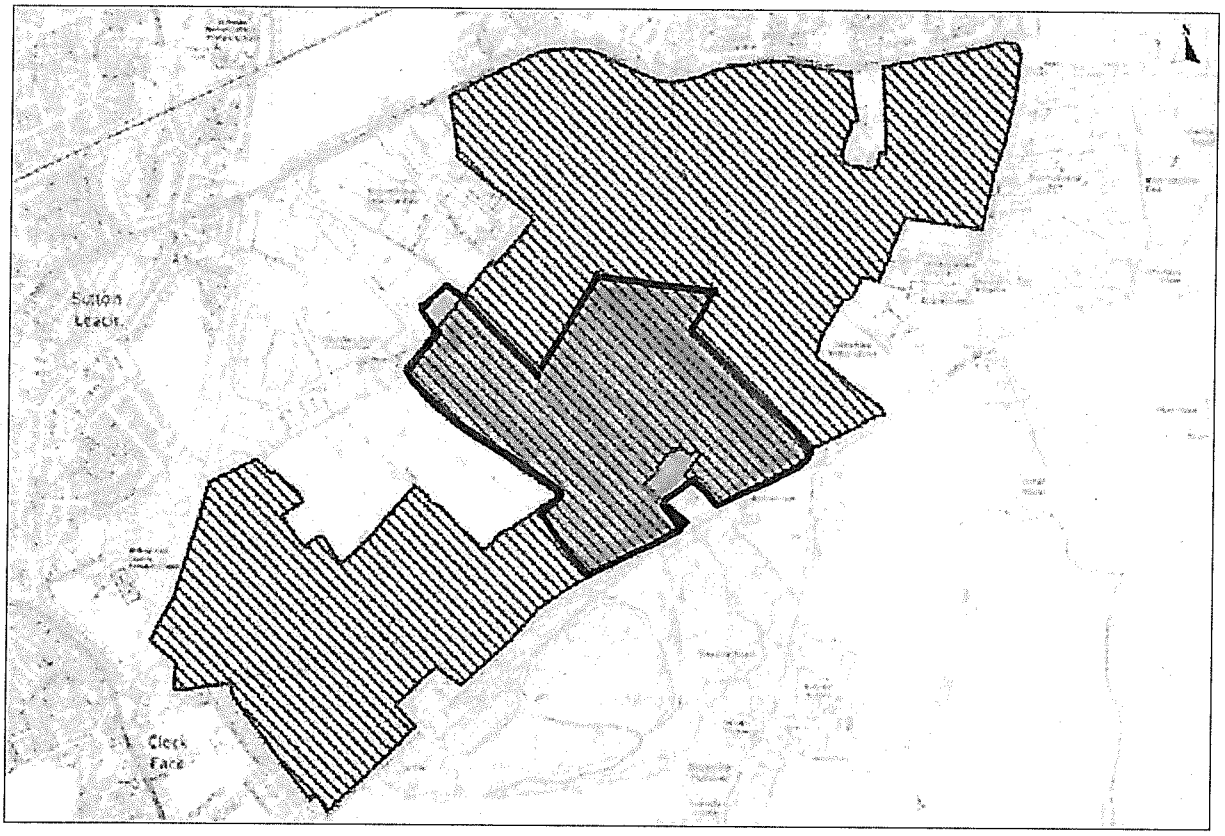
8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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

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

We [redacted] at Abbotsfield Farm in the centre of the proposed Bold Forest Garden Suburb (site 4HA) therefore all plans will have a direct impact on [redacted] For these reasons we wish to be involved in all discussions regarding the future of this site.

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



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

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

Please keep a copy for future reference.

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

[redacted]

[redacted]

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

By post and email to:
[redacted]

Date: 8th May 2019

Dear [redacted],

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

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

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

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

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

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

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

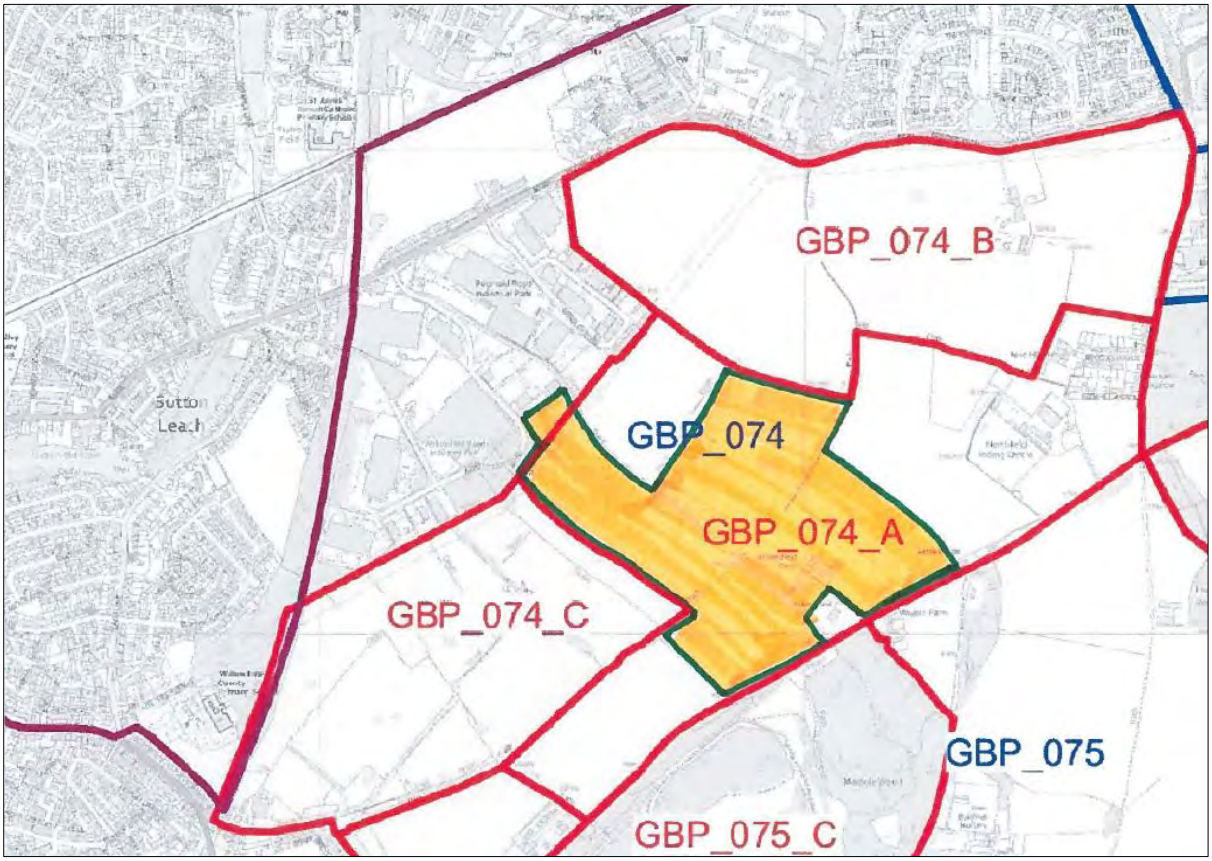
Yours sincerely,

[redacted]

Bernard and Margaret Grace

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

Extent of our landownership outlined in green, overlain on the Green Belt Parcels South Map



PO3745

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

4.0 BOLD FOREST GARDEN SUBURB – CONCEPT MASTERPLAN

4.1 Our Client welcomes that their land interest forms part of the key, strategic site allocation with the New Local Plan, recognising it as a suitable location for a new garden suburb and the most exciting development opportunity in the Borough for a generation.

4.2 In support of this Representation, Barton Willmore has, on behalf of our Client, prepared a Concept Masterplan for our Client's land interest providing one example of how the site could be developed in the future. Compliant with the aims, objectives and principles of both the New Local Plan and the previously adopted Bold Forest Area Action Plan.

4.3 A copy of the aforementioned Concept Masterplan is available at **Appendix 2** of this Representation.

4.4 Our Client's vision for the Site it to create a sustainable urban extension to the existing built up area providing new, high quality homes alongside accessible public open space and new community infrastructure. The Site will provide a rich landscape framework accommodating greenways, footpath and bridleway enhancements and include the potential for community facilities and public open space. The proposed development would build upon the principles of a modern garden village, with new homes designed in a layout that maximises opportunities to integrate with the wider area.

4.5 The masterplan highlights the Site's excellent location and sustainability credentials with access to a number of sustainable transport options including bus services and the rail network. The Site also has access to a number of local amenities and employment opportunities.

4.6 The Site extends to approximately 135 hectares, with an indicative capacity of circa 2,900 dwellings, of which approximately 1,000 dwellings could be accommodated within our Client's land interest. The Masterplan demonstrates that the Site is capable of accommodating a mix of dwelling types and tenures in line with the Council's requirements.

4.7 The Masterplan demonstrates how exiting landscape features will be retained and incorporated into a green infrastructure network. Creating a setting and identity for the new development, whilst also providing increased biodiversity, recreation opportunities and landscape visual mitigation. Green spaces and new planting throughout the proposed development will provide attractive, functional and accessible places for leisure and

recreation. These spaces will vary in appearance, scale and use, from incidental green spaces containing existing landscape features to a more sizable areas of open space adjacent to and integrating with the existing woodland, emphasising the garden suburb nature of the development.

4.8 Vehicle access to the Site will be delivered from Neills Road, Travers' Entry, and Reginald Road. Internally, a simple Estate Road will provide vehicle connectivity across the Site and a sequence of public spaces will be connected by the Estate Road. These spaces will range in form and function with a mix of hard surface materials and planted landscape features.

4.9 The proposed development will also provide effective pedestrian and cycle connectivity across the Site and to the surrounding residential area. This will include connections to the existing residential neighbourhood to the north. New paths, capable of accommodating pedestrians and cyclists, will be provided through a network of open space and the proposed residential streets. Shared surfaces, changes in horizontal alignment, construction and materials will all help to encourage walking and cycling rather than car use for local travel.

4.10 The proposed development will reflect the character, scale and density of properties within the local townscape. Moreover, perimeter blocks and a legible network of streets will provide an attractive environment connecting the site with the surrounding environment.

4.11 The Concept Masterplan for our Client's land interest demonstrates the high-quality development that is intended for the Site. It successfully demonstrates that the Site could be integrated into the environment providing an attractive and aspirational place to live. It also highlights how our Client's land interest could be delivered in isolation or as part of the wider Bold Forest Garden Suburb allocation and that realistically, it would be logical for the northern parcels of the allocation to be delivered first, earlier within the Plan period.

4.12 Overall our Client considers that the Concept Masterplan prepared for their land interest represents a high-quality proposal which fully accords with the Vision, Strategic Aims and Objectives of the New Local Plan and again, wholeheartedly supports the inclusion of the Site within the New Local Plan.

PO3746

EL0246

Sites 5EA & 6EA

① - LPA02

② - LPA03

③ - LPA04

Representation to the Local Plan Consultation - Sites 5EA and 6EA
Matthew Thomas
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:41

[redacted]

2 Attachments

④ - LPA04-1

⑤ - Appendix 5 Site profiles

31020 - Local Plan Letter to St Helens - 13.03.19.pdf

WIE15628-100-R-1-2-2 Supplementary Transport and Access Review.pdf

Hi,

Please find attached a letter of representation to the St Helens Borough Local Plan 2020-2035 that has been made on behalf of Canmoor Developments Ltd.

The representations specifically support the proposed allocation of sites 5EA and 6EA.

I trust that this will be taken into account in the preparation of the plan.

Regards,

Matthew

Matthew Thomas
MPlan MRTPI
Principal Planner

Michael Sparks Associates
Chartered Architects
11 Plato Place, St. Dionis Road, London SW6 4TU

[redacted]

30 YEARS MICHAEL SPARKS ASSOCIATES

The Planet Mark
eden project

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EL0246

MSA/31020/1/001

13 March 2019

MICHAEL SPARKS ASSOCIATES

CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DIONIS ROAD
LONDON SW6 4TU

[redacted]

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

Dear Sir / Madam,

NEW ST HELENS LOCAL PLAN 2020-2035 SUBMISSION DRAFT CONSULTATION

Further to the Council's publication of the draft new St Helens Local Plan 2020-2035 please find representations made below on behalf of Canmoor Developments Ltd in respect of sites 5EA and 6EA that have draft allocations for employment development within the Draft Local Plan.

Canmoor Developments are a pre-eminent warehouse and industrial developer with offices in London and Manchester, who have developed a significant portfolio of employment floorspace across the UK. They have made considerable investment across the north-west region to provide modern employment units for business that support the creation of jobs and are working with the respective landowners of sites 5EA and 6EA with the intention of developing these sites to add to their pipeline of warehouse and industrial development.

It is the intention that these sites will be developed to provide high quality, modern employment units that meet the high levels of occupational demand in this part of the UK and it is on this basis that these representations are made.

Sites 5EA and 6EA have been promoted for development as they are seen to be ideally placed to meet the demands of the occupational market, due to their location in close proximity to the Haydock Lane Industrial Estate, junctions 23 and 24 of the M6 as well as the East Lancashire Road/A580.

Whilst the sites are labelled as 5EA and 6EA in the emerging Local Plan, they are referred to by Canmoor as Link 23 and Millfield Park respectively.

In considering whether this amount of land should be allocated and removed from the Green Belt, the approach to preparing the Local Plan has been based on a robust methodology that takes account of local and regional economic factors as well as consideration of other alternative development scenarios.

The objectives of this policy are therefore considered to be sound and in accordance with National Policy.

3

Policy LPA04.1 Strategic Employment Sites

This policy provides additional detail to the proposed allocation of the Millfield Park site south of Liverpool Road (6EA) as a Strategic Employment Site. It is noted that any planning application for such a site must be supported by a comprehensive masterplan, which must set out details of the type of development and phasing, indicative layout and design for the whole site to secure an attractive built form and high quality landscaping.

Furthermore, measures to provide good levels of accessibility by sustainable transport methods are also required, as well as a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way. The policy also requires any application to include information in respect of how energy efficiency and the use of renewable or low carbon energy will be promoted and to ensure that sufficient infrastructure is provided to serve the development. These points would generally be considered under any planning application for the site, would be in the interests of good planning and are therefore supported by our client.

4

It is further noted that any masterplan for a Strategic Employment Site should address the site specific requirements as noted in Appendix 5. In respect of the Millfield Park site, these requirements include:

6EA

- appropriate highways access via Millfield Lane and allocated 2EA site,
- the implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network,
- the design and layout of the development must integrate well with that of any existing or approved development within allocated 4EA and 6EA,
- the provision of effective flood management measures for the Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.

Highways Access

It is welcomed that Appendix 5 identifies that access should be taken from Millfield Lane, however the requirement that access should also be provided from Site 2EA is not supported as it is considered that using this alternative access point is unnecessary. The requirement for access from the allocated 2EA site is inappropriate and unnecessary as an appropriate means of access is available from Millfield Lane, using either land that is public highway or within the

5

control of my client. A detailed assessment of the proposed access from Millfield Lane is included in *Appendix A*.

This detailed assessment concludes that access from Millfield Lane will provide the least stress on Junction 23 of the M6 as there are several advantages of utilising Millfield Lane, including an increase on the route choice for development traffic. The access provides a convenient route onto the northbound M6 at junction 24 and towards Wigan via the A58, thereby potentially reducing the impact of the Millfield Park development at the Haydock Island junction. 5

Flood Risk and Drainage Matters

The Millfield Park site is currently in agricultural use and development of this site to provide employment units will increase the impermeable area on the site so an appropriate drainage strategy will be required to ensure that any risk of flooding associated with the development does not increase the risk of flooding elsewhere. Whilst provision can be made to ensure that drainage from the site can be controlled through appropriate storage and control of surface water utilising SUDS methods, the appendix requires measures to be incorporated to the Clipsley Brook to control flooding along this watercourse. Whilst this may not be the intention of the phrasing of this part of the appendix, the wording is not particularly clear. The NPPF is clear in ensuring that any policies are written in a clear fashion, serve a clear purpose and be proportionate (paragraph 16).

It is understood that there are existing flooding issues along certain sections of the Clipsley Brook but requiring the development of the Millfield Park site to resolve any such issues is considered to be disproportionate. Measures can of course be taken to ensure that surface water run off into this watercourse is controlled from the development site, but any wholesale intervention into the watercourse is not appropriate.

An assessment of the characteristics of the Clipsley Brook along the boundary of the Millfield Park and Link 23 sites has been undertaken by Waterco, using their existing knowledge of this watercourse in their assessment. They have identified that there would be no benefit in making any alterations to the watercourse at this location for the following reasons:

> *The catchment area draining past the development site is small in comparison to the wider Clipsley Brook catchment (approximately 9% of the total area to Blackbrook Road), so any increase in flood storage at the upstream end of the catchment has rapidly diminishing benefits with progression downstream. Clipsley Brook has a very steep gradient past the development site, which results in limited opportunities for in-channel or floodplain storage*
>
> *The extensive channel widening of Option DEV1, although realistically achievable, provides negligible reduction in downstream flood risk (less than 1% reduction in downstream peak flows). It would lead to the loss of numerous mature trees and*

vegetation on both banks of the watercourse. This would be detrimental to biodiversity and would also increase the risk of channel erosion, unless significant works were undertaken as part of the widening to reinforce the vulnerable exposed river banks.

Integration of sites

The wording of Appendix 5 relating to the integration of sites is also open to interpretation and does not meet the tests for new policy provisions within the NPPF. It is assumed that this policy requires new development on proposed allocations to be considered together so that they relate well to each other.

We also note that the references to the nearby sites appears to be incorrect and that the adjacent sites should be referred to as 2EA and 5EA.

The current wording implies that they should be connected in some more meaningful way, whereas as they are identified as separate sites and will come forward at different times, on different land ownerships it is considered unreasonable to connect sites in such a manner. To provide greater clarity, it is proposed that the wording of the Appendix is amended to clarify that proposals on this site needs to relate well to existing and new development.

Proposed Changes to requirements of site 6EA

Given the above, it is therefore recommended that the requirements for site allocation 6EA in Appendix 5 are amended to the following wording:

Requirements:

- *Appropriate highway access via Millfield Lane.*
- *Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highways network.*
- *The design and layout of the development must relate well to that of any existing or approved development within allocated sites 2EA and 5EA.*
- *Provision of effective flood management measures to ensure that the development does not increase the risk of flooding downstream of the site and to provide potential enhancements to biodiversity.*

Summary

The provisions of draft policies LPA02, LPA03 and LPA04 are supported as being necessary to provide for the future needs of St Helens in meeting the Borough's economic needs and to allow for a sustainable form of development.

The allocation of the two sites 5EA and 6EA is also supported to meet the objectives of the proposed policy framework. There is a defined need to provide set out within the Council's evidence base for more employment land of sufficient quality to be provided in the right location to meet the current and future needs of St Helens. Given that there are no other viable

Supplementary Transport and Access Review

Potential Warehousing Site, Millfield Lane, Haydock, St. Helens

March 2019

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Client Name: Canmoor Developments Limited
Document Reference: WIE15628-100-R-1-2-2
Project Number: WIE15628

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

Issue	Date	Prepared by	Checked by	Approved by
Final	13.03.19	Becky Hesketh	John Craft	Darren McCrohan
		Principal Transport Planner	Principal Transport Planner	Technical Director

Comments

Comments

Disclaimer

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We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

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A. Indicative Millfield Park Junction Arrangement

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1. Introduction

1.1. Waterman Infrastructure & Environment has been commissioned by Canmoor Developments Ltd to consider the transport and access requirements for a warehouse and distribution facility 'Millfield Park', (incorporating land use classes B1c/B2/B8) located in Haydock, St. Helens. This work is intended to inform the masterplanning process at a high strategic level, in combination with confirming Representation to the land allocation requirements identified within the new St. Helens Borough Local Plan 2020-2035 Submission Draft.

1.2. This supplementary report supports the previous Transport and Access Review (Document Ref. No: WIB14205-103-R-12-2-1) submitted to St. Helens Council in October 2017 which presents an overview of the transportation issues associated with developing the Millfield Park site and in particular, provides commentary and analysis on access by both sustainable and vehicular modes of transport.

1.3. The site is included within the new St. Helens Borough Local Plan 2020-2035 Submission Draft, with potential land allocation identified within the Submission Draft Policies Map. The Draft Policies Map includes Millfield Park under Employment Allocation 6EA '*Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock'*, which is also identified and allocated as a 'Strategic Employment Site' (Policy LPA04.1). In terms of transportation requirements, the following high-level site-specific requirements for 6EA are contained within Appendix 5 of the submission draft document, which are considered herein:

- Appropriate highway access via Millfield Lane and allocated 2EA site (Florida Farm); and
- Implementation of any measures required to mitigate impacts on the M6 Junction 23 or other parts of the highway network.

1.4. The preliminary masterplan shows a total of nine units constructed at the Millfield Park site. It is proposed the development would be accessed from a priority-controlled access junction on the Millfield Lane frontage. At this time, it is anticipated that Millfield Park would become operational in 2021.

1.5. For the purpose of this report, a total floorspace provision of circa 95,000sqm has been assumed to provide a robust assessment.

1.6. Consideration of the Millfield Park proposals includes information from the adjacent 26,975sqm 'Link 23' warehousing / distribution proposals, for which the associated Transport Assessment (Document Ref. No: WIB14205-103-R-3-2-1) scoped and submitted previously in discussion with St. Helens Council, Highways England and Wigan Council. The Link 23 site also benefits from being included within the new St. Helens Borough Local Plan Submission Draft as potential land allocation site 5EA. A full planning application for the Link 23 proposals was submitted October 2017 (Ref. No: P/2017/0920/FUL) and is currently awaiting decision.

1.7. Further detailed work would be required to support any future planning application for the Millfield Park site, to be undertaken in the form of a Transport Assessment (TA).

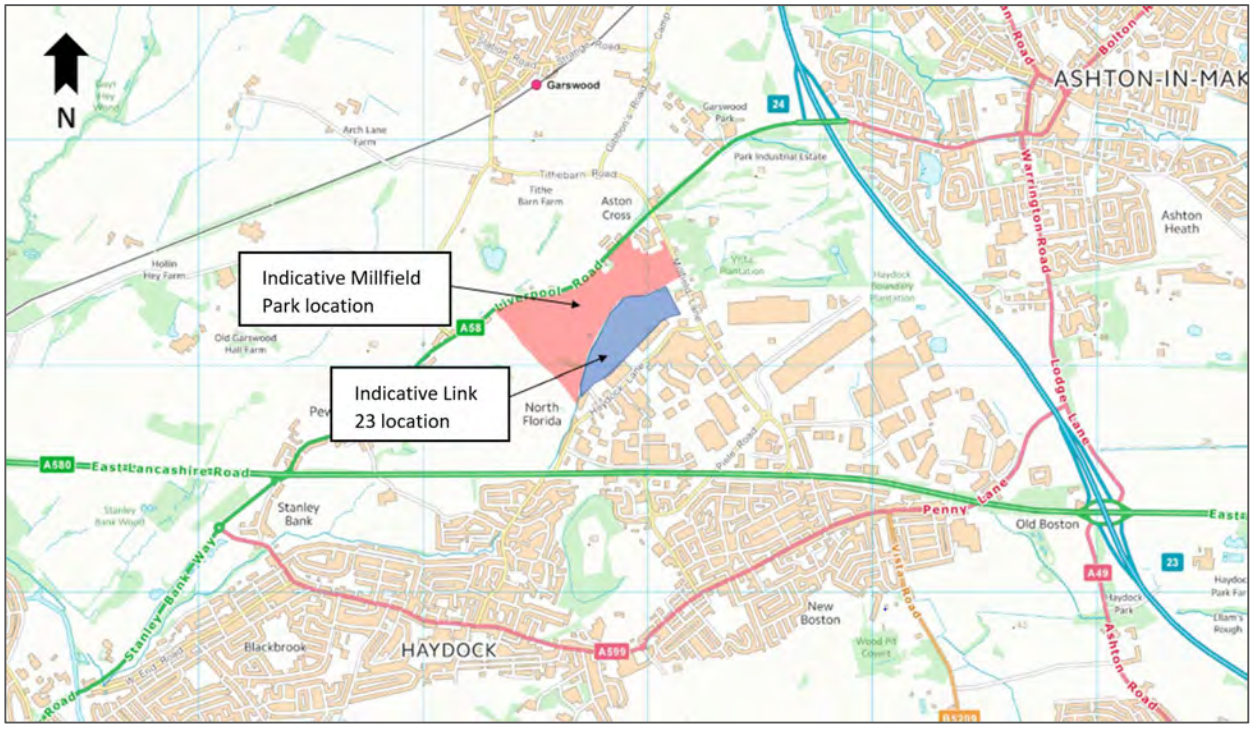
1.8. The remainder of this report is structured as follows:

- Existing Situation;
- St. Helens Local Plan Overview;
- Access Strategy and Operational Analysis; and,
- Summary and Conclusion.

2. Existing Situation

2.1. The proposed 'Millfield Park' development site is situated immediately the north of the adjacent development site 'Link 23'. Both are located to the north of the Haydock Lane Industrial Estate, near Haydock within St. Helens Metropolitan Borough Council area. The sites lie approximately 5.6km to the north east of St. Helens Town Centre and approximately 1km south west of M6 Junction 24. Figure 1 indicates the site locations in the context of the surrounding area:

Figure 1: Site Location



2.2. The Millfield Park site is currently agricultural land and is bounded by the Clipsley Brook to the south-east, the public right of way connecting Haydock Lane with the A58 Liverpool Road to the south-west, the A58 Liverpool Road and a residential development to the north-west and Millfield Lane to the north-east.

2.3. Millfield Lane is a single carriageway road running generally in a north / south direction that connects with the A58 Liverpool Road and the A580 East Lancashire Road. The road is subject to a 30mph speed limit in the vicinity of the site. There is an existing continuous footway along the eastern side of the road with street lighting. The western footway extends from the A58 Liverpool Road to a point near the pedestrian gate of the residential property known as 'Cross House'. A narrow footway then continues to the point where Cross House's vehicle access and the development site boundary meet. The western footway then restarts at a trailer rental company premises and continues to the south toward Haydock Lane and other destinations.

2.4. The A58 Liverpool Road is a single carriageway road that connects with the M6 Junction 24 and the Wigan Council area to the east and meets with the A580 East Lancashire Road to the south west of the site. The road is subject to a 50mph speed limit for approximately the first 80m of this part of the site frontage, thereafter reducing to a 40mph speed-limit. There is a continuous footway on the development frontage side (southern channel) of the road that benefits from street lighting.

2.5. Public transport links are available in the form of bus services; at present the nearest bus stops are located

on Millfield Lane, approximately 400m to the south of the site frontage, with others on the A58 Liverpool Road frontage. An overview of access by sustainable modes has been provided previously within the site development Transport and Access Review.

3. St. Helens Borough Local Plan 2020 - 2035

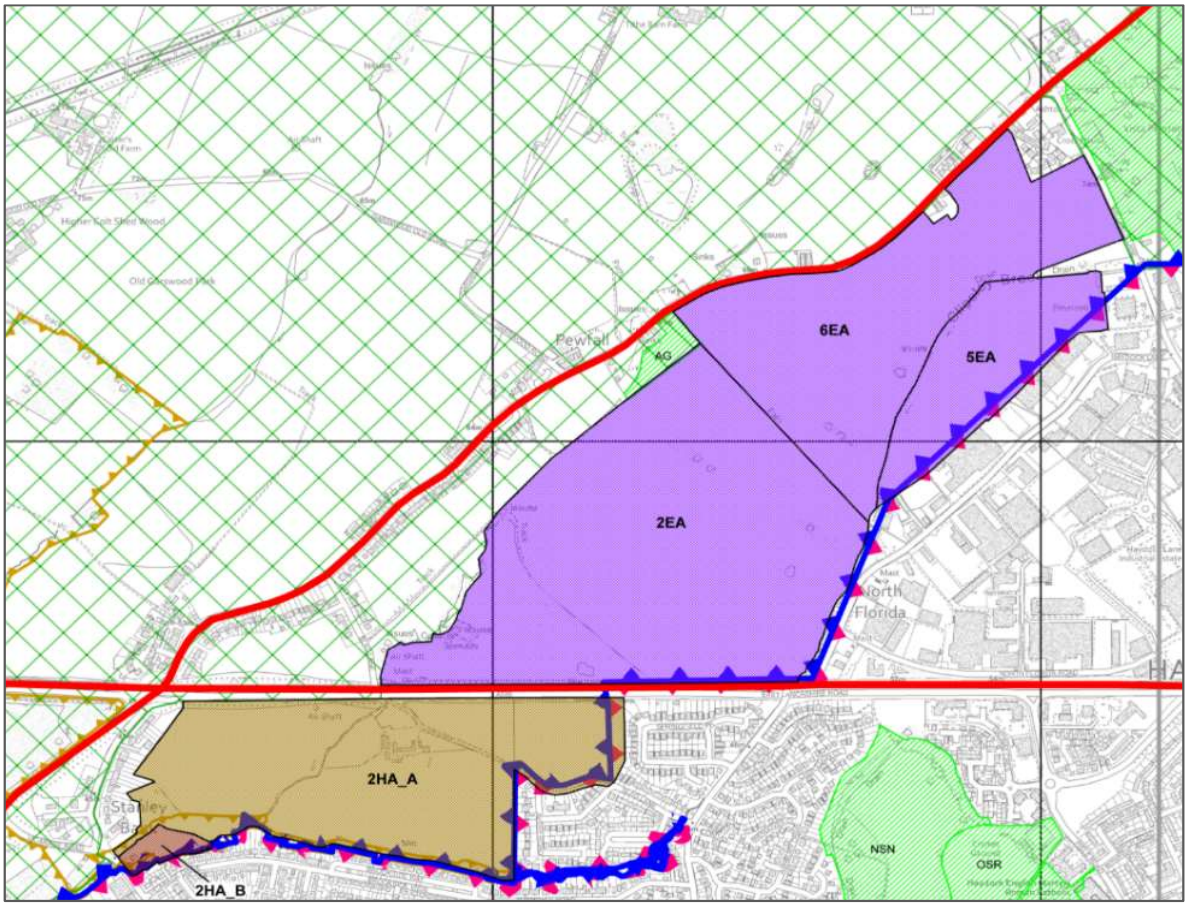
3.1. St. Helens Council is preparing a new Local Plan. This Plan will set how much development for housing, employment and other uses should take place in the borough. It will identify where new development should take place and set out the policies for assessing planning applications.

3.2. The Submission Draft document is the version that the Council wishes to adopt. Previously, the Council consulted on the Preferred Options Local Plan from December 2016 to January 2017, and representations received on that, together with other earlier consultation, has been taken into account when producing the Submission Draft.

3.3. Following the Submission Draft publication (17th January to 13th March 2019), together with the representations received, the Local Plan and its subsequent adoption will proceed to the Secretary of State for Examination in Public led by an independent Planning Inspector.

3.4. The Draft Policies Map showing land allocation extents for sites 5EA (Link 23) and 6EA (Millfield Park) is reproduced in Figure 2 below:

Figure 2: Submission Draft Policies Map (Sites 5EA and 6EA)



4. Access Strategy

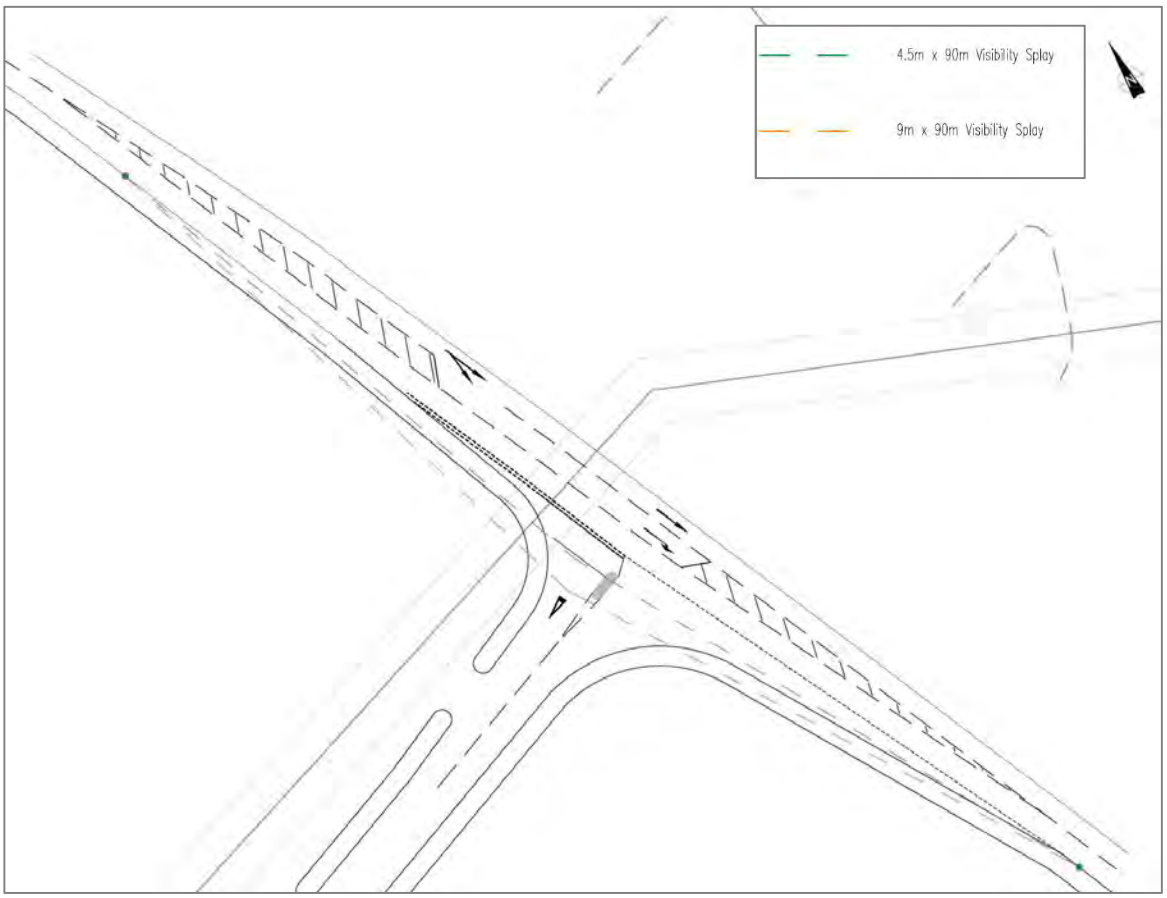
Proposed Access Design

4.1. Vehicle access to the Millfield Park site will be agreed through consultation with St. Helens Council and considered as part of a Transport Assessment (TA) in support of future development at this location. From an initial review, suitable vehicular access could be accommodated via Millfield Lane by way of a priority-controlled junction.

4.2. There are advantages to providing access onto Millfield Road, including increasing route choice for development traffic. The potential access junction provides a convenient route onto the strategic network at M6 Junction 24 and north east towards Wigan via the A58, thereby potentially reducing the impact of development at Haydock Island (M6 Junction 23).

4.3. An indicative junction access layout concept on Millfield Lane is shown in Figure 3 below, with a suitably scaled plan within Appendix A.

Figure 3: Indicative Site Access on Millfield Lane



4.4. The junction concept design includes a 3.5-metre wide ghost island facility to allow sufficient storage of right-turn waiting traffic from Millfield Lane (north) towards the site. Adequate provision can also be made in terms of ensuring land-take within the applicant's control.

4.5. Additional pedestrian refuge islands could also be incorporated into the design to support existing pedestrian movements and those associated with Millfield Park and adjacent development. In order to enhance pedestrian and cycle accessibility, a 3-metre wide shared footway could be incorporated into the

site access design, to lead along the site's internal access road.

Visibility

4.6. The proposed access junction would be situated approximately 60-metres north of the most southerly boundary of the Millfield Park site. This has been identified as the optimum location with reference to visibility and junction design standards.

4.7. Figure 3 demonstrates that a visibility-splay (y-distance) of 90-metres can be achieved to the left (north) and to the right (south) based on a 9-metre x-distance. Visibility to the right / south could be maintained by incorporation of the adjacent 'paddock' land which will form part of the applicant's blue-line boundary. Although Millfield Lane is subject to a 30mph speed-limit within the vicinity of the potential site access junction, visibility has been assessed with reference to DMRB (TD42/95) 60kph / 40mph standards, and is therefore compliant and more robust than DMRB standards.

4.8. Visibility requirements are also stipulated within St. Helens Council document 'Street Design Guide – Highways for Adoption' (2009). Section 6 of the document requires a reduced (4.5-metre) x-distance for non-residential developments, with an y-distance of 90 / 70-metres ('subject to the status of the route') on roads subject to a 30mph speed-limit. Figure 3 shows also that visibility can be achieved in-line with this local St. Helens guidance. The achieved DMRB and St. Helens Council visibility requirements based on a 90-metre y-distance therefore provide a robust assessment which will enforce safe junction operations.

Operational Assessment

Traffic Data

4.9. An operational analysis of the proposed concept access junction layout has been undertaken to determine suitability for development without any material detriment to operation or safety of the adjacent highway network. Supporting traffic flow diagrams are provided within Appendix C.

4.10. Operational assessment has been based on data extracted from the Link 23 Transport Assessment (TA). For purposes of a robust assessment, consideration has been given to a development opening +10-year design horizon of 2031.

4.11. Background traffic flows along Millfield Lane, within the vicinity of the Millfield Park potential access junction have been extracted from the Link 23 TA for the weekday AM and PM peak assessment periods and are presented in Diagrem 1 (Appendix B).

4.12. The 2018 background flows have been factored to the 2031 design year using national trip end model (NTEM) figures extracted from the computer program TEMPro. In consideration of design year traffic growth, two-way traffic flows along Millfield Lane within the vicinity of the Millfield Park potential access will be 1,012 and 1,282 vehicles in the AM and PM peak hours respectively, as shown in Diagram 2. The TEMPro traffic growth outputs are contained within Appendix C.

4.13. It has been assumed that the proposed Link 23 development would be fully operational in consideration of the 2031 design year assessments and these development flows have been incorporated into the assessment. Furthermore, a review of consented developments identified within the Link 23 TA demonstrates that no consented development traffic flows are anticipated to route along Millfield Lane within the vicinity of the potential Millfield Park access junction.

4.14. Millfield Park trip generation has been based on the trip rates utilised within the Link 23 TA, which refer to the method undertaken to support the Florida Farm North application including TRICS (Version 7.2.1) data and additional survey data associated with the Omega North development in Warrington. The peak-period trip rates taken forward are provided below, together with the resultant trip generation associated with the

forecast 95,000sqm for the Millfield Park proposals:

Table 1: Trip Rates & Millfield Park Trip Generation (95,000sqm GIA)

27,873 sqm	AM						PM					
	Arrivals		Departures		Total		Arrivals		Departures		Total	
	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV
Rate	0.072	0.016	0.047	0.017	0.119	0.033	0.069	0.015	0.088	0.015	0.157	0.030
Trips	68	15	45	16	113	31	66	14	84	14	149	29

4.15. Table 1 highlights that the proposed development could generate (2-way) a total of 113 cars and 31 HGVs during the weekday AM peak hour and 149 cars and 29 HGVs during the equivalent PM peak. The trips have been distributed throughout the local highway network in proportion with the existing traffic demand as detailed within the Link 23 TA. Trip distribution is shown in Diagram 4 whilst trip assignment is shown in Diagram 5.

4.16. Total junction flows incorporating 2031 design year and Link 23 + Millfield Park development flows are presented in Diagram 6. For the purpose of operational assessments, flows have been converted to PCUs as detailed within Diagram 7.

Junction Analysis

4.17. The Transport Road Laboratory (TRL) computer programme PICADY has been used to analyse the capacity of the potential Millfield Park Site Access junction. The capacity of priority junctions is generally considered to be acceptable where the ratio of flow against capacity (RFC) is 0.85 or less. Within this ratio, queuing can be contained without knock-on effects to other traffic streams and the average delay per arriving vehicle is reasonable and flows are considered stable as highlighted by level of service (LOS), noted as follows:

A = Free flow

B = Reasonably free flow

C = Stable flow

D = Approaching unstable flow

E = Unstable flow

F = Forced or breakdown flow

4.18. The Millfield Lane / Site Access junction has been modelled based on geometry derived from the initial concept design, as shown in Appendix A.

4.19. The detailed PICADY output is contained in Appendix D and a summary of the 2031 design year (base + Link 23 + Millfield Park) results is presented in Table 2.

Table 2: Summary PICADY Results for 2031 Design Year (Base + Link 23 + Millfield Park)

Stream	AM Peak				PM Peak			
	RFC	Delay (s)	Queue (PCU)	LOS	RFC	Delay (s)	Queue (PCU)	LOS
B - C	0.027	6.99	0.0	A	0.062	10.34	0.1	B
B - A	0.200	11.96	0.2	B	0.392	22.14	0.6	C
C - B	0.051	6.02	0.1	A	0.043	8.10	0.0	A

A=Millfield Lane (S), B= Site Access Road, C=Millfield Lane (N)

4.20. With the predicted increase in traffic through growth, the design year (2031) analysis shows that the junction has adequate reserve capacity. The maximum RFC is 0.392 with a queue of 0.6 PCUs at the site egress (right-turn onto Millfield Lane south) during the PM peak hour. In terms of delay, the level of service indicates stable flow for all approaches.

4.21. The operational assessment therefore demonstrates that a singular priority junction access on Millfield Lane would comfortably accommodate the Millfield Park proposals without detrimental operational or safety impacts on the local highway network in consideration of background traffic growth, Link 23 traffic flows and local consented developments.

Site 6EA Access Requirements

4.22. The site-specific access requirements outlined within the St. Helens Borough Local Plan 2020 – 2035 for Millfield Park (allocated site 6EA) requires; "*Appropriate highway access via Millfield Lane and allocated 2EA site*" (Florida Farm). However, the preliminary operational assessment undertaken above demonstrates that an additional vehicular access point to Millfield Park via the allocated 2EA site would not be necessary. Additional constraints may also be experienced should access to the Millfield Park site be required via third-party land (Florida Farm).

4.23. Whilst analysis undertaken within this report demonstrates that a singular vehicular access from Millfield Lane would be sufficient, this would be confirmed with further detailed analysis undertaken within a TA in support of any subsequent planning application for the site. The TA assessments will be fully scoped with St. Helens Council, Highways England and Wigan Council and will consider the finalised masterplan proposals and additional detail required to finalise the site access junction design.

4.24. Based on the above, it is proposed that Local Plan site specific access requirements be amended/finalised as follows;

"Appropriate highway access via Millfield Lane or a combination with the allocated 2EA site (Florida Farm)."

4.25. Determination of whether a singular point of access from Millfield Lane or an additional access via Florida Farm would be suitable would be thoroughly assessed within any subsequent TA for Millfield Park. The TA would also assess and identify any mitigation measures which may be required throughout the local highway network and Junction 23 of the M6 with reference to additional transportation requirements associated with allocated site 6EA; "*Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network*."

5. Summary & Conclusion

5.1. Waterman Infrastructure & Environment has been commissioned by Canmoor Developments Ltd to consider the transport and access requirements for a warehouse and distribution facility 'Millfield Park', (incorporating land use classes B1c/B2/B8) located in Haydock, St. Helens. This work is intended to inform the masterplanning process at a high strategic level, in combination with confirming Representation to the land allocation requirements identified within the new St. Helens Borough Local Plan 2020-2035 Submission Draft.

5.2. The preliminary masterplan shows a total of nine units constructed at the Millfield Park site. It is proposed the development would be accessed from a priority-controlled access junction on the Millfield Lane frontage. At this time, it is anticipated that Millfield Park would become operational in 2021.

5.3. The site benefits from being included within the New St. Helens Borough Local Plan 2020 – 2035 Submission Draft as potential land allocation 6EA.

5.4. The preliminary junction access arrangement for the Millfield Park site includes provision of 3.5-metre wide ghost island facility to allow storage of right-turn waiting traffic from Millfield Lane (north). A visibility assessment has also been undertaken which demonstrates that adequate visibility can be achieved in-line with both DMRB and St. Helens Council design standards.

5.5. An operational assessment has been undertaken in recognition of the preliminary junction access design and a +10-year design horizon of 2031, with assessment considering background traffic growth, consented developments and additional traffic flows associated with both Link 23 and Millfield Park.

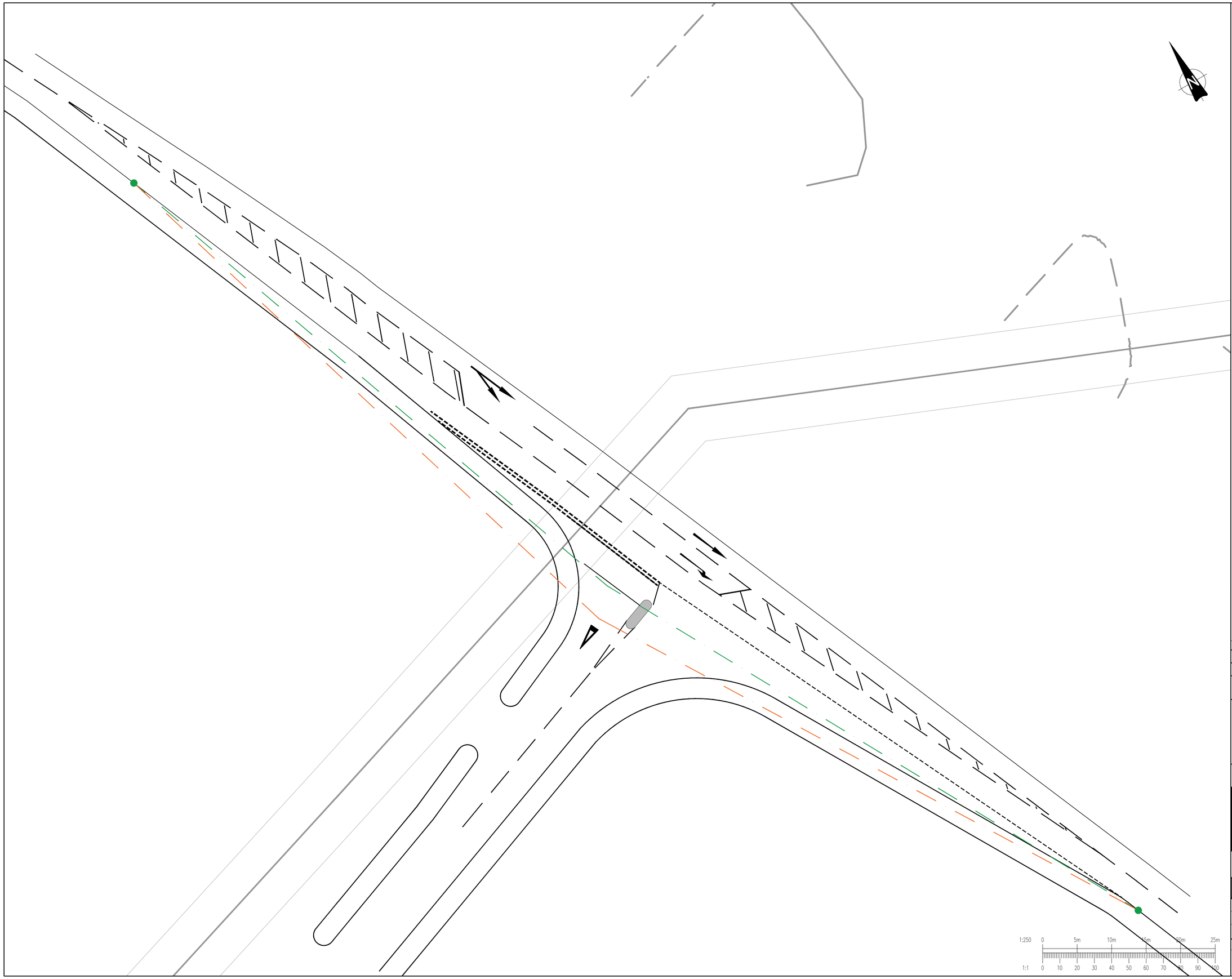
5.6. Design-year operational assessment results demonstrate that the junction would operate well, indicating that additional vehicular points of access into the Millfield Park site would not be necessary as outlined in the St. Helens Borough Local Plan 2020 – 2035 site specific access requirements. It has therefore been proposed that Local Plan site specific access requirements for site 6EA be amended / finalised as follows;

"Appropriate highway access via Millfield Lane or a combination with the allocated 2EA site (Florida Farm)."

5.7. Determination of whether a singular point of access from Millfield Lane or an additional access via Florida Farm would be suitable would be thoroughly assessed within any subsequent TA for Millfield Park. The TA would also assess and identify any mitigation measures which may be required throughout the local highway network and Junction 23 of the M6 with reference to additional transportation requirements associated with allocated site 6EA.

APPENDICES

A. Indicative Millfield Park Junction Arrangement



KEY:

4.5m x 90m Visibility Splay

9m x 90m Visibility Splay

Rev	Date	Description	By
A	04.03.18	First Issue	PJ

Amendments

Project
Haydock Lane, St Helens

Title
Haydock Lane, St Helens
General Arrangement

Client

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Drawing Status
PRELIMINARY

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Drawn by	PJ	Date	04/03/19
Scales @ A1 work to figured dimensions only	1:250 at A1		

Project No
WIE15628

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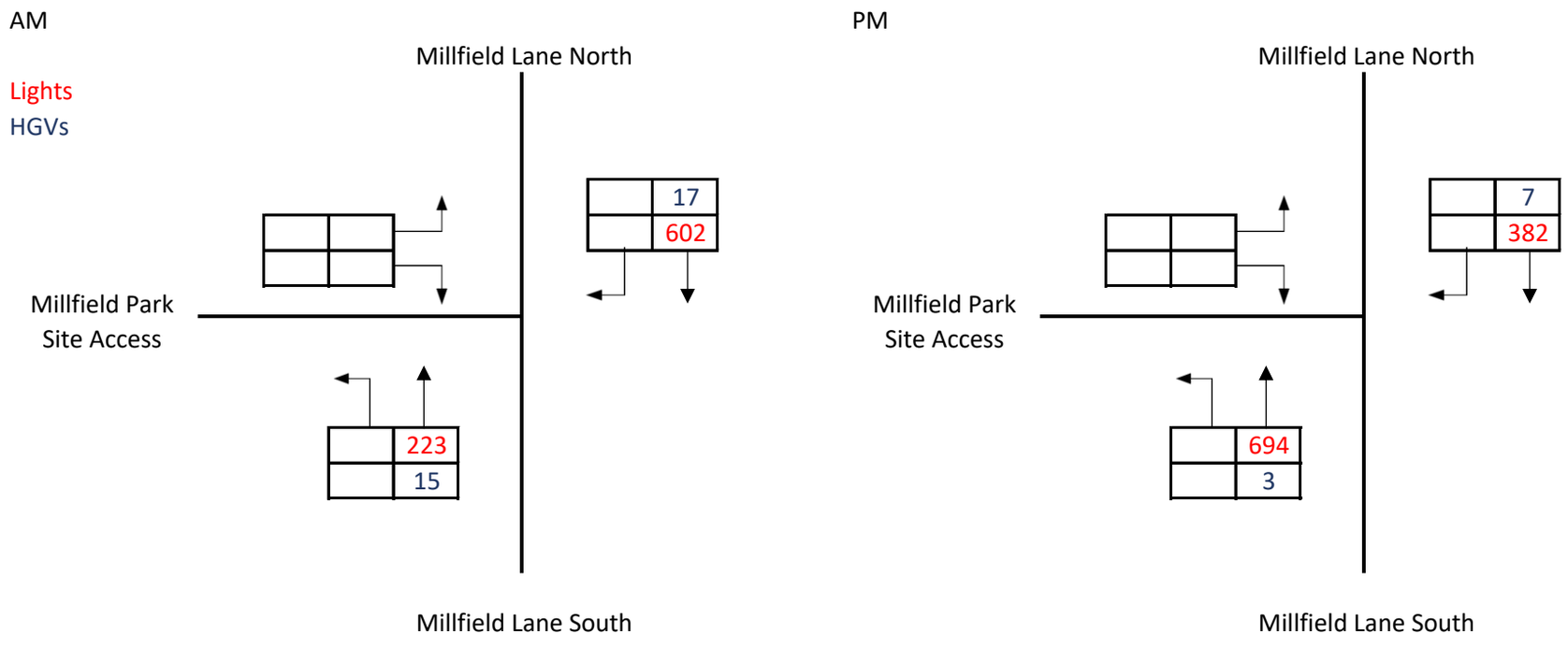
15628/WIE-LAYOUT Masterplan Layer Detached.dwg

Publisher	Zone	Category	Number	Revision
WIE	A	90	100	A01

File Path C:\Users\LSA\Desktop\

31020-FE-006, A1-Wat-S, OS SURVEY

B. Traffic Flow Diagrams

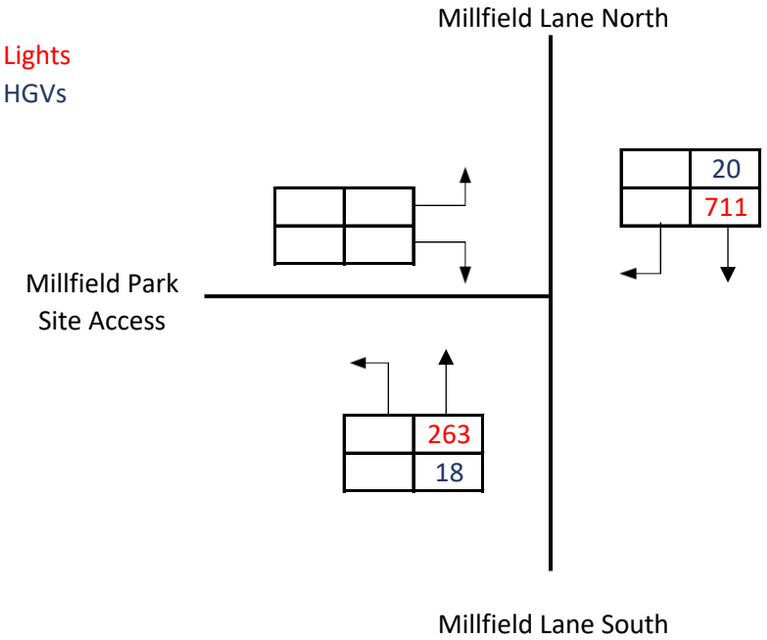


* Based on Florida Farm Survey Data

Waterman Infrastructure & Environment	WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock February, 2019	Diagram 1 2018 Base Flows

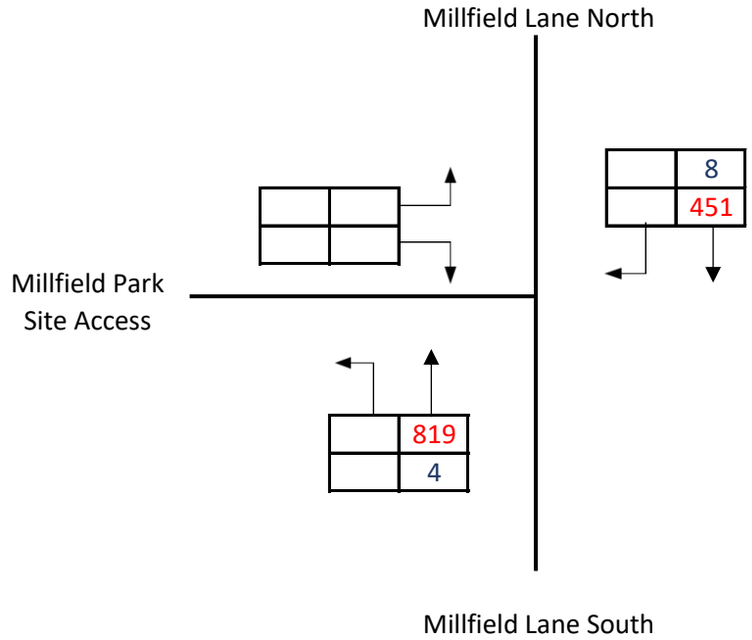
AM

Lights
HGVs



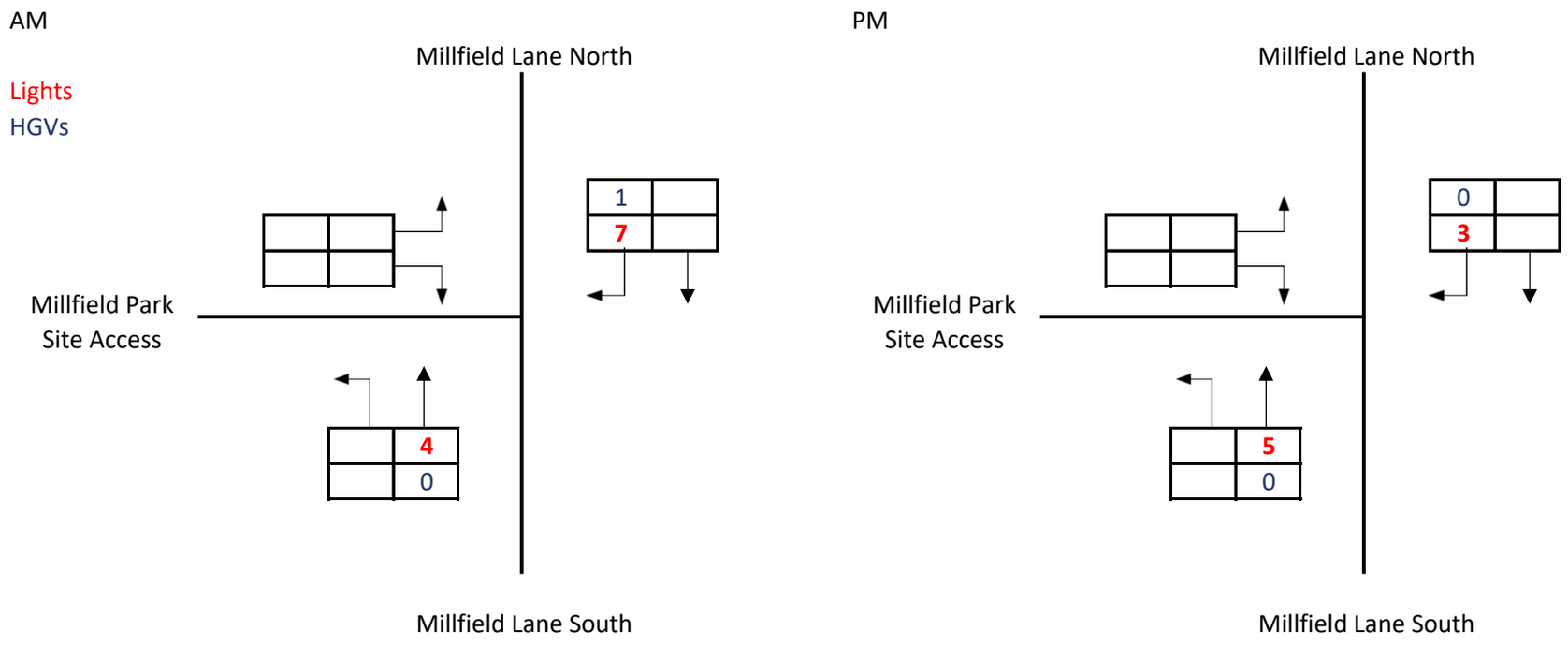
2018 - 2031
Growth Factor 1.1809

PM



Growth Factor 1.1801

Waterman Infrastructure & Environment	WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock February, 2019	Diagram 2 2031 Design Year Base Flows



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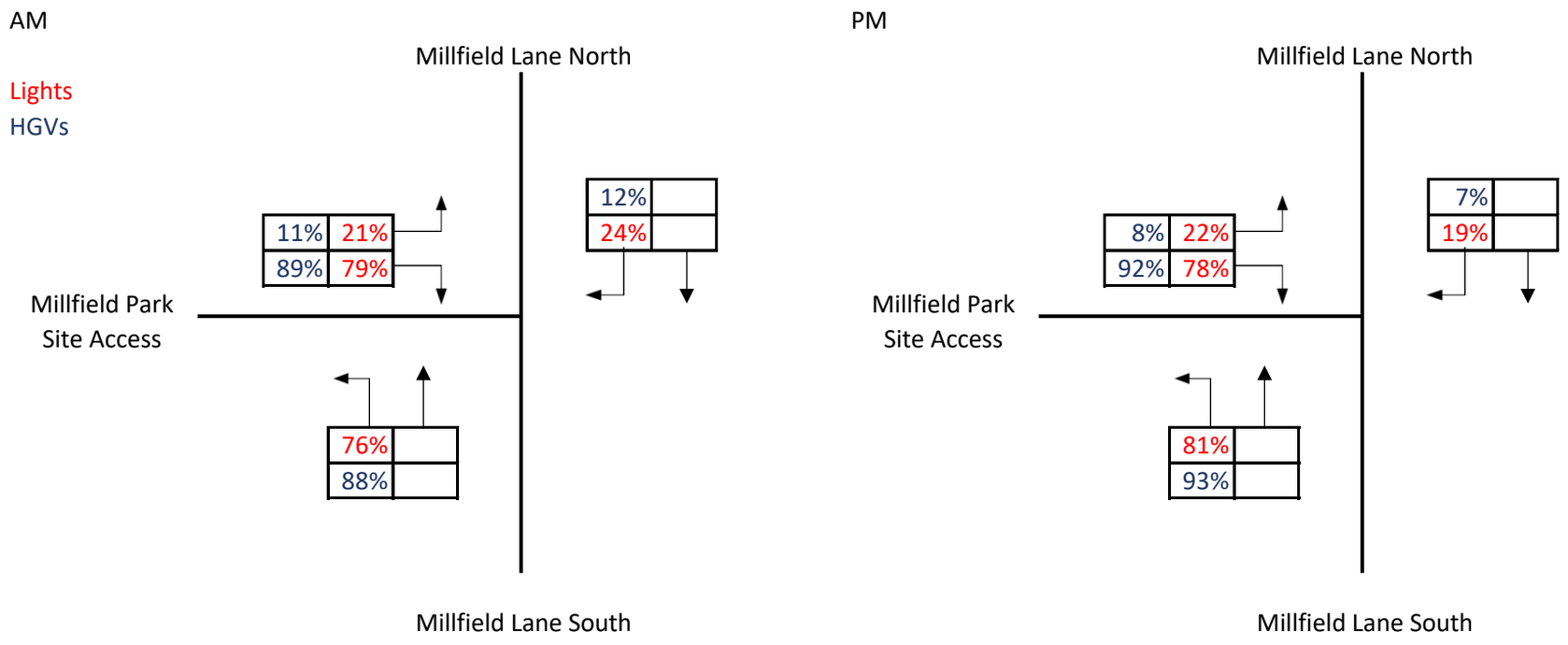
WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 3

Link 23 Development Flows
(27,873sqm GIA)



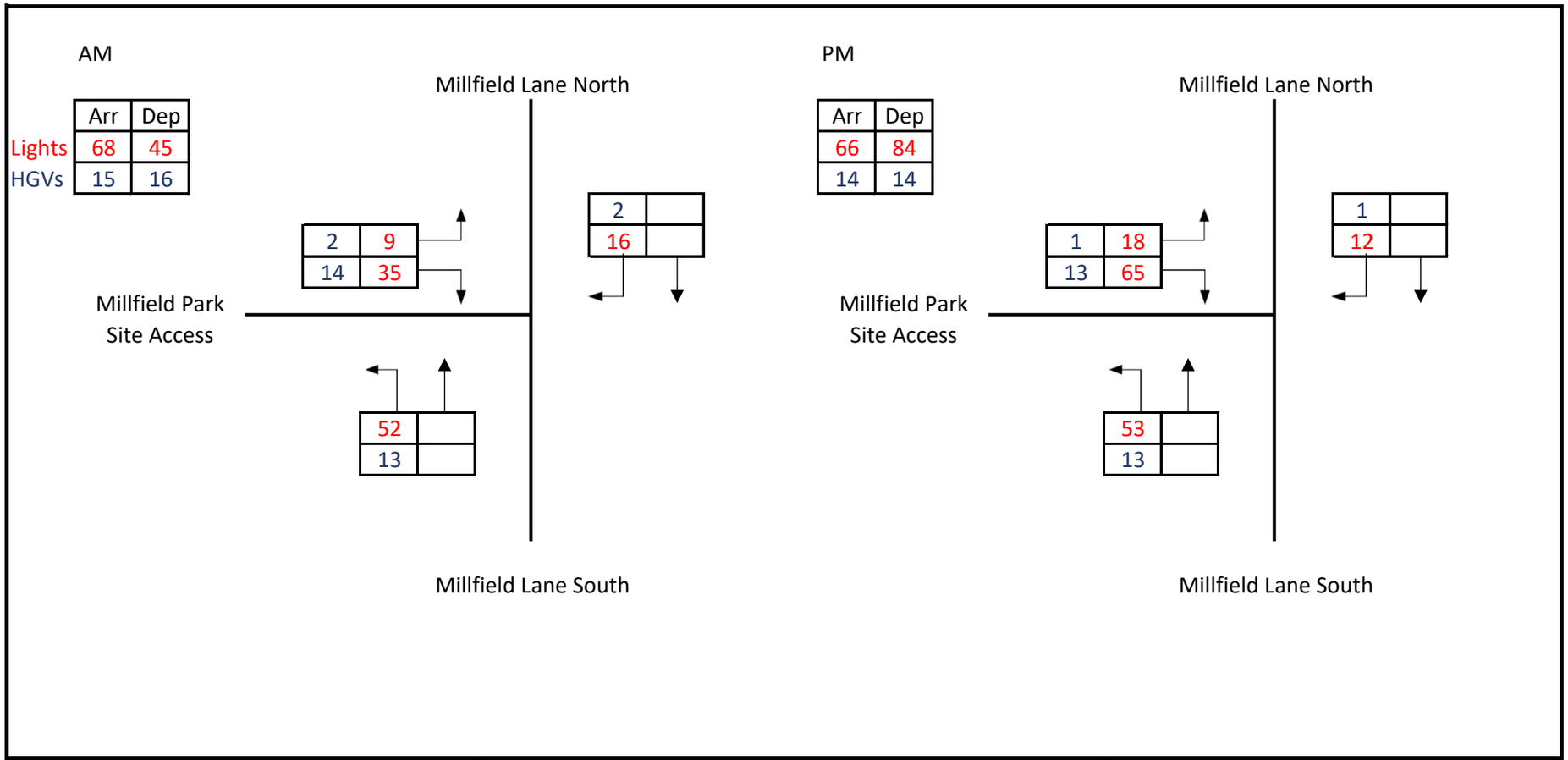
Infrastructure & Environment

WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 4

Millfield Park Distribution



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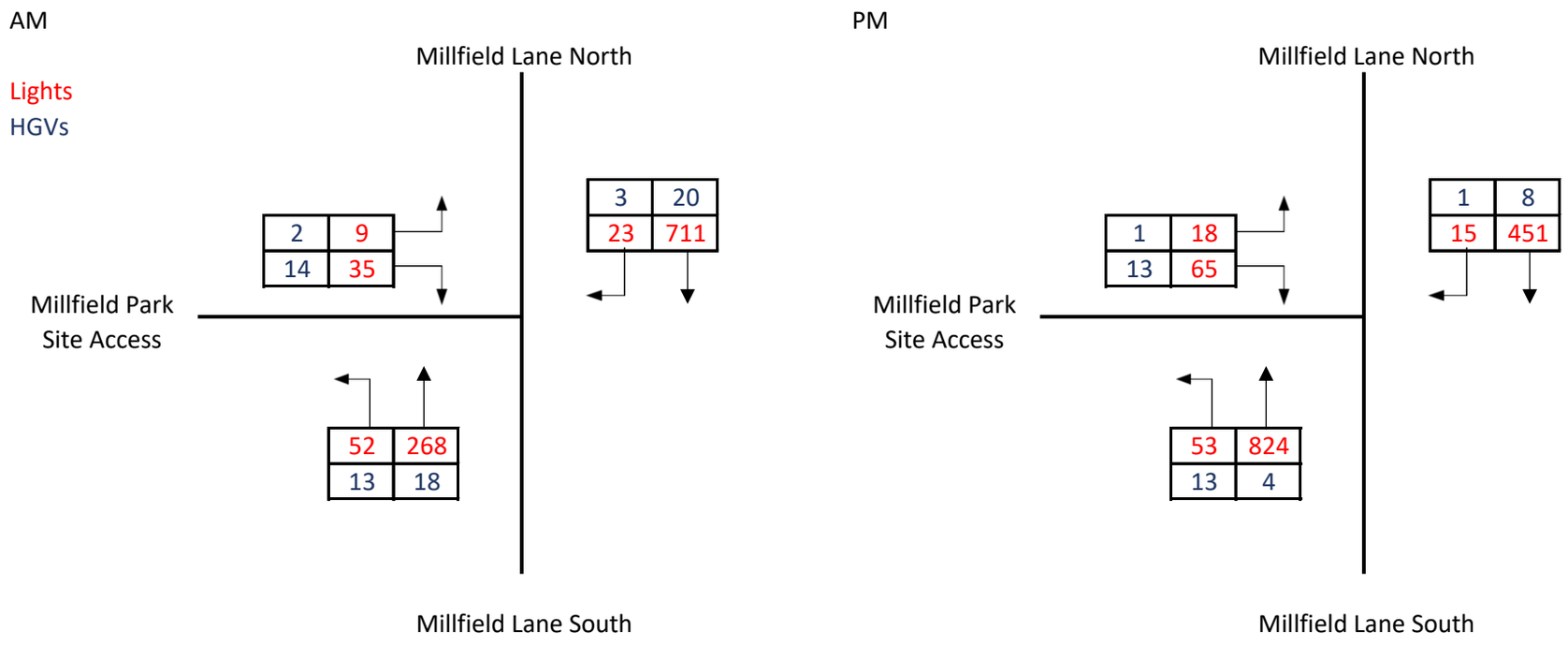
Infrastructure & Environment

WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 5

Millfield Park Development Flows
(95,000sqm GIA)



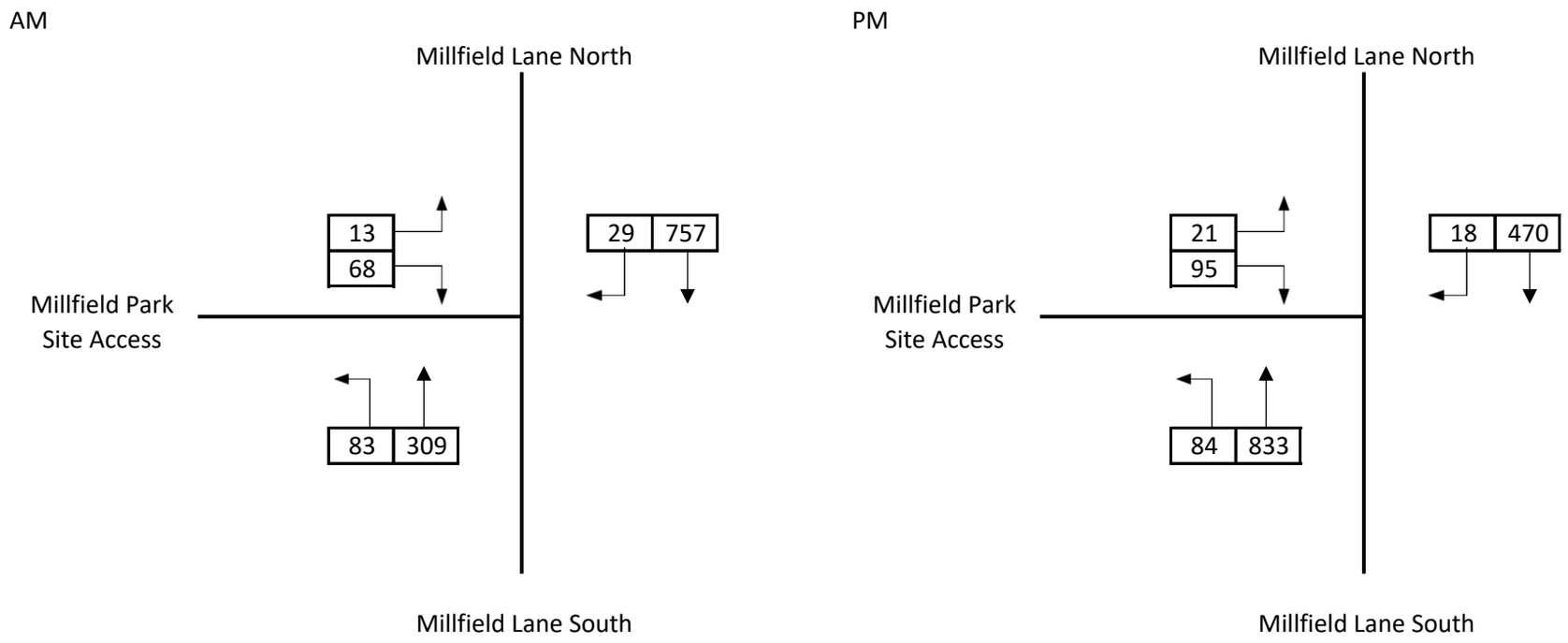
Infrastructure & Environment

WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 6

2031 Base + Link 23 + Millfield Park (Vehicles)



Infrastructure & Environment

WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 7

2031 Base + Link 23 + Millfield Park (PCUs)

C. TEMPRO Growth Outputs

TEMPro Outputs

2018 - 2031 (AM)

2018 - 2031 (PM)

D. Model Outputs

Junctions 9

PICADY 9 - Priority Intersection Module

Version: 9.5.0.6896
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Filename: millfield_site access.j9
Path: \\S-GW\wiel\Projects\WIE15628_Haydock Lane St Helens\100\5_Technical\Transportation\Modelling
Report generation date: 06/03/2019 17:11:07

»(Default Analysis Set) - 2031 Design + P1 + Dev, AM
»(Default Analysis Set) - 2031 Design + P1 + Dev, PM

Summary of junction performance

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
	A1 - 2031 Design + P1 + Dev			
Stream B-C	0.0	0.03	0.1	0.06
Stream B-A	0.2	0.20	0.6	0.39
Stream C-B	0.1	0.05	0.0	0.04

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	(untitled)
Location	
Site number	
Date	27/01/2017
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	GWJRC
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2031 Design + P1 + Dev	AM	ONE HOUR	08:00	09:30	15	✓
D2	2031 Design + P1 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

Analysis Set Details

ID	Name	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	(Default Analysis Set)	✓	100.000	100.000

(Default Analysis Set) - 2031 Design + P1 + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Millfield Lane / Site Access	T-Junction	Two-way		0.86	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description	Arm type
A	Millfield Lane (S)		Major
B	Site Access		Minor
C	Millfield Lane (N)		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Width for right turn (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	6.40		✓	3.50	150.0		-

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B	One lane plus flare	10.00	9.50	6.50	5.70	5.50	✓	3.00	90	90

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Junction	Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
1	B-A	656	0.117	0.297	0.187	0.424
1	B-C	651	0.098	0.248	-	-
1	C-B	754	0.287	0.287	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2031 Design + P1 + Dev	AM	ONE HOUR	08:00	09:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	392	100.000
B		ONE HOUR	✓	81	100.000
C		ONE HOUR	✓	786	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		A	B	C
From	A	0	83	309
	B	68	0	13
	C	757	29	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.03	6.99	0.0	A	12	18
B-A	0.20	11.99	0.2	B	62	94
C-A					695	1042
C-B	0.05	6.01	0.1	A	27	40
A-B					76	114
A-C					284	425

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	571	0.017	10	0.0	0.0	6.417	A
B-A	51	13	464	0.110	51	0.0	0.1	8.695	A
C-A	570	142			570				
C-B	22	5	670	0.033	22	0.0	0.0	5.555	A
A-B	62	16			62				
A-C	233	58			233				

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	554	0.021	12	0.0	0.0	6.641	A
B-A	61	15	427	0.143	61	0.1	0.2	9.837	A
C-A	681	170			681				
C-B	26	7	653	0.040	26	0.0	0.0	5.740	A
A-B	75	19			75				
A-C	278	69			278				

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	14	4	529	0.027	14	0.0	0.0	6.992	A
B-A	75	19	375	0.200	75	0.2	0.2	11.959	B
C-A	833	208			833				
C-B	32	8	630	0.051	32	0.0	0.1	6.014	A
A-B	91	23			91				
A-C	340	85			340				

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	14	4	529	0.027	14	0.0	0.0	6.994	A
B-A	75	19	375	0.200	75	0.2	0.2	11.985	B
C-A	833	208			833				
C-B	32	8	630	0.051	32	0.1	0.1	6.014	A
A-B	91	23			91				
A-C	340	85			340				

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	553	0.021	12	0.0	0.0	6.645	A
B-A	61	15	427	0.143	61	0.2	0.2	9.863	A
C-A	681	170			681				
C-B	26	7	653	0.040	26	0.1	0.0	5.743	A
A-B	75	19			75				
A-C	278	69			278				

09:15 - 09:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	570	0.017	10	0.0	0.0	6.421	A
B-A	51	13	464	0.110	51	0.2	0.1	8.726	A
C-A	570	142			570				
C-B	22	5	670	0.033	22	0.0	0.0	5.557	A
A-B	62	16			62				
A-C	233	58			233				

(Default Analysis Set) - 2031 Design + P1 + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Millfield Lane / Site Access	T-Junction	Two-way		1.62	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D2	2031 Design + P1 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	917	100.000
B		ONE HOUR	✓	116	100.000
C		ONE HOUR	✓	488	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		A	B	C
From	A	0	84	833
	B	95	0	21
	C	470	18	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.06	10.34	0.1	B	19	29
B-A	0.39	22.14	0.6	C	87	131
C-A					431	647
C-B	0.04	8.10	0.0	A	17	25
A-B					77	116
A-C					764	1147

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	16	4	469	0.034	16	0.0	0.0	7.943	A
B-A	72	18	389	0.184	71	0.0	0.2	11.264	B
C-A	354	88			354				
C-B	14	3	556	0.024	13	0.0	0.0	6.634	A
A-B	63	16			63				
A-C	627	157			627				

17:00 - 17:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	5	430	0.044	19	0.0	0.0	8.752	A
B-A	85	21	338	0.253	85	0.2	0.3	14.204	B
C-A	423	106			423				
C-B	16	4	518	0.031	16	0.0	0.0	7.178	A
A-B	76	19			76				
A-C	749	187			749				

17:15 - 17:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	6	372	0.062	23	0.0	0.1	10.317	B
B-A	105	26	267	0.392	103	0.3	0.6	21.843	C
C-A	517	129			517				
C-B	20	5	464	0.043	20	0.0	0.0	8.095	A
A-B	92	23			92				
A-C	917	229			917				

17:30 - 17:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	6	371	0.062	23	0.1	0.1	10.343	B
B-A	105	26	267	0.392	105	0.6	0.6	22.142	C
C-A	517	129			517				
C-B	20	5	464	0.043	20	0.0	0.0	8.097	A
A-B	92	23			92				
A-C	917	229			917				

17:45 - 18:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	5	429	0.044	19	0.1	0.0	8.773	A
B-A	85	21	338	0.253	87	0.6	0.3	14.382	B
C-A	423	106			423				
C-B	16	4	518	0.031	16	0.0	0.0	7.183	A
A-B	76	19			76				
A-C	749	187			749				

18:00 - 18:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	16	4	468	0.034	16	0.0	0.0	7.959	A
B-A	72	18	389	0.184	72	0.3	0.2	11.364	B
C-A	354	88			354				
C-B	14	3	556	0.024	14	0.0	0.0	6.635	A
A-B	63	16			63				
A-C	627	157			627				

PO3747

EL0210

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation - submitted on behalf of BXB (Cowley Hill) Ltd
Gemma Williams
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:38

[redacted]

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

2 Attachments

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

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

Kind regards

Gemma Williams
Administrator

[redacted]

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

NEXUS PLANNING

RTPI AWARDS FOR PLANNING EXCELLENCE FINALIST 2019

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

[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: Gary	First name: Peter
Last Name: Goodman	Last Name: Tooher
Organisation/company: BXB (Cowley Hill) Ltd	Organisation/company: Nexus Planning
Address:	Address: Eastgate, Castle Street, Manchester
Postcode:	Postcode: M3 4LZ

[redacted]

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 x (Via Email)	No ☐

EL0210

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy **LPA05**		Paragraph / diagram / table **Appendix 5, bullet points 2 (Green Infrastructure) and 5(B1 uses)**		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 ☐	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?	☐
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
BXB (Cowley Hill) Ltd strongly supports the allocation of Cowley Hill site for residential led development. BXB (Cowley Hill) Ltd supports the Council in progressing the Local Plan. The Local Plan preparation process and the requirements of the site however necessitate BXB (Cowley Hill) Ltd commenting on the draft Local Plan to the effect that two specific elements of

EL0210

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

Please continue on a separate sheet if necessary

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

Please refer to the attached letter (Nexus Planning 13.03.19)

Please continue on a separate sheet if necessary

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

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

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

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

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

CL0210

NEXUS PLANNING

Manchester
Eastgate
2 Castle Street
Castlefield
Manchester M3 4LZ

nexusplanning.co.uk

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

E: planningpolicy@sthelens.gov.uk

13th March 2019

Dear Sir

The New St Helens Borough Council Local Plan 2020 – 2035
Submission Draft – 'Regulation 19' consultation
Representation submitted on behalf of BXB (Cowley Hill) Limited in relation to Cowley Hill, St Helens (6HA)

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

A completed Representation Form is attached to this representation.

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

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

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

Appendix 5

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

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

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

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

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

*Local Wildlife Site 47

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

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

should clearly facilitate a flexible, innovative approach to be taken to masterplanning and the subsequent development of the site, whilst maintaining key principles.

In particular, BXB (Cowley Hill) Ltd consider that the 'requirements' relating to green infrastructure and employment land should be revised.

Green Infrastructure Requirements

BXB (Cowley Hill) Ltd acknowledge the need to appropriately safeguard and enhance areas of biodiversity and wildlife value. However, significant reclamation works are required to stabilise the site and create an environment appropriate for new homes. This work will be required across the site and will impact areas previously identified as having wildlife value. Similarly, the approach to creating and enhancing green infrastructure will, to make best possible use of the site, need to be integrated with approaches to screening the site from continuing industrial uses along its western edge. The appropriate approach adopted through masterplanning will also need to reflect updated ecology and other surveys.

It is therefore considered that the Council should seek the amendment of this *'indicative requirement'* via a proposed modification as follows:

- **The green infrastructure strategy on the site should seek to maintain the ecological value of the site, balancing other masterplanning, engineering, remediation, viability and other development requirements.**
- **The draft Local Plan is currently considered to be 'unsound' in this respect.**

Employment Land

Through the masterplanning process, BXB (Cowley Hill) Ltd will consider the scope for employment and other uses as part of creating a sustainable housing led development. However, market and viability issues will be a key consideration. BXB Ltd welcomed that this is reflected, to a degree, in the requirements providing the scope to use the suggested area for housing if employment does not come forward. However, in the context of facilitating a flexible, innovative approach to masterplanning, it is considered that reference should also be made to other appropriate commercial uses in this area consistent with the creation of a new residential neighbourhood. The requirement should also more clearly reflect viability considerations and the overarching objective of delivering a high quality, sustainable neighbourhood.

It is therefore considered that the Council should seek to amend this *'indicative requirement'* via a proposed modification, as follows:

- **The development area allows for the inclusion, subject to viability and masterplanning considerations, 4ha of land for a mix of uses including appropriate retail, leisure, employment and commercial uses (if this area is not used for these uses it will make more land available for housing).**

The draft Local Plan is currently considered to be unsound in this respect.

BXB (Cowley Hill) Ltd acknowledge the need to provide appropriately for open space as part of a high quality residential environment. Policy LPD03, referred to in the requirements establishes open spaces standards, whilst also noting that in some cases the expansion or enhancement of off-site open space within the locality

PO3748

EF0008

St Helens Local Plan - Representations OBO Parkside Regeneration LLP
William Mulvany
to:
planningpolicy@sthelens.gov.uk
04/03/2019 12:14

[redacted]

(1) - LPA02
(2) - FIGURE 4.1
(3) - FIGURE 4.2
(4) - LPA04.1
(5) - LPA10
(6) - APPENDIX 5

9 Attachments

lpsd-representation-form Policy LPA02.pdf lpsd-representation-form Policy LPA04.1.pdf

lpsd-representation-form Policy LPA04.pdf lpsd-representation-form Policy LPA10.pdf

lpsd-representation-form Appendix 5.pdf Parkside Masterplan red.pdf Parkside Rail Safeguarding red.pdf

FPC-ARP-XX-XX-FN-RX-00001 red.pdf 2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf

Dear Planning Policy

Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

Kind regards
WILL MULVANY
Associate: Chartered Town Planner
BSc (Hons), MA, MRTPI

Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB

[redacted]

Scanned By Trend Micro Hosted Email Security (Mon Mar 4 12:14:25 2019)

St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Parkside Regeneration LLP	Organisation/company: Spawforths
Address: C/O Agent Postcode:	Address: Junction 41 Business Court, East Ardsley, Leeds Postcode: WF3 2AB

[redacted]

Signature: [redacted] **Date:** 4 March 2019

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

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

Yes ☒ (Via Email) No ☐

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

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)				Appendix 5: Site Profiles - Allocated Housing and Employment Sites.					

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

Langtree PP **conditionally objects** to the Local Plan at Appendix 5 in respect of Draft allocation 7EA - Parkside East, Newton-le-Willows as it identifies 5.58 Ha of land to be safeguarded on the Parkside West site to facilitate a potential future rail reversing leg in respect of delivery of site 7EA.

Whilst we accept the need for land to be safeguarded for a potential future rail reversing leg, detailed technical work has been undertaken to set out the required safeguarded land to meet this future potential need and the current alignment of the safeguarded rail area as identified in the Local Plan Policies Map (and related figures and plans within the document itself) is erroneous and needs to be amended to reflect the alignment as submitted in the live planning application Ref. P/2018/0048/OUP and justified accordingly. We attach supporting information in this regard to this representation.

Please continue on a separate sheet if necessary

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

The alignment of the rail leg safeguarding area for Parkside East (Allocation 7EA) that would need to be provided on Parkside West (Allocation 8EA) is incorrectly shown on the Policies Map and the site plans in Appendix 5.

There is a need to amend the site plans alongside the Policies Map to reflect the correct rail safeguarding requirement.

With regards to Allocation 8EA – Parkside West, the site requirements are acceptable in principle as they reflect the approach taken within the current live planning application other than in respect of the future sidings facilities (as above). They appear to identify sufficient flexibility to reflect any changing circumstances through the Local Plan period.

Please continue on a separate sheet if necessary

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

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

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

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

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the employment strategy and site specific considerations such as the rail safeguarding area for site 7EA, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector.

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

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

Your ref
Our ref 237135-00/SMS/JL
File ref CO

ARUP

10th Floor The Plaza
100 Old Hall Street.
Liverpool L3 9QJ
United Kingdom
[redacted]
www.arup.com

[redacted]
Langtree Property Partners
St James Business Centre
Wilderspool Causeway
Warrington
WA4 6PS

14 September 2018

Dear

Former Parkside Colliery
Comments on AECOM Review of Developers Rail Corridor Proposals

Thank you for sending us a copy of the AECOM Technical Note (Ref: 60565669-AEC-PARK-TN-1010) dated 24 May 2018, we have reviewed the Technical Note and confirm:

a) we remain content that the safeguarded area proposed for rail sidings (as part of a SRFI) is workable and responds well to the development needs of Parkside Regeneration LLP and provides a balanced position in respect of the competing needs of a future SRFI developer;

b) it is acknowledged that the design uses minimum design radii, we believe that these radii are manageable but clearly acknowledge AECOM's points that larger radii are 'preferable' and that mitigations will be needed;

c) we believe that the use of words like 'bespoke componentry' to mitigate tight radius curves/ rail squeal problems is somewhat misleading as the componentry is standard 'off the shelf' equipment, specified for individual situations and locations;

d) the increased cost of rail related mitigations was not a consideration we were asked to consider by Parkside Regeneration LLP in respect of developing the safeguarded area for a workable rail solution;

e) whilst the proposed rail safeguarded area (and rail alignments) will involve more embankment or retaining works than the AECOM boundary, this is a matter of cost and not technical feasibility/suitability; and,

f) further assessment of the West Coast Main Line cutting as a constraint we advise, would be an excessive level of investigation at this stage when the current exercise is related to not precluding an SRFI in the future, again mitigations to prevent loading the WCML would in the future be a matter of cost not feasibility.

We trust that this gives Parkside Regeneration LLP sufficient confidence to continue supporting the proposed safeguarded area in the development proposals.

[redacted]

Ove Arup & Partners Ltd | Registered in England & Wales
Registered Number: 1312453 | Registered Address: 13 Fitzroy Street London W1T 4BQ

File Note

ARUP

6th Floor 3 Piccadilly Place
Manchester M1 3BN
United Kingdom
www.arup.com

[redacted]

Project title	Former Parkside Colliery	Job number	237135-00
cc	Alek Gruszczynski	File reference	FPC-ARP-XX-XX-FN-RX-00001
Prepared by	Daniel Beech	Date	15 June 2017
Subject	Effect of the proposed Parkside development on the provision of an SRFI on the East Parkside site		

1 Introduction

The purpose of this technical note is to review the requirements for a strategic rail freight interchange (SRFI) and determine whether the Parkside Regeneration LLP masterplan is not prejudicial to the delivery of an SRFI on the Parkside East site as shown in the St Helens local plan 2018 – 2033.

2 SRFI Requirements

Work has been done previously by Arup to define the requirements for an SRFI based on a review of selected documents published by the UK government on the subject. The summary of this review is contained in Appendix A.

A large number of the requirements for an SRFI are operationally and commercially based and as such are not directly influenced by design. Only a small number of requirements are technical in nature, these are;

- Rail access from all mainline directions
- Size range 60 – 400Ha
- Operational rail connection, a number of rail connected buildings, intermodal handling and container storage
- Capable of handling over 4 goods trains per day
- Capable of receiving 775m long trains
- At least W8 gauge
- Trackside access/ maintenance roads

For the purpose of this note the layout of an SRFI shall be considered suitable if it fulfils the criteria listed above.

A number of the criteria above are dependent upon the mainline and therefore are not considered in this note as it is independent of the layout of the SRFI on the Parkside site. These are the gauge of the rail line and the capacity of it. An SRFI will not be capable of handling 4no. goods trains per day if there is not sufficient capacity in the surrounding rail network to accommodate these additional trains. It is considered that the SRFI on the East Parkside site will be designed such that it can handle in excess of 4no. trains per day.

Equally fulfilment of some of the criteria is based solely on the layout of the SRFI on the East Parkside site. As this is not affected by the layout of the Parkside West masterplan the requirements are not considered in this note.

Considering the above statements there are only a couple of requirements that need to be met by the sidings on the West Parkside site to allow for the provision of an SRFI on the East Parkside site. These are;

- Rail access from all directions
- Capable of receiving 775m trains

Should these requirements be met then it is considered that the layout provisions are not prejudicial to delivery of an SRFI.

3 Parkside Regeneration LLP Masterplan

The masterplan (Appendix B) created for the West Parkside site by the Parkside Regeneration LLP safeguards an area for the reversing loop/arrival siding to be used by an SRFI facility on the East Parkside site.

For this note, a drawing has been prepared (Appendix C) which compares the safeguarded area in the Parkside Regeneration LLP masterplan against the safeguarded area of the St Helens Local Plan (see below).

The area of track shown in the masterplan connects to the Manchester to Liverpool mainline, the sidings then curve around the top of the site to run parallel to the West Coast Mainline near the western boundary before curving again toward the centre of the site. This layout gives a maximum length between switches in excess of 775m and is therefore able to accommodate the required train lengths.

The area safeguarded in the masterplan makes allowance for a dual track siding that can be utilised as a reversing loop for breaking up freight trains and to receive 775m trains directly from the north & east. Trains travelling from the south & west are able to be received directly to the SRFI on the Parkside East site.

Provisions are made in this layout for earthwork bunds between the rail sidings and West Coast Mainline to provide an acoustic and visual bund to the properties adjacent to the mainline.

An area adjacent the track has also been reserved to be utilised as a maintenance track suitable for use by a van to service both the track and trains, with allocations for turning circles and passing points at regular intervals.

A siding in this location will interrupt access to Newton House Farm whilst a train is in the siding. The area of the safeguarded land contains sufficient space to provide a level crossing designed to Network Rail standards.

The Network Rail Track Design Handbook states that curves in sidings should have a normal minimum radius of 150m with an exceptional minimum radius of 125m. All curves in the track design used to define the safeguarded area are in excess of 150m and are greater than the normal minimum radius.

The rail layout used to define the envelope of the safeguarded area in this masterplan was designed to meet the requirements of an SRFI identified in the summary document in Appendix A. The design is to normal Network Rail requirements and therefore no compromises have to be made in the operation of these sidings.

4 St Helens Local Plan

The St Helens Local Plan 2018 – 2033 (Appendix D) shows an area of the Parkside site safeguarded for use as an SRFI. It is understood that this area is defined by a rail layout designed by a third party. As this rail layout design is not available to review it is not possible to fully appraise all technical aspects of the layout and what it provides, however assumptions can be made from which some conclusions can be drawn.

The eastern leg of the sidings shown in the local plan connects to the Manchester to Liverpool mainline curving to run parallel to the West Coast Mainline. At the crossing of the Newton Park Farm access road it then enters a shallow curve into site. At the limit of this curve the land-take fans out over a large area of the site. It is unclear what this fan is required for but it may be an allowance for earthworks or a vehicle turning area, greater than had been allowed for in the Parkside Regeneration LLP safeguarded area.

The layout appears to provide around 800m of track between switches. This means it is possible to accommodate a 775m long train arriving directly to the sidings from the north and east. The curve on the track seems to be long and shallow so is likely above the 150m normal minimum radius permitted in the Track Design Handbook, although the design reasoning is unknown.

Without seeing the full design information it is not possible to fully appraise the layout however it seems that there is sufficient land-take specified to accommodate visual and acoustic bunding to shield the houses adjacent to the West Coast Mainline from the rail operations.

Although it is not possible to say for certain without seeing further information it is highly likely that the land provision shown in the St Helens local plan would provide sufficient space for an SRFI to be developed on the Parkside site.

5 Conclusion

Both the Parkside Regeneration LLP masterplan and the St Helens Local Plan 2018-2033 provide suitable space allocation for a siding of sufficient length to support the development of an SRFI on the East Parkside site.

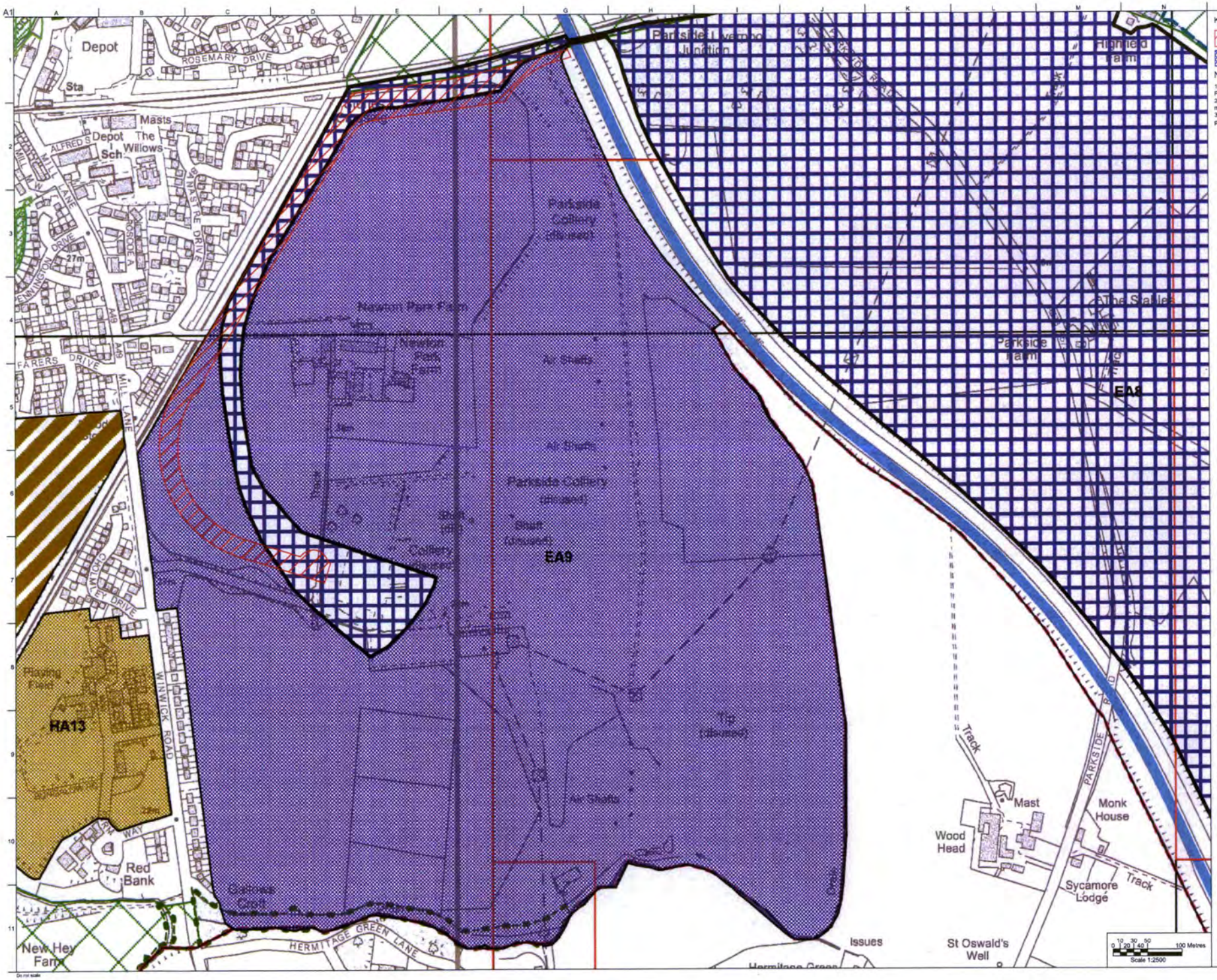
As the layouts for the rail sidings used to inform the land safeguarding on both plans have been designed by different parties, likely with different assumptions and design decisions, the solutions are naturally different. That being said both designs provide layouts that meet the requirements for an SRFI as listed in the summary table in Appendix A and are designed to meet the normal minimum requirements of rail sidings as set out in the Track Design Handbook.

From this review it is considered that the land safeguarded for sidings in the Parkside Regeneration LLP masterplan is not prejudicial to the delivery of an SRFI on the East Parkside site. Additionally no compromise on the operation of the SRFI needs to be made with the delivery of these layouts.

File Note

237135-00 15 June 2017

Appendix C



Key

PRLLP safeguarded area

St Helens Local Plan safeguarded area

Notes

1. Drawing produced in support of technical note FPC-ARP-XX-XX-FN-RX-00001
2. Parkside Regeneration LLP (PRLLP) proposed masterplan 31.10.16 used to show safeguarded area
3. St Helens Council local plan preferred options draft policies map - page 17 of 25 shown

Issue	Date	By	Chkd	Appd
P1	15/06/17	DB	JL	MW

For Information

ARUP

12th Floor The Plaza
100 Old Hall Street Liverpool L3 9QJ
Tel+44(0)151 227 6367 Fax+44(0)151 227 6299

Client
Parkside Regeneration LLP

Job Title
Former Parkside Colliery

Indicative land-take for safeguarding comparison

Scale at A1 1:2500

Discipline Civils

Job No 237135-00

Drawing Status Information

Drawing No FPC-ARP-ZZ-ZZ-SK-RX-00001

Issue P1

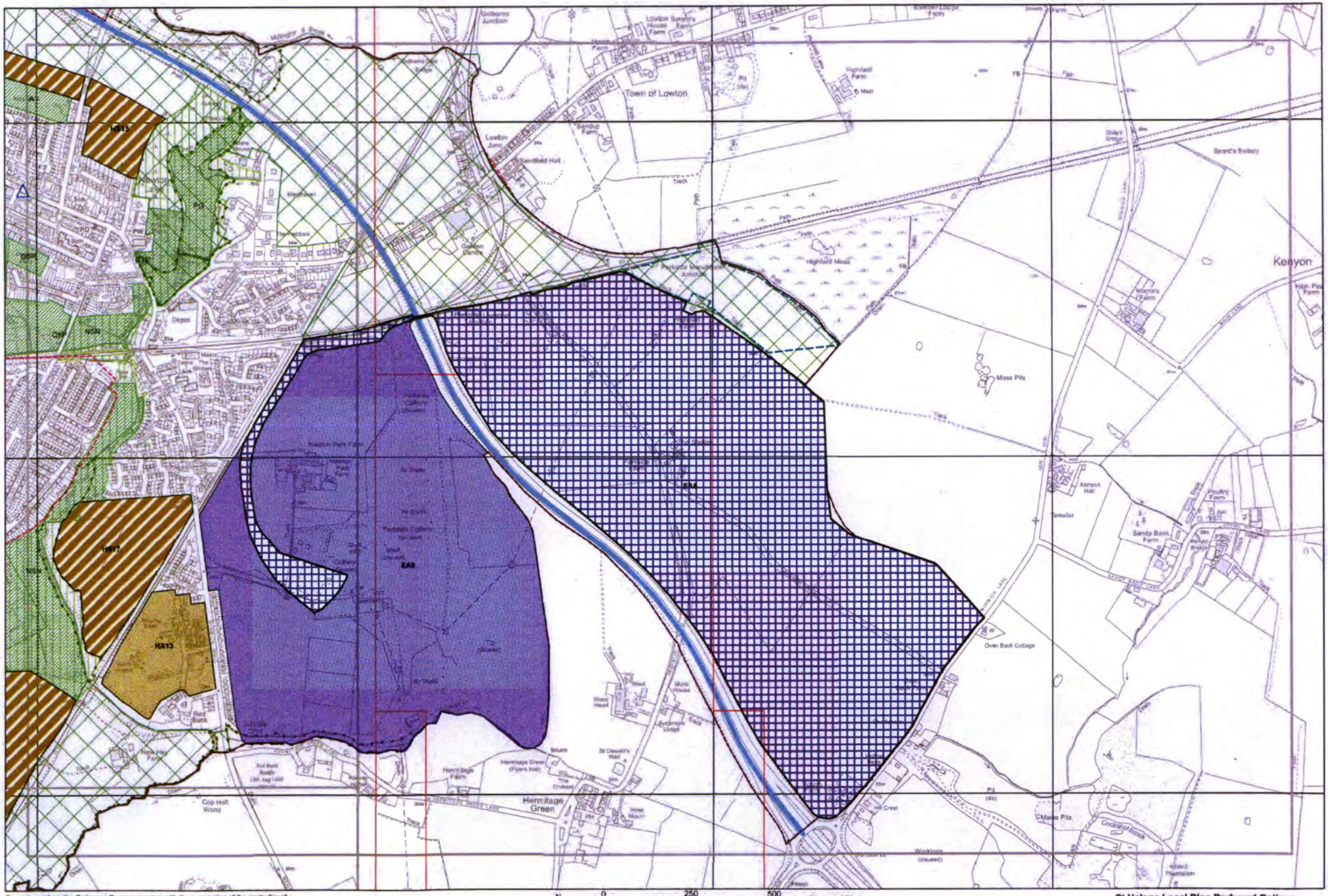
Do not scale

© Arup

File Note

237135-00 15 June 2017

Appendix D



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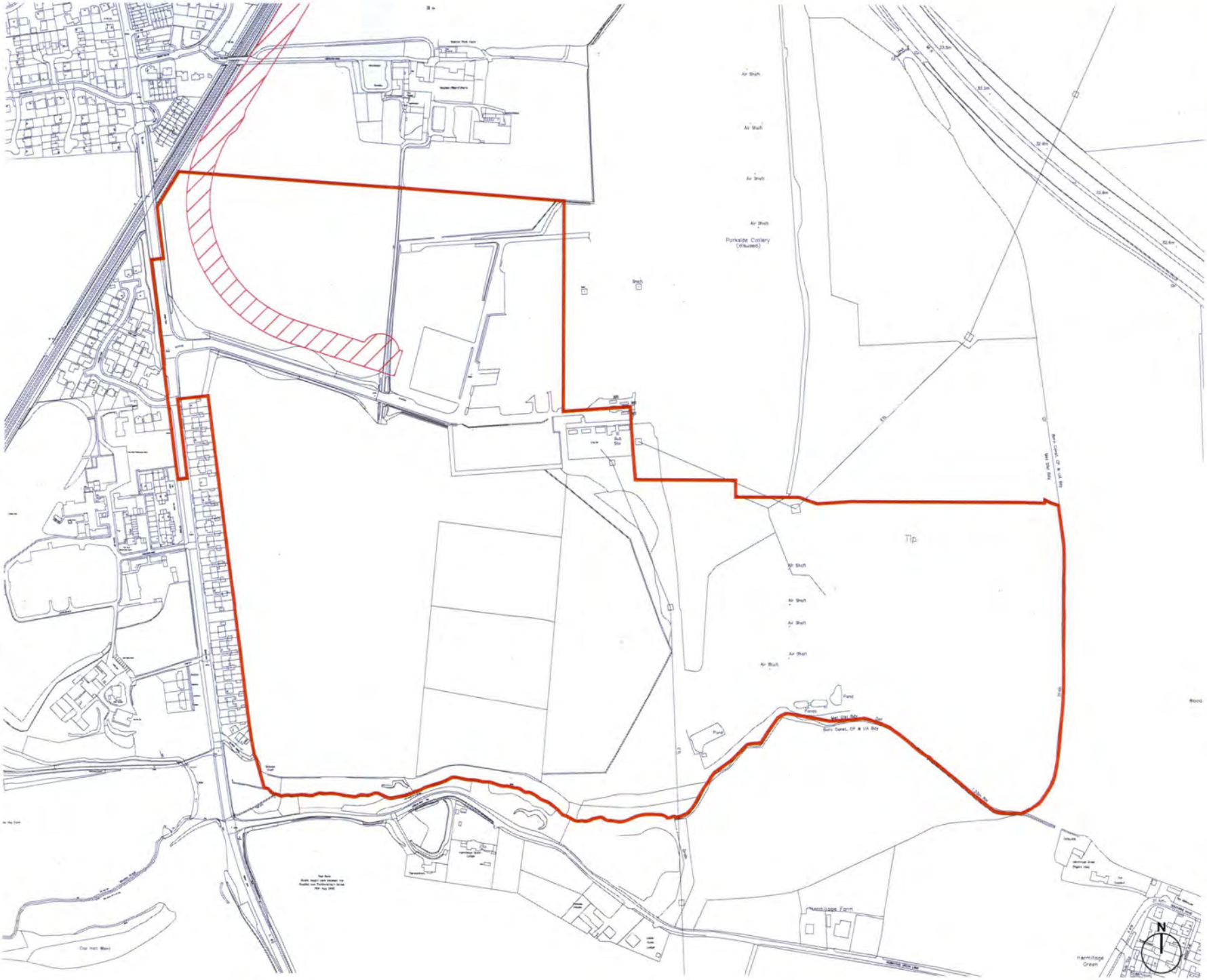
St Helens Local Plan Preferred Options
Draft Policies Map - Page 17 of 25



General Notes

All site dimensions shall be verified by the Contractor on site prior to commencing any works.

Do not scale from this drawing.

Only work to written dimensions.

This drawing is the property of Fletcher-Rae (UK) Limited (t/a Fletcher-Rae) and copyright is reserved by them. The drawing is not to be copied or disclosed by or to any unauthorised persons without the prior written consent of Fletcher-Rae (UK) Limited.

Phase 1 Site Boundary
Area: 118.37 Acres / 47.90Ha

Future rail land safeguarding

Revision

Scale	1:2000@A1
Status	PLANNING
Drawn by	AL
Date	26.06.17

Client
Parkside Regeneration LLP

Project
Parkside Colliery

Drawing Description
Phase 1 Parameter Plan
Safeguarded Rail

Drawing No. 16043_PL111 Rev. /

fletcher | rae
Hill Quays, 5 Jordan Street, Manchester, M15 4PY
t ■ +44 (0)161 242 1140
f ■ +44 (0)161 242 1141
w ■ www.fletcher-rae.com
e ■ info@fletcher-rae.com

PO3749

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]

Sing

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

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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

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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

Appendix S
Site 8EA

LPSD 8EA – Parkside West

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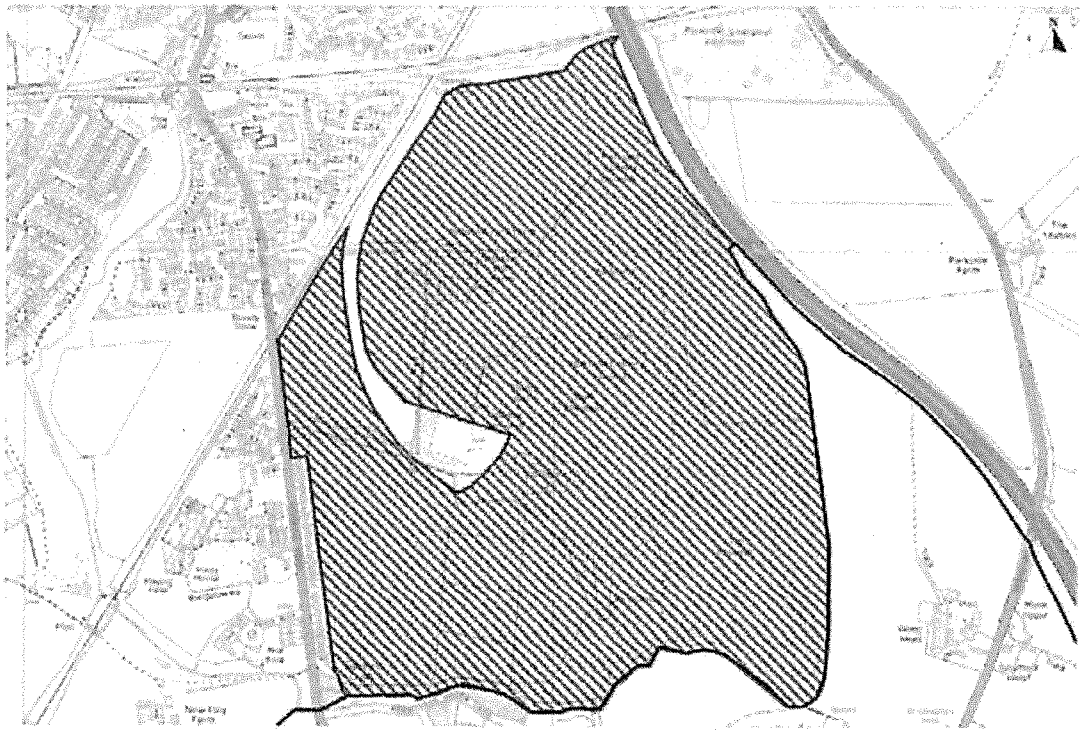
LPSD Ref:	8EA - Parkside West, Newton-le-Willows	Ward:	Newton
Notional Capacity:	79.57ha	Designation:	Allocate



Requirements:

- Access to an initial phase of development can be provided off the A49 (Winwick Road).
- Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).
- The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.
- Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the

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surrounding area.

- Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.
- The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.

25

Requirements:

- Access to an initial phase of development can be provided off the A49 (Winwick Road).
- Later phases of development should be served by a new link road from the east (linking to junction 22 of the M6).
- The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by relevant highway authorities.
- Any adverse impacts on the M6 (Junction 22) or other parts of the highway network must be suitably mitigated.
- Suitable measures must be included to control impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area.
- Proposals must include measures to mitigate any adverse impacts on the Battle of Winwick Registered Battlefield and other heritage assets in the area.
- The development must avoid prejudicing the future development of siding facilities (to serve future development within Parkside East - site 7EA) within the area indicated for this purpose shown on the Policies Map.

Comments
(highlighted text above to emphasise the following reasoning)

25

The final bullet point "the future development of siding facilities". This use of the word facilities is plural meaning more than one in relation to the sidings (or rail siding). The intention for the safeguarded land as shown on 8EA is so that tracks of rail can be laid in order for 450m to 750m length trains can leave the Chat Moss railway line quickly then reverse onto the Parkside east site (and the reverse) and that is the only requirement. This should have been expressed as "the future development of siding facility" (in the singular). But to have the phrase as part of LPSD 8EA as future development of siding facilities goes further than just the rail siding as it expresses additional facility to the rail siding. This gives in this policy the "room" for expansion of the Rail facilities that could be gantry loading and unloading of freight containers on the Parkside west side. This smaller sentence opens up the use of the A49 as a major route for all HGV freight to enter and use the Parkside west site, instead of using the Parkside east SRFI. So in effect the Rail siding or rail spur will become a rail freight terminal with in metres of where the local people live with not screening or protection from 24/7/365 working from rail gantry lights and noise from the loading unloading process. Then as each rail wagon is loaded or unloaded then shunted to the Parkside east side for adding to the appropriate train. This sentence needs to be

25

25 removed or changed to prevent other facilities only the track facility (singular). But the Local People do not see LPSD8EA as a feasible platform to shape their surroundings the Local People see Policy LOCAL 10LP as their preferred policy. 25

Justification for removing Site7EA from the Green Belt

4.36.14 Site 7EA was (until adoption of this Plan) located in the Green Belt. However, its development in accordance with Policy LPA10 (linked to the unique locational benefits set out above) would strongly support the Government's aims of building a robust northern economy, promoting the use of the national rail infrastructure, and reducing carbon emissions and congestion by limiting freight movement by road. The potential to develop an SRFI at this site is reflected in the TfN Northern Freight and Logistics Report Technical Appendices (2016) and would play a key role in delivering the objectives of the Liverpool City Region Growth Plan and Strategic Economic Plan (2016).

4.36.15 In combination with Parkside West (Site 8EA), the Parkside East site provides the single largest economic development opportunity in the Borough. The parts of the site that are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.

4.36.16 Taking into account the above factors, the land identified in Figure 4.4 has been removed from the Green Belt. Out of a total of 124.55ha of land at Parkside East it is estimated that 64.55ha will contribute to the Borough's needs for employment development with the remaining 60ha being required to provide related rail and road infrastructure and landscaping. A further 5.58ha of land to the west of the M6 is safeguarded to facilitate rail access to/from the north to the Parkside East site. 24

24

PO3750

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]

EL0192A.2.pdf

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:	[redacted]	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.

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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 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 REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

4.0 SITE ALLOCATION 8HA

4.1 Our Client welcomes and supports the inclusion of Site 8HA, Land South of Higher Lane and East of Rookery Lane, as a housing allocation in the New Local Plan. This Site forms part of our Client's land interests, referred to as "Site A". The Plan identifies that the Site will deliver 259 dwellings before 2035 i.e. within the Plan period. The Council clearly recognise that the Site is suitable, available and deliverable within this timeframe, something which our Client agrees with and is supportive of. 07

4.2 Our Client considers that the indicative capacity of the Site should be treated and expressed as a minimum figure to provide a degree of flexibility in the event that it is possible to accommodate more dwellings on the Site following a detailed masterplanning exercise and having regard to other policy requirements in the Plan (i.e. density, open space).

4.3 The allocation of Site 8HA is accompanied by a Site Profile, located within Appendix 5 of the New Local Plan. The Site Profile identifies the location of the Site, as well as detailing certain development requirements. These requirements are summarised below:

- Safe highway access into the Site from Rookery Lane and Higher Lane (with any necessary off-site improvements);
- Appropriate noise attenuation measures;
- Flood attenuation and habitat creation; 08
- Consideration of protected trees; and
- The provision of a range of house types in accordance with policies LPC01 and LPC02.

4.4 Whilst our Client does not object to these requirements, they do consider that further detail should be provided in order to provide certainty going forward. For example, which trees should seek to be retained, and what noise attenuation measures would be expected/acceptable? Our Client is willing to work with the Council to agree such requirements.

4.5 At present, the entire Site is designated as Green Belt; in allocating the Site for housing in the New Local Plan, the Council is proposing to release the Site from the Green Belt.

4.6 Accordingly, as part of the New Local Plan evidence base, the Council has undertaken a review of the Green Belt across the Borough. The Green Belt Review includes an

PO3751

EL0084

St Helen's Local Plan Submission Draft - Rep on behalf of English Land (submitted 12.3.19)
Andy Frost
to:
planningpolicy@sthelens.gov.uk, [redacted]
12/03/2019 12:06

[redacted]

3 Attachments

English Land Representations to the St Helen's Local Plan Submission Draft (January 2019).pdf Appendix 2.pdf

Appendix 3.pdf

Dear Sir/Madam

We have completed and submitted the representation form online.

To support our Representation please also see our attached report which is cross-referenced on the form.

Please note I have previously issued Appendix 1 (referred to in the Reps attached) which was our client's Reps to the 2017 consultation. To avoid confusion and duplication I am not re-sending unless you request.

Appendices 2 and 3 are attached.

Please confirm due receipt.

Regards

Andy Frost | Frost Planning Ltd
[redacted]
Frost Planning, Drumlins, 57 Chelford Road, Prestbury, Cheshire SK10 4PT

A refreshing force in Planning Consultancy

FROST PLANNING

Frost Planning Limited is a limited company registered in England and Wales. Registration number: 7877771. Registered office: Drumlins, 57 Chelford Road, Prestbury, Cheshire, SK10 4PT

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9EA
1 - Appendix 5
2 - LPA04
3 - EVA
4 - Table 4.1
5 - SA

Representor Details

Web Reference Number	WF0189
Type of Submission	Web submission
Full Name	Mr G Taylor
Organisation	English Land Ltd
Address	* See Agent * See Agent
Agent Details	Mr Andy Frost Frost Planning Ltd Drumlins 57 Chelford Road Prestbury Cheshire, SK10 4PT

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/Site Allocation 9EA (and cross-referenced in Table 4.1 plus Appendix 5)
Paragraph / diagram / table	As above
Policies Map	Pages 5 and 6
Sustainability Appraisal / Strategic Environmental Assessment	Chapter 4.2.13
Habitats Regulation Assessment	n/a
Other documents	Employment Needs Study and Economic Viability Assessment

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
Refer to the submitted Representation report as attached/separately forwarded.

7. Please set out modification(s) you consider are necessary
Refer to the submitted Representation report as attached/separately forwarded.

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

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

To ensure the proposed amendments are fully understood and taken into account.

Response Date	3/12/2019 11:46:09 AM

FROST™ PLANNING

Land to the west of Sandwash Close, Rainford

St Helen's Local Plan 2020-2035 Submission Draft (January 2019)

Representation

On behalf of English Land Ltd

Prepared in accordance with
The Town and Country Planning Act 1990

March 2019

1 Introduction

1.1 Background

Frost Planning Ltd represents English Land Ltd in respect of their land ('the site') to the west of Sandwash Close, Rainford.

The site is currently allocated for B1/B2/B8 employment development in the St Helen's Unitary Development Plan (UDP), published in 1998. However, St Helen's Council ('the Council') is preparing a new Local Plan and once adopted the current UDP allocation will be replaced. It will also replace all of the policies contained in the St Helen's Local Plan Core Strategy 2012. The new Local Plan will be used in assessing planning applications.

The Local Plan 'Preferred Options' document was consulted in 2016/17. The site was allocated under site reference Allocation 'EA10 - Land to the West of Sandwash Close, Rainford' for 6.96 hectares for B2 and B8 development. Frost Planning made representations to support the allocation for B1/B2/B8 purposes and allow access from both Sandwash Close and Pasture Lane.

The Local Plan 'Submission Draft' is now being consulted between 17th January to 13th March 2019. Following this period, the Submission Draft will be submitted, together with the representations received, to the Secretary of State for Examination in Public of the Local Plan by an independent Planning Inspector. The Council hope to adopt the local Plan in 2020 and it will cover the period up to 2035. The Submission Draft is the version that the Council wishes to adopt.

In the Submission Draft the site is now re-allocated under site reference '9EA - Land to the west of Sandwash Close Rainford' for 6.96 hectares for B2 and B8 development. We note the latest draft allocation omits 'Class B1' uses and fails to allow for access to Pasture Lane.

1.2 Purpose

The purpose of this Representation is to make comments on the Submission Draft (and evidence base). More particularly, to secure Class B1 uses and access to Pasture Lane. We have also considered other deficiencies and inaccuracies in the consultation documents.

This Representation should be read in conjunction with Appendix 1 (previously forwarded). This comprises our previous submission to the Preferred Options Local Plan (including Appendices) in 2017.

This Representation also relates to the latest National Planning Policy Framework ('NPPF') which sets out the 'soundness' to be applied to the emerging Local Plan (and by definition also applies to the site itself).

1.3 About the Author

This Submission has been prepared by Frost Planning Limited - an independent planning consultancy, based in Cheshire. The Managing Director and author of this Representation is Andy Frost. Andy is a Chartered Member of the Royal Town Planning Institute (RTPI) and has over 27 years' experience in both local authority and private sector planning practice.

1.4 Scope and Structure

The scope and structure of this statement is as follows:

3 Review of Draft Policy Context

3.1 Background

The purpose of this Representation is to review the Submission Draft and evidence base which is currently on consultation. The Submission Draft (January 2019) sets out the framework for the growth and development of the Borough. It identifies how and where new development and regeneration should take place and thereby promotes and manages the future development of the Borough. It includes: the vision and objectives for the development of the Borough up to and beyond 2035; strategic policies guiding the amount, form and location of 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 applications for new development, and details of where these will apply. The evidence base informs the Submission Draft (including the draft site allocations). They include: The Local Plan Preferred Options Report of Consultation (December 2018), the Employment Land Needs Study (January 2019), the Sustainability Appraisal (January 2019), and the Economic Viability Assessment (December 2018)

The Submission Draft (and evidence base) is therefore very relevant to the site.

3.2 Draft Strategic Policies

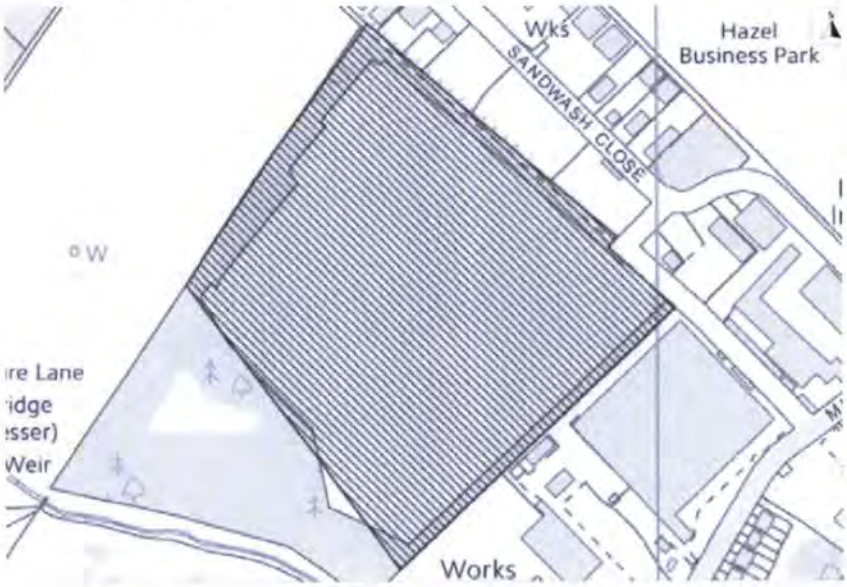
The policies in the Submission Draft which are most relevant to the site are:

- Policy LPA02: Spatial Strategy
- Policy LPA04: A Strong and Sustainable Economy
- Policy LPA04: Strategic Aims, Objectives and key Delivery Mechanism

3.3 Draft Site Allocation

The site allocation is identified in Table 4.1 and on the Policies Map under reference '9EA' under the site name: 'Land to the West of Sandwash Close, Rainford'. It is also reproduced in Appendix 5 of the Submission Draft and copied in Image 5 below. The site is identified as 6.96 hectares for employment (Classes B2 and B8) uses. Notably, the draft site allocation does not permit Class B1 purposes. It does not show direct access to Sandwash Close. It does show or infer access to Pasture Lane would be acceptable.

Image 5: Draft Site Allocation – Site Reference: 9EA



5 Proposed Amendments

5.1 Context

Although we support the site's allocation for employment use in principle, there is a compelling case to improve the clarity/consistency of the site allocation, and enhance the highway and viability provisions of the site allocation. In reviewing the Submission Draft and the evidence base supporting it, there appears to be significant deficiencies and inconsistencies which should be addressed by the Council in advance of formally submitting the draft Local Plan for consideration by the inspector. This is especially in the context of the NPPF which requires Local Plans must satisfy the 'soundness' tests, i.e. (i) positively prepared; ii) justified; iii) effective; and iv) consistent with national policy.

The table below highlights the key deficiencies and inconsistencies, the reasons, and the proposed amendments. These amendments will improve clarity/consistency and enhance the highway and viability provisions. The amendment will ultimately make the Local Plan 'sound' in line with the NPPF.

5.2 Proposed Amendments

Deficiencies & Inconsistencies	Reasons	Proposed Amendments
Submission Draft - Draft Policies Map, Inset Allocation (Appendix 5) and Table 4.1 (site reference: 9EA)	The site access to Sandwash Close is not explicitly shown on the Draft Policies Map or in Appendix 5 and is therefore unclear. The additional site access from Pasture Lane is not explicitly shown on the Draft Policies Map or in Appendix 5. This is inconsistent with highway considerations and the previous grant of planning permission in 2012. Access to Pasture Lane (in addition to Sandwash Close) will clearly benefit local traffic conditions and improve the viability of the site. Such infrastructure/engineering works are also exempt in Green Belt policy terms (see NPPF, para 146). The access from Pasture Lane was approved in 2012 (P/2012/0043). The site allocation should also take into account the industrial agency advice from Jones Lang LaSalle and Sanderson Weatherall (see Appendices 2 and 3).	Extend the site allocation to form accesses from Sandwash Close and Pasture Lane. More specifically: • The site access from Sandwash Close should be shown in the Policies Map and Appendix 5. For flexibility the site allocation should extend along the frontage to Sandwash Close to reflect the red edge boundary line associated with the extant planning permission (1291/017) (see Image 2 in this statement). This is also consistent with the red line boundary of our client's ownership and thus do not require to involve any third party to create unfettered access to the land from the public highway. Also include a footnote below Table 4.1 to express the same. • The site access from Pasture Lane should be shown in the Policies Map and Appendix 5. It should broadly reflect the approved site plan associated with planning permission P/2012/0043 (see Image 3 in this statement). Also include a footnote below Table 4.1 to express the same.

20th April 2018

[redacted]

Proposed Development Land off Sandwash Close, St Helens.

Further to our recent discussion we write to confirm our thoughts on the potential commercial development of the plot of land currently accessed from Sandwash Close, St Helens.

The subject site is capable of accommodating an industrial/warehousing scheme totalling 340,000 sq ft, built to an institutionally recognised standard and specification. We understand discussions are ongoing with the Local Authority to progress planning permission.

The proposed new development will appeal to both local, regional and national occupiers as it is situated in a well-established location between Liverpool and Manchester with proximity to the A580 East Lancashire Road and the wider North West motorway network offering a readily supply of labour on its doorstep which is a key factor in occupiers deciding where to locate their new facilities or expansion of existing operations.

The development is likely to attract interest in a variety of unit sizes when there is currently a lack of available stock across all sizes ranges in the immediate area and the wider market. We have witnessed the success of other neighbouring well located and connected schemes such as Mere Grange, St Helens and Boston Park, Haydock (approx. 300,000 sq ft in multiple units).

In considering the development of the subject site the current access from Mill Lane and Sandwash Close is somewhat constrained. For greater certainty in order to attract new occupiers to enable the successful development of the site and mirror the successes elsewhere in the area we are of the opinion that the site requires improved access to the A570 via a new access road from Pasture Lane. Otherwise if the existing access is to be utilised this is likely to put off potential occupiers and be restrictive in attracting occupiers to the site along with potentially limiting the size and scale of the development which could mean the development becomes financially unviable.

Yours sincerely

[redacted]

[redacted]

Your ref

Our Ref

23 April 2018

[redacted]

Development Site - Sandwash Close, Rainford, St Helens, WA11 8LS

The above-mentioned site is situated off Sandwash Close on the Rainford Industrial Estate which is close to St Helens, Merseyside. It is located approximately 0.5 miles from the A570 Rainford Bypass and 1.5 miles from the A580 East Lancashire Road which provides access to Junction 23 of the M6 motorway, 7 miles to the east and Junction 5 of the M57 Motorway 7 miles to the west.

The subject site is in an excellent location for development and expansion of existing Sandwash Close Industrial Estate. There are a number of local and regional occupiers who identify the Rainford area as a location they would be willing to move to being situated close to the A570 and A580 link roads to the M6. Haydock Park and, more recently, Goldborne Industrial Estate have been increasingly successful in utilising these links and proximity to the M6.

Target Market – Occupational Demand

There is ongoing demand from Big Box B8 Storage and Distribution operators. The Manufacturing sectors and automotive industries are also on the rise especially in the North-West, and there is continued growth of internet and courier based operations.

We provide examples below of likely occupiers who we think will be interested in the site:-

- National and regional logistics / distribution companies (B8)
- Local and regional B1 occupiers
- Local and regional B2 occupiers
- Major and national regional manufacturers

We provide a number of active or recent agent-led requirements with target location including the area surrounding Rainford, St Helens:-

- **3PI Real Estate** – May 18. Requirement for 100k - 130k sq ft distribution warehouse. M6 up to Preston.
- **Nolan Redshaw** – April 18. 35k – 40k sq ft. Leasehold industrial requirement.
- **P3 Property** – April 18. 15k – 25k sq ft. Leasehold industrial requirement.
- **CBRE** – March 18. 30k – 80k sq ft. Leasehold industrial requirement. Immediate occupation.
- **Johnson Fellows** – March 18. 7,000 sq ft. Leasehold industrial requirement. Immediate occupation.
- **Carter Jonas** – December 17. Manchester to Cumbria. Existing units only. 8k – 100k sq ft.
- **M1 Agency** - September 17. 3 acres within a 5 mile radius of Haydock. For vehicle storage and preparation. B2 & B8 use.
- **Halls Commercial** – March 17. St Helens specific. 40k - 65 sq ft. Leasehold or Freehold.

You will note from the requirements outlined above that there is a good level of occupier demand which would potentially be suitable for the subject site.

We would comment however, that the current access from Mill lane onto Sandwash Close deters many occupiers and this together with the quality of the industrial stock has led to stagnation in the development of the estate. If the proposed access road directly from the A570 is implemented then this would significantly improve the marketability of the site and would attract better quality occupiers.

Should you have any queries or require clarification then please do not hesitate to contact me.

Yours sincerely

[redacted]

PO3752

Fw: Warrington Response to St Helens Local Plan NTLS

[redacted] 20/01/2020 10:55

[redacted]
Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

A: Town Hall Annexe, Victoria Square, St. Helens, WA10 1HP
T: [redacted]
E: [redacted]
W: www.sthelens.gov.uk/localplan

----- Forwarded by [redacted] on 20/01/2020 10:54 -----

From: [redacted]
To: [redacted]
Cc: [redacted]
Date: 16/04/2019 11:41
Subject: Fw: Warrington Response to St Helens Local Plan NTLS

[redacted]

I attach Warrington's comments.

They had sent them previously but only to [redacted] and my in box and it was not clear at that stage if they were the final comments.

I have confirmed to them that we will log their letter as a formal response.

Best Regards,

[redacted]
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

[redacted]
----- Forwarded by [redacted] on 16/04/2019 11:38 -----

From: "Bell, Michael" [redacted]
To: [redacted]
Date: 16/04/2019 11:25
Subject: FW: Warrington Response to St Helens Local Plan NTLS

[redacted]

I understand you wanted me to send our comments again.

Michael

From: Bell, Michael
Sent: 13 March 2019 11:37
To: [redacted]
Subject: Warrington Response to St Helens Local Plan NTLS

[redacted]

I have attached our response in the form of a letter. It identifies the site allocations we are providing comments on and includes some suggested wording to ensure the plan is sound.

In order to get lead Member sign off I have had to prepare a letter rather than use your on-line form.

Can you confirm this is an acceptable format for our response.

regards

Michael Bell

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH

[redacted]

****
*****

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- Warrington Response to St Helens Local Plan Draft Submission Version.pdf

EL0298

① - LPA04 ④ - LPA06
② - LPA05 ⑤ - APPENDIX 5
③ - DEC ⑥ - APPENDIX 7
⑦ - LPA10
⑧ - LPA04 - 8EA

[redacted]
St Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

WARRINGTON
Borough Council
Andy Farrall
Executive Director
Economic Regeneration, Growth and Environment

Town Hall
Sankey Street
Warrington
WA1 1UH

13 March 2019

Dear [redacted]

RE: St. Helens Local Plan 2020-2035 Submission Draft

Scale of housing and employment growth

Warrington is supportive of St. Helens' overall growth ambitions and its commitment to meet its own housing and employment needs. ① & ②

Warrington and St Helens, together with Halton, form the mid-Mersey Housing Market Area. All three Councils have worked closely around housing need and supply issues as part of our respective 'duty to cooperate' obligations. ③

Site 1EA - Omega South Western Extension

Warrington agrees that the site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington, although it will continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does. ①

As stated in Warrington Borough Council's response to the Preferred Development Option consultation, Warrington does therefore agree to Site 1EA1: Omega South Western Extension forming part of Warrington Borough Council's employment land supply. This will be confirmed in the forthcoming Proposed Submission Version of the Warrington Local Plan.

It is noted that the intention is for the extension to use the existing access arrangements for the wider Omega site. It should also be noted that working closely with Omega Warrington Limited, the Council has developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega as a strategic employment and housing location. This work has highlighted that both the local and strategic road ①

network will be placed under considerable pressure when the current extent of the Omega site is fully developed.

Therefore it would be for any future planning application for this extension to Omega to demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8. Any highway mitigation measures shown necessary would require appropriate contributions payable towards either the Council's programme of transport improvements and / or to Highways England.

If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.

1

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- *a future planning application for this extension to Omega must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.*
- *If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads*

1 & 5

SUGGESTED MODS

<u>Site 1ES - Omega North Western Extension</u>

Warrington does not believe that this scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62 will be required.

The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington and the Council therefore does not consider that this future extension could contribute to Warrington's future employment land supply.

4

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

7

- *Any development of this site will require major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England.*

SUGGESTED MOD

& 6

PO3753

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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EL0200A-2.pdf

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.

This requirement is vague and it is unclear what is meant by expanded or enhanced infrastructure. It should therefore be removed given the policy and plan as a whole addresses infrastructure requirements adequately. 24

4.30. LPA05.1(3) require development proposals which only cover part of a Strategic House Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site. 25

4.31. Murphy Group are strongly promoting their land at Leyland Green Farm (site ref. 1HS) for residential development of up to 291 dwellings within the plan period. Therefore, Murphy Group are seeking that their safeguarded land for housing allocation is upgraded to a housing allocation, which can be delivered in the immediate term. The site is in one ownership and therefore does not suffer from the constraints or potential issues associated with land in multiple ownerships and potential delays in delivery as a result. The site is otherwise unconstrained (apart from existing Core Strategy Green Belt status). The St Helens land at Leyland Green Farm, combined with the Wigan land at Leyland Green Farm (indicative capacity of 210 dwellings), could deliver circa 501 dwellings in total. 26

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

Policy LPA06: Safeguarded Land

4.33. Despite Murphy Group's desire for the Leyland Green Farm site (ie land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood) (site ref. 1HS) to be upgraded from safeguarded land for housing to a housing allocation, in the event that this does not occur, we strongly support the removal of the Leyland Green Farm site from the Green Belt and its allocation as safeguarded land for housing, as per Policy LPA06.1. 27

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

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

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

4.37. Appendix 7 of the local plan provides requirements for the site. We support the identification of site access via Leyland Green Road and Billinge Road. Murphy Group have instructed Vectos to undertake initial highways work and assess suitable site access locations. The initial transport work is contained within the supporting Delivery Statement submitted alongside this representation. Murphy Group are aware that the site will require a pedestrian and cycleway connections across the site and to connect the site to the wider area. 28

4.38. Murphy Group acknowledge that the ground conditions are not known at this stage as no ground investigation work has commenced. This would be commissioned prior to the planning application stage. However, the site is in arable use and ground conditions are expected to be similar to the land to the south that has been allocated for new residential development.

4.39. Policy LPA06.2 highlights that planning permission for development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment of safeguarded sites in the plan period will be refused. We request further clarity on when a full review of the will be triggered. 29

4.40. We object to this on the basis that if housing allocations are not coming forward in the timescales referred to in the local plan (at Table.45 'Sites allocated for new housing development' (either before 31.05.35 and after 31.05.35)), or development is stalled, safeguarded housing sites should be brought forward for development within the plan period. Waiting for the plan to be reviewed could be a lengthy delay during which the housing crisis is exacerbated further. It is therefore not appropriate to include a policy in the local plan which authorises the point-blank refusal of planning application on safeguarded housing land within the plan period. Such applications should be assessed at that time (which would inevitably be later in the plan period), on a case by case basis, and considering the wider context and planning balance (ie housing delivery/under delivery, five year housing land supply or lack of).

4.41. We support that safeguarded land should be developed before other Green Belt and greenfield sites. 30

Policy LPA07: Transport and Travel

4.42. We support that Policy LPA07.1.b. seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport. 31

4.43. Garswood offers a range of local services, facilities and public transport connections and is well positioned to accommodate growth. The St Helens Core Strategy confirms that improvements have been made to Garswood train station, offering journeys to both Wigan and Liverpool, whilst the town has good road linkages to areas across Merseyside.

4.44. Within Garswood and in context of the Leyland Green Farm site, there are a number of key amenities located within an appropriate walking distance of the site which would serve some of the day-to-day needs of future residents, including primary schools, healthcare facilities and local shops. The site is served by numerous bus routes however, which provide high frequency services to Ashton-in-Makerfield, therefore providing the potential for sustainable travel when undertaking general day-to-day activities.

4.45. The identification of a proposed housing allocation of land south of Billinge Road, East of Garswood Road and West of Smock Lane (site ref. 1HA), with an indicative capacity of 216 dwellings, demonstrates the settlement is a suitable and sustainable location, in transport terms, to accommodate development.

4.46. In the St Helens Emerging Local Plan Evidence Base Transport Impact Assessment, housing allocations are ranked in terms of their accessibility to local facilities. Whilst it does not refer directly to the Leyland Green Site, it assesses the land directly adjacent to the south of our site (ie land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood (site ref. HA2)). It is assessed as 'excellent' in terms of accessibility to the railway station by cycle, major food stores, primary schools and healthcare facilities. The Leyland Green Farm site (which adjoins the housing allocation to the north) shares similar accessibility ratings to the housing allocation and is therefore well connected to local services and facilities.

4.47. Policy LPA07(9) states that further details of the policy will be set out in a future review of the 32

PO3754

EL0209

SITE 8115

(1) - LPA06

(2) - APPENDIX 7

LPSD comments
Cllr D Baines
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:35

[redacted]

1 Attachment

LPSD comments - Cllr David Baines.pdf

Hello,

Please find attached my comments regarding the LPSD.

Best wishes,

David

Councillor David Baines
Ward Councillor for Windle, St Helens
[redacted]

Councillor David Baines, Ward Councillor for Windle
Local Plan Submission Draft

On behalf of residents I wish to make the following comments regarding the Local Plan Submission Draft (LPSD) site reference 8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.

Residents who live near the site proposed as safeguarded land have raised a series of concerns about this. Residents have expressed concerns about the methodology behind the housing demand target; the methodology behind the scoring system used for the Greenbelt Review and choosing sites; removal of the land from the green belt; impact on wildlife; the impact on residents' health and quality of life; and increased noise and air pollution. In addition, residents have the following specific concerns about this site:

1

- Impact on **traffic and roads**, particularly those areas already often heavily congested such as Windle Island and the East Lancashire Road, Bleak Hill Road, and Rainford Road;
- Impact on **local schools**, already fully or over-subscribed and being expanded to cope with the growth in pupil need already expected without the potential addition of 1000+ homes nearby;
- Impact on **health services**: there is no GP service or health centre in Windle ward at all. The nearest services are in Eccleston or the town centre. Residents report it can already be incredibly difficult to get appointments when needed. There is no health service within reasonable walking distance from current homes, let alone the proposed site;
- Lack of existing **amenities**: there are no convenience stores within easy walking distance of the proposed site with the exception of the Tesco Express at Windle Island, to which we do not want to be directing even more traffic, and a garage across the 4 lanes of traffic on the East Lancashire Road. Residents believe that neither location is convenient for this proposed site of 1000+ homes.

In its assessment of the site in LPSD Appendix 7: Site Profiles – Safeguarded Employment and Housing Sites, there is an acknowledgement of the concerns about the impact on highways, which I welcome, and several recommendations are made to mitigate the impact on existing roads. Residents have expressed scepticism that these recommendations would go far enough to alleviating any negative impact.

In a further recommendation, the assessment in Appendix 7 states: *"Financial contributions or the provision of on-site infrastructure for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage."*

2

Like the other recommendations regarding highways, this is welcome, but residents would like an additional statement that provision for on-site amenities such as convenience stores or even health provision may be required with any future development, for the benefit of both the new and existing local residents.

I support the LPSD but I understand the concerns raised by residents regarding site 8HS and on their behalf I would ask that in further stages of this process full consideration continues to be given regarding the impact on highways, schools, health services and amenities, and the work necessary to protect and improve these essential features of our community.

Councillor David Baines

PO3755

EL0084

St Helen's Local Plan Submission Draft - Rep on behalf of English Land (submitted 12.3.19)
Andy Frost
to:
planningpolicy@sthelens.gov.uk, [redacted]
12/03/2019 12:06

[redacted]

3 Attachments

English Land Representations to the St Helen's Local Plan Submission Draft (January 2019).pdf Appendix 2.pdf

Appendix 3.pdf

Dear Sir/Madam

We have completed and submitted the representation form online.

To support our Representation please also see our attached report which is cross-referenced on the form.

Please note I have previously issued Appendix 1 (referred to in the Reps attached) which was our client's Reps to the 2017 consultation. To avoid confusion and duplication I am not re-sending unless you request.

Appendices 2 and 3 are attached.

Please confirm due receipt.

Regards

Andy Frost | Frost Planning Ltd
[redacted]
Frost Planning, Drumlins, 57 Chelford Road, Prestbury, Cheshire SK10 4PT

A refreshing force in Planning Consultancy

FROST PLANNING

Frost Planning Limited is a limited company registered in England and Wales. Registration number: 7877771. Registered office: Drumlins, 57 Chelford Road, Prestbury, Cheshire, SK10 4PT

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9EA
1 - Appendix 5
2 - LPA04
3 - EVA
4 - Table 4.1
5 - SA

Representor Details

Web Reference Number	WF0189
Type of Submission	Web submission
Full Name	Mr G Taylor
Organisation	English Land Ltd
Address	* See Agent * See Agent
Agent Details	Mr Andy Frost Frost Planning Ltd Drumlins 57 Chelford Road Prestbury Cheshire, SK10 4PT

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/Site Allocation 9EA (and cross-referenced in Table 4.1 plus Appendix 5)
Paragraph / diagram / table	As above
Policies Map	Pages 5 and 6
Sustainability Appraisal / Strategic Environmental Assessment	Chapter 4.2.13
Habitats Regulation Assessment	n/a
Other documents	Employment Needs Study and Economic Viability Assessment

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
Refer to the submitted Representation report as attached/separately forwarded.

7. Please set out modification(s) you consider are necessary
Refer to the submitted Representation report as attached/separately forwarded.

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

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

To ensure the proposed amendments are fully understood and taken into account.

Response Date	3/12/2019 11:46:09 AM

FROST™ PLANNING

Land to the west of Sandwash Close, Rainford

St Helen's Local Plan 2020-2035 Submission Draft (January 2019)

Representation

On behalf of English Land Ltd

Prepared in accordance with
The Town and Country Planning Act 1990

March 2019

	foreseeable types of economic growth – inclusive of Class B1 uses. Policy LPA04 therefore identifies a range of locations, types and sizes of employment sites to meet the needs of specific sectors of the business community and to protect existing areas where employment continues to be the most appropriate use. This includes site allocation 9EA. To bring this more closely aligned with these strategic policies, the site allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane to improve viability and enhance traffic conditions (see chapter 5).	
Planning History	The site's planning history (i.e. extant planning permission in 1992 and lapsed permission in 2012) supports the site allocation for employment development in principle. For greater consistency the allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane (see chapter 5).	Neutral
Economic Impact & Viability	The site allocation for employment uses is supported in principle due to a range of key factors: • Co-location adjacent to the Rainford Industrial Estate. This includes a mix of B1/B2/B8 uses. • Supports large/medium/small business requirements (including existing local occupiers seeking to expand), including B1/B2/B8 uses. • Will accommodate a wide range of occupier-type requirements, especially if Class B1 uses are allowed. • Meets local needs to the north of the borough where there is otherwise little planned growth. • Keppie Massie reports that average industrial land values and headline rents have shown a steady increase over the past 4 years, with strong take-up of 'big shed' manufacturing, third party logistics and non-internet retail sectors. Yields for industrial accommodation have also improved in recent years (linked to improving local market conditions). This site is clearly well located and configured to accommodate demand for employment development over the plan period, especially if access to Pasture Lane is allowed. • According to industrial land agents, Jones Lang LaSalle and Sanderson Weatherall, this is an excellent location for new industrial floorspace given the easy access to the A570 and A580 link roads to the M6. However, both accept the site's deliverability will benefit from access via Pasture Lane. In January 2017 Sanderson Weatherall specifically commented "If the proposed access road from the A570 is implemented then this would significantly increase the level of demand to the site,	**Positive**

	enabling better quality occupiers..." They also cited examples of occupier-types who will be interested in the site as including: national and regional logistics/distribution companies (B8); local and regional B1/B2 occupiers; and major national manufacturers. • The site will significantly improve the supply of employment land in this area to meet demand. The existing industrial offer in Rainford is generally poor with some buildings over 100 years old. There has been some recent development aimed at SME type businesses of c.3,000-5,000 sq. ft. but this is the most significant new build that Rainford has seen for 15 to 20 years. This site will considerably enhance the potential level, choice and quality of industrial accommodation on offer within the Rainford Industrial Estate, especially if Class B1 uses and access to Pasture Lane are also permitted. For greater relevance and effectiveness, the site allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane (see chapter 5).	
Social Impact	The site allocation (and especially if inclusive of Class B1 uses and access to Pasture Lane) will provide: • Range of jobs, tackle unemployment, leading to improvements in wellbeing. • Good access from housing in Rainford and the wider area to support existing communities, including future new housing proposed on the edge of Rainford.	**Positive**
Air / Water Quality	No harm due to the following factors: • Scale and type of uses will not be significantly pollutant. • Employment types of development being targeted are unlikely to produce large amounts of waste water.	Neutral
Traffic	Likely volume of HGV movements will be acceptable given this is an existing industrial area with existing infrastructure. Conditions will be improved if access is permitted via Pasture Lane. The Pasture Lane access would alleviate traffic on Mill Lane and this would be a considerable planning benefit for residents and the industrial occupiers in the Rainford Industrial Estate.	Neutral/**Positive**
Landscape	The site is open but not especially sensitive in landscape terms. It is not subject to a designated landscape area. The landscape is surrounded on two sides by well-established industrial development. On remaining boundaries, it is contained by woodland. Therefore, employment development (warehousing, offices, etc.) will blend with the semi-industrial landscape and will be visually screened / well contained by buildings and trees. There will be no sense of erosion/encroachment in the open countryside.	Neutral

5 Proposed Amendments

5.1 Context

Although we support the site's allocation for employment use in principle, there is a compelling case to improve the clarity/consistency of the site allocation, and enhance the highway and viability provisions of the site allocation. In reviewing the Submission Draft and the evidence base supporting it, there appears to be significant deficiencies and inconsistencies which should be addressed by the Council in advance of formally submitting the draft Local Plan for consideration by the inspector. This is especially in the context of the NPPF which requires Local Plans must satisfy the 'soundness' tests, i.e. (i) positively prepared; ii) justified; iii) effective; and iv) consistent with national policy.

The table below highlights the key deficiencies and inconsistencies, the reasons, and the proposed amendments. These amendments will improve clarity/consistency and enhance the highway and viability provisions. The amendment will ultimately make the Local Plan 'sound' in line with the NPPF.

5.2 Proposed Amendments

Deficiencies & Inconsistencies	Reasons	Proposed Amendments
Submission Draft - Draft Policies Map, Inset Allocation (Appendix 5) and Table 4.1 (site reference: 9EA)	The site access to Sandwash Close is not explicitly shown on the Draft Policies Map or in Appendix 5 and is therefore unclear. The additional site access from Pasture Lane is not explicitly shown on the Draft Policies Map or in Appendix 5. This is inconsistent with highway considerations and the previous grant of planning permission in 2012. Access to Pasture Lane (in addition to Sandwash Close) will clearly benefit local traffic conditions and improve the viability of the site. Such infrastructure/engineering works are also exempt in Green Belt policy terms (see NPPF, para 146). The access from Pasture Lane was approved in 2012 (P/2012/0043). The site allocation should also take into account the industrial agency advice from Jones Lang LaSalle and Sanderson Weatherall (see Appendices 2 and 3).	Extend the site allocation to form accesses from Sandwash Close and Pasture Lane. More specifically: • The site access from Sandwash Close should be shown in the Policies Map and Appendix 5. For flexibility the site allocation should extend along the frontage to Sandwash Close to reflect the red edge boundary line associated with the extant planning permission (1291/017) (see Image 2 in this statement). This is also consistent with the red line boundary of our client's ownership and thus do not require to involve any third party to create unfettered access to the land from the public highway. Also include a footnote below Table 4.1 to express the same. • The site access from Pasture Lane should be shown in the Policies Map and Appendix 5. It should broadly reflect the approved site plan associated with planning permission P/2012/0043 (see Image 3 in this statement). Also include a footnote below Table 4.1 to express the same.

Submission Draft – Table 4.1 (site reference: 9EA – 'Appropriate Uses')	The site allocation restricts the land uses to only B2 and B8 uses. This is inconsistent with the extant planning permission which includes B1 uses, the current UDP allocation which includes B1 uses, and the grant of planning permission in 2012 which includes B1 uses. Class B1 uses includes offices, light industrial and R&D – all conducive and compatible in principle for an employment area and supported by the draft strategic policies (LPA02, LPA04).	Include Class B1 uses within the range of appropriate uses.
Submission Draft - Footnote 15 (page 31)	The site is not fully consistent with the fact our client's site also benefits from an extant planning permission (in addition to sites 2EA and 6EA). Notably, the evidence base (Sustainability Appraisal) expressly states that the site has the benefit of an extant planning permission and can be completed without the need to obtain planning permission.	Footnote 15 should include reference to the fact that site 9EA also has the benefit of an extant planning permission for B1/B2/B8 uses and can come forward in any event without the need to obtain planning permission.
Evidence Base - Economic Viability Assessment (Keppie Massie)	The purpose of the report is to consider the viability of the site allocations in the Local Plan but it does not specifically comment on site 9EA and the viability benefits of allowing access off Pasture Lane.	Inclusion or supplementary note from Keppie Massie to address the access option to Pasture Lane in the context of improving the viability of the site, taking into account the industrial agent comments received (see chapter 4).
Evidence Base – Sustainability Appraisal: SA Report and Technical Appendix A	Paragraph 4.2.13 fails to acknowledge site 9EA benefits an extant planning permission for B1/B2/B8 uses. ID104 E13 in the assessment table (page 37 in the SA Report) is inconsistent with the Technical Appendix A. Furthermore, there is no tangible evidence/risk to biodiversity, landscape sensitivity, or distance to prominent ridgeline. Also, the development of this site for employment uses will clearly support the local economy, reduce poverty and social exclusion and minimise the need to travel (in contrast with the table which suggests a 'neutral' impact only)	Amend the following: • Include reference about the extant planning permission in para 4.2.13. • Ensure the table and Appendix A are consistent. • Amend the table/Appendix A to identify biodiversity, landscape sensitivity and distance to prominent ridgeline impacts will be 'neutral/positive'. • Amend the table to say the impact on the local economy, poverty/social exclusion, and need to travel will be 'positive'.

PO3756

EL0211

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

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.

EL0211

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

GRASSCROFT

Comments on Keppie Massie Economic Viability Assessment of December 2018

St Helens Local Plan

March 2019

GRASSCROFT DEVELOPMENT SOLUTIONS

List of Abbreviations:

Taylor Wimpey UK Ltd (Taylor Wimpey)
Keppie Massie (KM)
Grasscroft Development Solutions (GDS)
St Helens Council (SHC)
Economic Viability Assessment (EVA)
Dwellings Per Hectare (DPH)
Community Infrastructure Levy (CIL)
Gross Internal Area (GIA)
Building Cost Information Service (BCIS)
Gross Development Value (GDV)
Benchmark Land Value (BLV)
Existing Use Value (EUV)
Strategic Market Housing Assessment (SHMA)
Registered Social Landlord (RSL)

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4.	Evidence, Analysis & Appraisal Assumptions	10
5.	Conclusions	25

Appendix 1: 27

BCIS Data Extract

1. Introduction.

This report has been produced by Grasscroft Development Solutions to comment on the consultation document produced by Keppie Massie (KM) on behalf of St Helens Council (SHC). The document is titled "ST HELENS LOCAL PLAN ECONOMIC VIABILITY ASSESSMENT" (EVA). The document has been produced to set out and to invite comments on the approach proposed for the assessment of viability when considering the proposed new Local Plan for the period 2020 to 2035.

Grasscroft Development Solutions (GDS) have been instructed by Taylor Wimpey UK Ltd (Taylor Wimpey) to comment on the proposed approach to the Study, the viability appraisal methodology and the assumptions proposed.

Keppie Massie have identified within Section 1 of the EVA the purpose of the report. They refer to the NPPF at paragraph 1.02 and specifically to the importance placed on ensuring polices do not undermine the delivery of the plan[1]. It is with this in mind that all viability assumptions that are ultimately adopted should be based on a cautious approach as the commonly accepted residual valuation approach is by its nature sensitive to even small changes in key assumptions. If a local plan is to be successful in avoiding the need for site specific viability assessments on all future development sites and/or not deterring sites from being brought forward completely, then it is critical that the assumptions adopted are realistic and do not test the limits of viability.

KM and SHC have invited comments on the EVA by Wednesday 13th March 2019. This note concentrates on providing a response to the main assumptions proposed within the EVA in so far as they relate to the residential development market only, it does not comment on commercial uses.

In preparing the note other documents have also been considered and referred to where appropriate including the Authority's Local Plan Strategy and associated documents, Viability Testing Local Plans and the RICS Guidance Note: Financial Viability in Planning.

[1] Reference ID: 10-002-20180724

2. Grasscroft Development Solutions.

This report has been undertaken by Michael Coulter, a Director and Richard Heathcote, a Consultant at Grasscroft Development Solutions.

Grasscroft Development Solutions is the development consultancy arm of the Grasscroft Property Company Ltd, which is a regional based residential and commercial development company.

The Grasscroft group of companies has been active within the North West, and wider area, for the past twelve years and has undertaken and completed a number of successful residential and commercial developments.

Michael Coulter has a First Class Honours Degree in Building, a Master's Degree in Built Environment Research and is a Member of the Chartered Institute of Building. He has 20 years experience at the highest level within the property industry and has held senior and board level positions at a variety of development and building companies.

Michael's career has had a strong residential focus and as such he has been responsible for the development and delivery of a wide variety of private sector and social housing schemes within the North of England. These schemes have ranged from small new build projects to large urban regeneration initiatives, including Macintosh Village in Manchester which incorporated the UK's first 'eco tower'. Posts held by him have included:

- Roland Bardsley Homes Ltd – Director
- Taylor Woodrow Capital Developments – Associate Director
- Morrison Homes Ltd – Area Development Manager

Richard Heathcote has a degree in Urban Land Economics and has 25 years of experience in the property industry having held senior positions with a number of development companies and commercial property practices.

Richard's career has also had a strong residential focus, both for new build traditional housing, high rise apartment development, mixed use developments and major listed building conversions throughout England and Wales. Posts held by him have included:

- GL Hearn - Land and Planning Director
- Crosby Lend Lease - Development Manager
- CALA Finance - Business Development Manager
- PJ Livesey Group - Land and Estates Manager

Current consultancy commissions range from providing advice on viability to full development management of residential and mixed use projects.

Taking into account the above demonstrable experience, the writers of this paper are in a very strong position to comment on the issues set out within the St Helens Local Plan Economic Viability Assessment consultation document.

3. General Methodology.

Within this section of the report we will consider and comment upon the general approach adopted by Keppie Massie to assessing viability in the SHC area and highlight some of the key areas of guidance, particularly where KM have adopted a different approach or where from the information provided to date there is a lack of clarity on the basis of inputs.

Evidence Base and Presentation of Viability Results.

There is currently a lack of detail on how a number of the KM appraisal inputs have been evidenced and calculated, particularly in regard to critical assumptions such as build cost. It is clear however that this is currently set at too low a level overall, which we will refer to further below.

At present the EVA does not include copies of the viability appraisal summaries. For consultees to be able to assess fully the KM assumptions and the results tables that have been produced copies should be provided within the appendices for the main typologies and the key strategic sites that the Local Plan will rely upon. KM have provided similar appraisal summaries for other local authority areas, including the recently concluded Cheshire East CIL Examination Hearings. This is key evidence which is readily available and should be provide as soon as possible to give all consultees the opportunity to review and make representations as appropriate. Our ability to comment fully on overall viability matters is currently limited by the omission of appraisal summaries from the EVA.

Testing Viability at the Plan Making Stage.

We note the quotes taken from the various sources relating to Viability and Local Plans. Emphasis is increasingly being placed on ensuring that the types of sites and developments planned are deliverable wherever possible without the need for further viability assessment at the decision making stage. This is evident when referring to the updated Planning Practice Guidance.[2]

Whilst this seems a sensible approach, all too often this is not currently possible. Each site is unique and therefore its overall development cost is also unique. Any area wide approach to viability therefore needs to ensure that the vast majority of development will remain viable even when fully policy compliant. To achieve this, the overall cumulative impact of all the Council's plan polices needs to be carefully assessed and set at a level that allows sufficient headroom to ensure this is the case throughout the plan period.

This is typically done by completing a series of financial appraisals and assessing what if any level of surplus is available to make contributions to affordable housing and other local plan policy objectives. To ensure the long term deliverability of the plan it is good practice not to test the margins of viability and therefore it is widely accepted and that "headroom" needs to be built into appraisals, both within the levels of individual cost and revenue assumptions but

[2] Reference ID: 10-002-20180724 and Reference ID: 10-008-20180724

also when considering what proportion of any final surplus should be considered available for contributions to local plan polices. In many cases headroom of between 30% and 50% is allowed. This was the case in the recent Cheshire East CIL examination hearings we took part in where 50% was adopted. The remaining 50% is the sum available for the funding of plan polices and CIL (if it were to be considered).

Clearly over the proposed plan period economic and market conditions will change considerably on a number of occasions and therefore it is also important to retain a degree of flexibility so that should market conditions deteriorate a good proportion of development can remain viable and developments continue to come forward to meet the overall plan requirements. In periods of economic slowdown (which are bound to occur during the plan period), it is imperative that development is still possible to retain the economic and social benefits that derive from it.

Guidance on Key Appraisal Assumptions.

With this in mind it is important that the key appraisal inputs are conservatively assessed. Given the nature of a residual valuation approach, these assumptions have a significant potential impact on the outcome and any surplus that may be available is normally only a small percentage of the total gross development value. We will make more detailed comments on the individual appraisal assumptions in other areas of our consultation response.

Whilst the price paid for land is not deemed to be a relevant justification for failing to accord with policies in the plan it is critical that the "base input" land cost is set at a level that provides a real incentive for landowners to either bring their sites to the market or to invest directly themselves in promoting the sites through the planning system. Whichever route is taken there is a considerable financial risk given the uncertainties around obtaining planning consents and the subsequent ability to achieve a successful sale. Long periods of time can be required to successfully promote sites during which both market conditions and individual circumstances can change. There has to be a significant potential return to the landowner to motivate them to either promote the site themselves or enter into an agreement with a third party to do so.

It is also critical that the cost of all plan polices are fully and realistically costed and detailed item by item. All too often appraisals fail to incorporate these costs fully and make no allowance for the cost of these polices increasing year on year whilst the review of the impacts is only periodic.

The Planning Practice Guidance on Viability states that ***…."The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."…***[3] If this aim is to be achieved then the appraisals produced will need to include for an objective assessment of likely abnormal costs that developments will

[3] Paragraph 002 Reference ID10-002-20180724

also incur otherwise there will continue to need to be detailed site specific assessments. At present abnormal costs have been specifically excluded from KM's total cost assessments.

Similarly for many larger strategic sites there are significant opening up costs which often go un-assessed or significantly under assessed when part of an area wide assessment of this type. This cost item is dealt with within the detailed guidance contained in ***Viability Testing Local Plans, Advice for planning practitioners (the Harman Report***). Opening up costs are identified in Appendix B item 2 as ***...."strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes".***[4]

KM have made allowances for opening up costs in table 5.4 at paragraph 5.44 of the EVA which increase from zero from small sites of up to 14 dwellings up to £8,300 for sites of 200 units and over which is approximately 40% of the cost advocated by Harman. This allowance therefore appears low but does needs to be considered as part of the total development cost allowance.

Larger sites will also have additional costs associated with their promotion through planning. This has been widely accepted and adopted elsewhere and should be reflected in the fee percentage adopted. Again the Harman Report makes detailed reference to these costs in item 4 of Appendix B:

"…..Many viability studies incorporate an assessment of fees based solely upon a percentage of house-building costs. While this may be appropriate in relation to smaller scale sites, such an approach may underestimate the costs associated with the promotion and implementation of larger, more complex schemes.

Such costs may include:

- ***Outline application costs***
- ***Local Plan promotion***
- ***CIL Examination in Public representation***
- ***Environmental statements***
- ***Design and access statements***
- ***Masterplan and design codes***
- ***Public consultation costs***
- ***The discharge of planning conditions and approval of reserved matters***
- ***Planning application fees***
- ***Project management costs***
- ***Building regulation fees***
- ***Statutory undertakers' fees, including bonding costs.***

Figures for fees relating to design, planning and other professional fees can range from 8 -10% for straightforward sites to 20% for the most complex, multi–phase sites. In circumstances where the Local Plan is reliant upon large scale sites in order to accommodate its assessed housing requirement, consideration should also be given

[4] Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 2, Page 44

to the additional planning promotion and land assembly costs necessarily incurred in the manner described in Step 2 (Threshold and Benchmark Land Value).”[5]

Whilst the above list is by no means definitive it is clear that the costs associated with the initial assessment and subsequent promotion of large residential and mixed use sites are significant. These costs need to be fully reflected within the appraisals proposed, with appropriate levels of fees and opening up costs included.

If SHC wish to minimise the need for future site specific viability assessments then the general assumptions used in the proposed viability appraisals need to be cautious in their overall approach, incorporate the appropriate level of construction costs and allow for significant headroom. By adopting this approach modest changes in economic conditions should not render all sites unviable and only those sites with significant abnormal costs will in normal market conditions incur viability issues and therefore need some relaxation of local plan policy requirements. If this approach is not adopted, then there will continue to be the need for site specific viability appraisals, which will impact on overall housing delivery and on affordable housing provision in particular.

[5] Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 4, page 44-45

4. Evidence, Analysis & Appraisal Assumptions.

At present there is insufficient information provided within the KM report to make a full assessment of the various viability assumptions proposed. As stated above it would greatly assist all consultees if copies of the viability appraisal summaries were provided. Notwithstanding the above, our current observations are as detailed below:

Development Mix And Density.

The development dwelling mix and resultant density is a critical assumption and needs careful consideration. Development densities are often referred to in terms of the number of dwelling per hectare (DPH) however this is only part of the picture and whilst it is reasonable for SHC to have a target density of typically 30 dwellings per net hectare or higher in more urban locations, densities will vary from site to site dependent upon the site location, and characteristics of the surrounding area, topography, social and economic factors and market conditions. In some cases a lower density may be more appropriate, for example sites in edge of settlement locations which were formally open countryside or Greenbelt. It is often the case that on larger sites, to achieve varying character areas, densities will be variable. In addition it is important to identify the SHC are seeking to promote larger homes as part of their housing strategy and accordingly, a lower density will be necessary.

Just as important is the actual mix of house types and the sizes of each type of dwelling. It is the combination of the number of dwellings per hectare, the mix of house types and the individual house type unit size which drives the actual development density and therefore the resultant overall gross development value.

Whilst we accept it is common to see a range of development densities the planning constraints placed on development layouts are generally common and have a significant impact on the quantum of development that can be achieved. The majority of councils will look to have broadly similar “standards” they seek to achieve relating to privacy distances and overlooking issues, the size of private amenity space, parking standards and road layouts, etc. These constraints to a great extent dictate the density of development that can be achieved.

Whilst greater density can be achieved (in terms of m2 per hectare or square feet per acre) by for example utilising a larger proportion of terraced house types or three storey dwellings, these will generally also achieve a lower sales value compared to detached housing at lower density. Developments that are of a higher density will have a different appearance and will generally also tend to achieve lower sales values, though the impact can be ameliorated to some extent through the use of higher quality design, materials and finish, though this will impact on the development cost.

We support the general approach of testing a range of sites typologies as set out in table 3.4 on page 25 of the EVA however, what is not clear is what if any adjustment to the housing mix has been made when completing the appraisals for the 30DPH, 35DPH and 40DPH

scenarios. Without this detail we are unable to comment fully on the suitability or robustness of the assumptions.

From the limited information provided in the EVA we would make the following initial comments on the individual assumptions proposed.

Dwelling Sizes.

KM discusses at some length from page 25 to 29 of the EVA development densities, mix and unit sizes.

They refer to analysis they have completed on dwelling mix and sizes from recent planning permissions and refer to these in tables 3.8 and 3.10 and compare them to the assumptions made in previous viability work from 2016 and from the housing mix recommended within the councils SHMA.

It is not clear how recent applications have been analysed, however the KM analysis closely accords with the previous assumptions from the 2016 viability work and the councils SHMA and therefore they have decided to maintain the previously applied assumptions on mix and dwelling sizes.

This being the case the mix maintains a 1 bedroom house type at 56m2 however there is no corresponding evidence for such a house type within the planning application analysis. This is not surprising as we are unaware of any developer seeking to develop such a property, we would therefore recommend either its removal from the dwelling mix or its replacement with a 1 bedroom bungalow type which would at least be a theoretically feasible (if unlikely) option.

The sizes proposed by KM are set out in Table 1 below:

Dwelling Type	1 Bed House	2 Bed House	3 Bed House	4 Bed House	5 Bed House	1 Bed Flat	2 Bed Flat
Dwelling Size Proposed Sq m	56	70	84	109	139	56	70
Dwelling Size Proposed sq ft	603	753	904	1173	1496	603	703

Table 1: Average Dwelling Sizes adopted in the EVA.

GDS believe that the methodology adopted is too simplistic and is not sufficiently representative of the range of sizes for a particular house type that will be delivered across the borough, dependent on the market location. It also fails to differentiate between terraced, semi detached or detached house types. There is also no reference to 3 storey house types or Bungalows that we understand are also proposed within the housing mix.

Whilst there is less margin for error with the smaller house types i.e. the 1, 2 and 3 bed dwellings due to a smaller range in sizes, the inappropriateness of the adopted methodology is illustrated when considering the larger properties. For instance KM has assumed all 5 bed

houses at 139m2 irrespective of the market location. The size of a 5 bedroom house can vary widely dependent upon both the location, size of the development site and the developer profile, from as little as around 120m2 up to around 250m2.

To adopt a single average size for the house types is too broad-brush and consideration should be given to a range of sizes which better reflect the specific market locations. It is however also important to recognise that when adopting a larger house type size there will inevitably also be an impact on the DPH. You cannot simply apply the same mix and unit size to a 40 DPH scheme as you would at 30 DPH. For a 40 DPH dwelling mix we would expect no 5 bedroom detached houses would be included for example.

Included within the KM table 3.11 are 1 and 2 bedroom flats However, it is not clear how these are relevant as it is not specified how, if at all they are included in the proposed dwelling mix as outlined in the table 2.3 on page 12 of the EVA. The mix proposed gives no breakdown for the proportions of 4 and 5 bedroom houses and for all dwelling types provides a range of percentages. From the information provided, therefore, it is impossible to calculate what actual development density is being proposed in terms of the total square feet per acre (metres per hectare). We are therefore unable to comment fully on its appropriateness.

Our overall comment is that as an “average” the unit sizes proposed are reasonably representative of 2 storey detached for the 4 and 5 bedroom units.

For the 3 bedroom units it is not representative of a semi detached or terraced unit which would be smaller at between 770 sq ft and 870 sq ft.

Similarly for 2 bedroom terraced or semis detached we would expect them to be in the region of 675 sq ft to 720 sq ft in this area.

When considering bungalows then as they will have less circulation space 600 sq ft would be appropriate for a 1 bedroom unit and 675 sq ft for a 2 bedroom bungalow.

The apartment sizes adopted are also larger than we would expect in SHC area with a more typical 1 bedroom apartment averaging 525 sq ft and a 2 bedroom apartment 650 sq ft.

Gross to Net Site Ratios.

The gross to net areas proposed in Table 3.6 on page 26 of the EVA have been applied to the generic assessments of a range of sites from 5 to 200 dwellings.

We would point out that not all small sites will have a 100% developable area and it may therefore be prudent to adopt say a 95% gross to net ratio for the smallest sites.

KM state that for the larger site specific assessments of sites allocated for new development they have based their assumptions on the site areas, densities and capacities as set out in table 2.2 on page 9 of the EVA.

Whilst this is a reasonable approach, in itself this will not impact significantly on viability though sites with larger areas of undeveloped land will tend to require an increased budget for external works, open space set up and management, etc. It is the assumptions surrounding the density of development in terms of the square feet per acre (square metres per hectare) as outlined above which are of far more significance in reaching a suitably realistic and cautious view on viability. Without access to actual copies of the development appraisals it is not possible for us to reach a firm conclusion on the appropriateness of the densities appraised.

Densities/Acre (Hectare).

As referred to above, there is currently insufficient detail within the EVA to make a detailed assessment of the assumptions proposed. We are therefore unable to calculate the actual density proposed as it is unclear, if, for example, flats are included within the mix or what is the proposed split between 4 and 5 bedroom houses, as they are currently grouped together as providing 15-20% of dwellings.

From previous analysis we have carried out elsewhere densities of between 11,500 to 13,000 sq feet per acre (2,640 to 2,985m2 per hectare) would represent a suitably conservative range of assumptions for development density for a typical 2 storey housing only development. This would increase if 3 storey houses were included, or a proportion of apartments but would decrease if bungalows were included.

As referred to above, if densities in excess of 30 dwellings per hectare are to be tested then there needs to be an adjustment to the development mix assumptions so that the actual density of accommodation in terms of metres squared per hectare (sq ft per acre) remains realistic as a cautious assumption for an area wide assessment of this kind. Densities of 40 DPH will necessitate the inclusion of a much higher proportion of smaller terraced or semi detached properties, and either elements of 3 storey housing or some apartments. It cannot be simply assumed that the same 2 storey housing mix can be carried forward.

Use of Appropriate Build Cost Data.

We are concerned that no reference is made to the BCIS data costs which are normally relied upon as a key source of construction cost data for area wide assessments of this kind. Instead KM refers to their internal database, knowledge and experience.

Within the Keppie Massie Report on Construction Costs, at paragraph 2.9, they point out that the BCIS is referenced as an appropriate data source within the latest guidance. It is in fact the only data source so referenced. Whilst alternatives could be considered if they were made available and were based on actual completed projects build cost data. From our recent experience during an examination hearing for another local authority area it has become clear that the database referred to by KM is in fact not based on actual development costs and in fact is based upon viability appraisals from throughout the country. This seriously undermines the utility of the schedule, and means that it should be unfavourably compared to information provided by BCIS data which is based upon actual construction costs not prospective ones.

Whilst some information regarding the background of the KM Database and what it contains, plus a copy of part of the report, was ultimately provided after the examination hearing closed we have still not been provided with any real background as to the inputs and whether this is appropriate evidence to assess likely development costs.

It is our conclusion from an assessment of the limited information obtained on the KM database that it is insufficient, confused and cannot be properly interrogated, nor has a proper explanation of the inputs been provided.

If KM are to persist with relying on this flawed database rather than BCIS costs then it should be produced in full at an early stage so that all parties have the opportunity to review and make detailed representations on its suitability and shortcomings.

It is important to reiterate that the information published elsewhere in respect of the KM database is insufficient and missing critical information that is necessary to understand the information. For any reasonable participant to determine whether the database forms an appropriate evidence base upon which to determine viability. Noting that this is prospective information based on viability assessments and not retrospective information based upon actual build costs (as is the case with the BCIS database) then to even begin to determine whether the costs database is “appropriate” evidence, as a minimum it is considered that the following information is required:

- Type of Developer/organisation that submitted the viability evidence (i.e. national housebuilder, registered provider, land promoter or small developer etc.);
- Site size or density of development;
- Type of dwellings & mix of uses (if any) provided. For example, some schemes may have been for or included apartments;
- Site background. Information regarding the stage that the site was at when the viability appraisal was submitted or what works had been carried out prior to the site being purchased. This type of information is critical to understanding the submitted costs.
- An explanation as to how average figures have been reached.

If the site is for a mixed use details of how they have been treated should be provided, particularly those which have substantial residential elements. It would appear from the information provided to date elsewhere that such schemes have been excluded from the data set.

From our previous analysis of the KM database, it is also not possible to determine the status of each development site when the viability appraisal data is entered into the database. As such we do not know what stage of development or pre-development the sites are at. Some sites within the data set may already have a planning consent and therefore the level of professional fees required by them to bring the site forward will be significantly reduced. Other sites could have had significant elements of enabling works already completed by land owners or site promoters, for example the construction of shared spine roads, service infrastructure and site clearance and remediation which would effectively reduce the construction cost but may have be reflected in the price paid or the site. There appears to have been no attempt to rationalise or normalise these “outliers” from the data to prevent unrealistic skewing of the data.

For a scheme to be brought forward in SHC, all the construction costs would need to be accounted for. It is clear from our previous examination of the KM database that significant costs associated with the schemes within the Database could, and we expect are, missing thereby deflating the average figures and giving a misrepresentative picture in terms of construction and professional costs. This clearly raises issues as to whether it is, therefore, a reliable or robust source of actual development costs.

If KM are to persist with the use of their internal database then it also needs to be made available in a format that is capable of being readily interrogated and commented upon.

KM have claimed their database has been benchmarked against BCIS data However, we have previously 'sense-checked' it against the actual construction costs in the BCIS database and it is demonstrably at odds with it.

We have also previously looked at the make-up of the data set in terms of the scale of developments. Whilst we only have details of scheme size by bands, it is clear that it not representative of the scale of development for which it is being used as a basis for assessing costs in the SHC area. Of the 131 sites within the data set previously provided to us 77 have less than 50 dwellings (58.8%). Only 5 of the sites (3.8%) have over 250 dwellings. A breakdown of the site categories is provided in Table 2 for ease of reference. Given the scale of some of the sites in SHC this is a further anomaly in this use of a data set that is not representative of the sites that are being appraised.

Dwelling Range	Number of Schemes	% of Schemes
0-50	77	58.80%
50 - 150	38	29.00%
150 - 250	11	8.40%
250+	5	3.80%
Total	**131**	**100.00%**

Table 2 - Estimated Breakdown of Scheme Sizes

From our previous limited review of the entries within the table it is clear that it contains errors. As an example, if one looks at the column for fee percentage this should be a calculation of the fee cost as a percentage of all the other development costs (excluding contingency). For the second site in the table (Allerdale May 2012) the fee percentage is quoted as 6.48%. Development costs inclusive of fees are £8,994,147. Fees are £698,116. There is no inclusion for a contingency on this project. The total cost excluding fees is therefore £8,296,031. Fees as a percentage of development cost are actually 8.42%.

As the table had not been provided to us in a useable form we cannot resolve how this error has occurred nor are we able to correct it. We have carried out a similar calculation for a site in the High Peak area dated May 2014. For this site the fee percentage is stated as 8.29%. When calculated correctly after the deduction of the fee cost itself and the contingency cost from the total cost the correct percentage is 9.68%. We have therefore concluded that if the error applies to all sites. Therefore the fee percentage is consistently being understated within the data set. Likewise, we are simply unable to corroborate how the average professional fee figure has been calculated.

In addition, we would highlight that there appears to be other errors within the database. As an example, the St Helens entry dated 10/2013 is for a scheme of between 0-25 dwellings however the floorspace banding is set at 6,500-7,000m2. Even using the higher number of dwellings and lower floorspace banding, an average of 260m2 per dwelling seems to be so unrealistic that we expect the band categorisation is incorrect. Other anomalies such as this may exist, although without having the data in a usable form it is difficult to confirm this. Thus, the form of the database means that proper scrutiny is not possible, and the details produced so far suggest that its content is unreliable. It does not comprise appropriate evidence on the basis of what has been disclosed to date.

We remain of the view given the significant limitations of the evidence provided to support the use of the KM database as highlighted above that it cannot be relied upon. We see no justification for departing from the use of BCIS data as is prevalent in the vast majority of other area wide viability assessments that have been carried out throughout the country by other consultants, particularly when KM propose to use the BCIS data as the basis for the commercial elements on mixed use sites.

It is also unclear how the KM database has actually informed the build costs applied within their viability appraisals as copies of the appraisal summaries are not include within the EVA. If build costs have been based on an analysis and application of the KM database then we are unsure of the relevance of much of the detail contained within Report on Construction Costs which appears to suggest that the build costs have actually been derived from a cost plan based on a range of assumptions as set out in that report.

Keppie Massie Report on Construction Costs.

Appendix B of the KM report on construction costs includes a number of tables which identify the various site typologies appraised at the various densities for Greenfield and Brownfield sites.

Within the tables the total construction cost is identified and also then expressed as an average cost per square metre. No breakdown of how the cost has been arrived at is provided and we are unable to determine the basis of the KM “Total Cost” with any certainty from the information in the report however our interpretation of their approach to total costs is set out below:

From the information provided we believe the total cost referred to in these tables includes:

- All plot build costs for both sub and superstructures
- All preliminary costs
- All external works

It is clear from paragraph 2.23 that the cost of constructing garages for larger house types is included as part of the KM external works costs but no detail is provided on the actual cost included for this item.

There is a list of excluded items which are common to all scenarios set out on each table. The excluded items are:

- White goods/ appliances
- Incentives
- Floor Finishes
- Remediation of contaminated land in Brownfield sites
- Vat excluded from all costs
- Contractors profit excluded
- No allowance for code for sustainable homes compliance
- No abnormal costs on Greenfield sites

We disagree with the exclusion of the cost of white goods / appliances as these are included within standard specifications for most developers. Similarly tile finishes to bathrooms are commonly included. The cost of incentives should be reflected in the net sales values adopted as we refer to below.

We believe certain other items have been excluded from these costs as within the Viability Testing results section of the report the impact of these items is separately identified. These are:

- S106 Costs
- M4(2) and M4 (3) costs
- Education contributions

It is however unclear if the costs are also inclusive of other items but our interpretation of paragraph 6.03 of the EVA is that the build costs referred to in the various tables in Appendix B of the report on construction costs also include allowances for:

- Surface water attenuation
- Provision of opens space for developments greater than 40 dwellings
- Sustainable Drainage Systems
- Ducting for cable and broadband.

It is also unclear if the cost of other opening up costs is included within the total cost. Paragraph 2.24 states open space costs have been costed separately but no details are provided. For opening up costs the table at paragraph 2.36 indicates a range of costs from Zero for sites of up to 14 dwellings to £8,300 per dwelling for sites of over 200 units. We would point out that this figure is significantly below the range of cost allowance advocated in the Harman report[6] of £17,000 to £23,000 for large strategic sites.

The KM Cost report also confirms that they have made separate cost allowances for professional fees of between 7.5% for small sites decreasing to just 5% for larger sites. This approach is completely contrary to the advice in the Harman report as referred to in detail in section 3 of this report. It is also at odds with the approach adopted by all other council advisors we have encountered. Larger sites will tend to have a wider range of more complex issues to resolve which will increase the need for specialist consultants and consultants of

[6] Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 2, Page 44

greater experience. It is our experience that the fee costs tend to increase with the scale of projects not decrease.

We have recently reviewed the allowance made in over 30 other local authority areas and in all other cases (with the exception of those where KM have been involved) the fee percentage adopted has been in the range of 8% to 12%. For those authorities where a range of fees were adopted the fee percentage increased as the scale of the development increased.

We would therefore recommend that an allowance of 7% is adopted as a minimum assumption for smaller sites and that this should increase for large sites to between 10% and 12% depending on scale and complexity

Finally KM have made a contingency allowance of 5% on all development costs, including professional fees which is a standard allowance for area wide assessments of this kind.

Given the KM cost tables refer to “total costs” we can only assume that these items are also included in the costs quoted.

Contractor Profit.

KM also state that they will also adjust the build cost rate that they derive from their own database to exclude construction profit. However, it is unclear how they will calculate this. We do not agree with this approach and question how they determine which sites were built out by a main contractor and which were developed by in house teams and subcontractors.

Whilst we accept that some sites will be built utilising a main contractor whilst others will be procured by an in house team utilising subcontractors, the overall costs will be broadly similar as regardless all contractors include a profit margin within their cost. In addition a developer who procures their own subcontractors will have to directly employ additional staff to manage the construction which adds to the overall development cost.

The approach proposed by KM If adopted would lead to an under assessment of costs which many developers would not be able to achieve.

Comparison of KM Costs Against Recognised Alternative Data.

To reach any conclusions on the costs adopted by KM is very difficult without sight of the detailed appraisal summaries. However, if our interpretation of the costs is correct then for a typical 200 unit Greenfield scheme providing 30% affordable housing at a density of 35DPH the KM total cost equates to £1,147/m2 (£106.56/ft).

To try and put this “Total Cost” into some perspective we have considered the BCIS cost data for the St Helens area. A copy is attached at Appendix A.

In many of the area wide assessments we have reviewed in recent years a figure close to the BCIS median cost data has been utilised. For the St Helens area in Q4 2018 the median cost for Estate Housing Generally was reported at £1189/m2 (£110.46). To enable a meaningful

comparison with the proposed KM cost a number of adjustments need to be made to the base cost.

The BCIS data does not include for the cost of any external works and therefore a widely accepted and utilised approach is to allow for these works by adding around 12% to 15% to the reported base build costs depending upon the scale and layout of the individual site. For an area wide assessment of the kind this represents a suitably cautious assumption.

For larger sites there is, as highlighted above, the need to reflect opening up costs, the cost of which are detailed in the Hardman Guidance and again widely adopted in other area wide assessments of this kind. These costs are in addition to the normal external works allowance.

Is should also be noted that the BCIS costs do not include for the cost of construction of private garages. When completing the detailed appraisals this cost needs to be separately identified for those properties where either single or double will be provided. An appropriate cost for a single garage is around £6000 whilst for a double garage we would allow around £11,000.

Based on BCIS median and lower quartile costs the total cost for a typical 200 dwelling site is summarised in the table below. It should be noted that these costs do not include any allowance for opening up costs or site specific abnormals, garages for 3, 4 and 5 bedroom houses or the costs of the proposed SHC policies in relation construction standards, education and other S106 items.

Cost Item	£/ft	Cost Item	£/ft
BCIS Median Base Build Cost	110.46	BCIS Lower Quartile Base Build Cost	97.45
External Works 15%	16.57	External Works 15%	14.62
Professional Fees 8%	10.16	Professional Fees 8%	8.97
Contingency 5%	6.86	Contingency 5%	6.05
Total Cost	**144.05**	**Total Cost**	**127.08**

Table 3: Greenfield Development Costs Based on BCIS Standard Assumptions.

By reference to the widely supported and referenced BCIS data with typical allowances for external works, professional fees and a contingency we would expect total costs to fall somewhere in the range of £127.08/ft to £144.05/ft subject to individual site factors subject to appropriate additions for the provision of garages, additional opening up costs on larger sites and abnormal costs.

It should also be noted from the BCIS data at Appendix A that the build costs for small developers are significantly higher. We would recommend that figures that closely accord with the BCIS median cost for “One Off” housing detached (3 units or less) are utilised for the appraisal of the 5 unit schemes (£1777/m2 or £165.08/ft) and that for the 10 to 20 dwelling schemes an appropriate base cost would be somewhere around the mid-point between this cost and the Estate Housing Generally cost of £1119/m2 (£110.46/ft) with the appropriate additions for external works, professional fees and contingency to reflect the bespoke nature of smaller developments.

In contrast the KM Cost report proposes a range of “Total Costs” from £104.42 for the largest 200 dwelling sites up to £130.71 for sites of just 5 dwellings or fewer.

Apartment Block Costs.

In Appendix C of the EVA Keppie Massie have adopted a different approach to costs for apartment blocks. Here they have provided a series of cost summaries which set out the individual cost build up for substructures, super structures, external work, preliminaries, professional fees and an overall contingency allowance. From the total of these cost elements there is a 6.5% reduction applied for contractors profit and overhead. It is not clear why this reduction has been made as whilst we are aware Keppie Massie have applied a similar reduction when assessing costs based on BCIS costs, as is highlighted by the comparative costs in Table 4 below this “cost plan” is clearly not based on BCIS costs.

KM "Cost Plan"	£/ft	BCIS Cost Base	£/ft
Base Cost	99.42	BCIS Median	128.76
External Works 14.22%	14.14	External Works 14%	18.03
Professional Fees 7%	7.95	Professional Fees 8%	11.74
Contingency 5%	6.08	Contingency 5%	7.93
minus 6.5% Contractor	-8.29	Zero Contractor Deduction	0.0
Total Cost	**119.29**	**Total Cost**	**166.46**

Table 4: Greenfield Apartment Cost Comparison KM Cost Plan against BCIS Costs.

To enable comparison with the BCIS base cost the KM base cost is made up of their costs for sub structures, superstructures and preliminaries.

As can be seen from the table the Keppie Massie base cost is almost £30/ft (circa 23%) less than the comparable the BCIS median cost and would also be £13/ft (circa 11.5%) less than the lower quartile BCIS cost using the same assumptions.

Proposed Planning Polices and the Impact on Development Costs.

KM have considered the impact of the proposed local plan polices and identified those which will have an impact on development costs. They have then made an assessment of the likely cost of each item. We support this approach and comment further on each item below.

Building Regulations Optional Standards.

We note that an allowance of £1,100 per house is proposed to meet the requirements of Building Regulations Optional Standards M4(2) relating to accessible and adaptable dwellings and £5,500 per house to achieve M4(3A). A build up has been provided for each of these additional cost items. Whilst these costs are generally appropriate it is not clear what assumptions have been made on the impact on the net sales values of the adapted properties as the appraisal summaries have not been included within the EVA.

Electric Vehicle Charging Points.

KM have considered the costs associated with electric vehicle charging points and state an allowance of £220 per dwelling has been made. The allowance is low and we would expect a cost of £300 to £350 to be more typical. Whilst in itself the impact on viability is minor for the cost of the works on individual dwellings there is the potential for a significant increase in the overall electricity supply requirement for a site. Our client's recent experience on a large strategic Green Belt release in Chester where charging points have been required on all plots deriving from policy, this has resulted in the need for substantial additional reinforcement of infrastructure and additional substation requirements to meet the additional loading requirements. These costs are currently not reflected within the KM allowance.

Site Specific S106 costs.

There is an allowance of £1,000 per dwelling currently proposed to cover the cost of all site specific S106 requirements. Whilst this may be sufficient on some small scale developments where S106 contributions are very limited for the majority of larger sites this would be inadequate. Any site that is required to make contributions to any off site facilities or services will incur a far higher level of cost. We would recommend that a schedule of likely residual S106 contributions is included within any subsequent consultation with each item costed in detail so as to ensure the sum included within appraisals is robust rather than an arbitrary nominal allowance. We would expect the true cost to be significantly higher.

Items that remain subject to S106/S278 contributions may include:

- Open Space
- Public Transport
- Highway Improvements
- Infrastructure or Services
- Footpaths and Cycleways
- Community Facilities
- Health Care
- Leisure Services
- Ecology

Conclusions on Reliance on KM Cost Database.

We have significant concerns regarding the use of the KM database. Instead the base development cost should be taken from the relevant BCIS data adopting the appropriate values for the St Helens area, with appropriate allowances then made for external works, professional fees (at varying percentages to reflect the scale and complexity of developments) and an overall contingency. In addition larger sites should include an allowance for opening up costs.

The BCIS costs are specifically referenced as an appropriate source with the latest NPPF guidance note and are utilised in the vast majority of other assessments of this type. The BCIS costs are based on actual costs whereas the KM data base is not.

The data received by KM is from a range of third parties cost estimates with a wide range of different unknown assumptions within it. It is clear from the limited information we have seen elsewhere that it is unreliable and not correctly analysed. It remains unclear how the KM database has informed the "Total Cost" adopted in the KM cost report and we would welcome further explanation alongside the provision of the detailed appraisal summaries.

Residential Net Sales Values.

With regard to the residential net sales values proposed, we have carried out our own analysis of sites currently available and these broadly support the net sales values adopted.

There is however a need for caution when analysing headline asking prices. The vast majority of developers will offer significant incentive packages (free carpets, fitted furniture, upgraded appliances, stamp duty payments, etc.) in addition to the help to buy initiative which is prevalent on most sites, makes the calculation of a true net sale price difficult. Assessing a true net sales value becomes far more difficult when developers also offer part exchange deals on buyers old homes.

Depending on general market conditions, the levels of completion from other sites, the marketing approach of the individual developer and the specific characteristics of the site itself the level of incentives can vary significantly, but would typically be around 5% in strong market conditions but can rise to 10% when the market deteriorates or if a particular site is not performing well.

Affordable Housing.

In terms of affordable housing provision, we would recommend a range of tenure assumptions are appraised as for more challenging sites a different tenure mix may enable some affordable housing to remain viable.

The EVA sets out that the bid prices adopted for testing are as follows:

- Affordable Rent 45% of market value
- Low Cost Home Ownership 70% of market value

The rent caps on affordable units announced by the government during 2015 have effectively put Registered Providers on hold and meant that rental offers are being reduced for social rent properties. Many developers that GDS are working with are facing difficulties in receiving any offers at all from Registered Providers to take on social rent housing, and where offers are made they are typically reduced to approximately 35% of market value. An appropriate discount reflective of the market is:

- Affordable Rent 40% of market value
- Intermediate 65% of market value

Benchmark Land Values.

We have **r**eviewed the approach currently proposed by KM within the EVA and are broadly supportive of their interpretation of the relevant guidance.

It is important that landowners remain sufficiently incentivised to bring forward their sites so that the council's wider housing delivery needs are met. If benchmark land values are set too low then there is no incentive and landowners, who sometimes have held sites for generations, will take a longer term view and chose to hold the site or look at other alternative development forms.

With regard to the Benchmark Land Values proposed we do not believe the differentiation between Brownfield values and Greenfield values is correct. The £150,000 and £250,000 proposed for Greenfield Sites is significantly below achieved sales values. If a full analysis of current market values was carried out we believe that this would support a much closer correlation between Greenfield and Brownfield values which should be reflected in the Benchmark Land Values adopted.

At present the EVA is assessing some Greenfield sites against benchmark land values of the equivalent of or less than alternative commercial uses, for example Industrial Land Values of £150,000 and Office Land Values of £200,000 have been adopted elsewhere in the EVA, both of which are very conservative assessments of these alternative use values. Our recent experience in other parts of the Northwest would indicate that industrial land is achieving values significantly higher than the £150,000 adopted by KM. The BLV for Residential land needs to be a reflection of the EUV plus a premium. Based on the current BLV's there is no incentive to the landowner to achieve a residential consent for their site.

It also needs to be kept in mind when carrying out area wide assessments of this kind there remains the possibility that additional abnormal costs will still affect a specific site. These may only come to light during a detailed planning application when more intrusive site investigation is undertaken. If there is no buffer provided now then these additional costs can only by paid for by the land owner accepting a reduced value for their site. If the benchmark land value is set too low then this leaves no scope to absorb any additional abnormal costs and the site will not come forward. Therefore either the both the commercial and residential Benchmark Land Values need to be increased or appropriate allowances made for the likely impact of abnormal costs for both Brownfield and Greenfield sites. An increase to the various benchmark land values of around £100,000 to £150,000 would be appropriate and would allow for some level of abnormal costs to be absorbed by landowners whilst still offering them a return on their site.

Acquisition costs.

The 1.8% land acquisition cost is based on 1% of purchase price for agent's fees and legal fees at 0.8%.

GDS agrees that the allowances made are within the range of costs seen in the market but are at the lower end of the range and therefore are not a conservative assumption. The

cumulative impact all the individual assumptions have on a residual appraisal needs to be considered. Even small adjustments can have a significant impact when taken together.

Agents fees can vary from just under 1% to as high as 2.5% therefore we would recommend the fee level is increased to 1.5%.

In addition for the assessment of the smaller generic sites both the agent fee and legal fee should be subject to a minimum cost of £10,000 each as a percentage allowance becomes irrelevant when site values fall to very low levels.

Finance.

The 7% rate suggested is realistic for the majority of developers. However for smaller developers funding remains both difficult to obtain and the costs are significantly more than 7%. In addition to the interest rate applied to the loan facility funders often require valuation fees, arrangement fees, management fees, and exit fees which are usually based on a percentage of the peak facility requirement.

In addition, many funders only provide facilities for limited periods and so developers often find they incur additional costs to extend or renew facilities particularly on sites when predicted development programmes are not met. These additional costs often effectively double the cost of finance to the developer.

For this reason we would recommend that the cost of finance for sites of 30 units or fewer are increased to at least 10%.

Developer Profit.

Similar to our concerns on finance costs, whist we support the 20% of GDV profit margin adopted on larger schemes, though this should be seen as a minimum requirement, with many developers requiring in excess of this amount.

We do not agree that this should be reduced to 17.5% for schemes of 10 units or less. Small developers often rely on funding developments from specialist funders or in some cases high net worth individuals. It is our own experience over many years that in order for them to provide funding profit margins of in excess of 20% are required as a smaller or less experienced developer is often seen as carrying a greater risk. In the current market a small developer would not be able to access funding with a profit margin of only 17.5%. The minimum level that should be adopted is 20% to align with the larger sites.

5. Conclusions.

In Summary whilst we support the general approach to viability testing and the general methodology utilised within the Keppie Massie Economic Viability Assessment we have identified a number of areas for further consideration:

1. For a full assessment of the KM EVA to be possible copies of the various appraisal summaries need to be published for analysis and comment in a similar format to those provided by them in other local authority areas.

2. In relation to the Total Costs referred to in the KM Report of Construction Costs tables it is unclear how this cost is built up. Provision of the appraisal summaries would go a long way to clarifying the position.

4. We are unable to determine the exact level of base build costs proposed for residential housing schemes, however given the level of "Total Costs" of development set out within Appendix B of the KM Report of Construction Costs it would appear they are significantly below comparable BCIS costs both at median and lower quartile cost levels. We are therefore unable to support their use at this time.

5. The base build costs proposed for apartment schemes as set out in Appendix C of the EVA appear to be based on a simplified cost plan with no supporting evidence for the costs proposed. The overall costs are significantly below comparable BCIS costs both at median and lower quartile cost levels. We are therefore unable to support their use.

6. We are unable to support the use of the KM "build cost" database given the inadequacies we have previously identified. Instead BCIS costs should be adopted at the appropriate level for the St Helens area.

7. The KM development costs currently exclude any assessment of abnormal development costs which limits their value at the plan making stage. This being the case, site specific viability assessments will continue to be required on sites where abnormal development costs or significant infrastructure and opening up costs are encountered.

8. The Net Sales Values adopted should reflect an allowance for appropriate levels of sales incentives.

9. Discounts from market value for affordable housing require minor adjustment to reflect a conservative assumption on the current bid values achievable from RSL's.

10. The Benchmark Land values adopted for both residential and commercial uses are low, particularly for Greenfield Residential sites in the medium and higher value areas. In the former the level proposed is below that adopted for commercial office developments and only the same as potential industrial uses, both of which are also set at very low level. At these Benchmark land values there is no incentive to land owners to promote their sites for residential development given they could be depressed further by abnormal costs.

11. Finance costs for small developers should be increased to represent the higher costs of funding they incur.

12. Developer Profit Margins of 20% should be adopted for all developments. Small developers are unable to obtain funding at returns below this level.

We trust that the Council and their advisors will find our comments useful and that the necessary amendments are made now to ensure the results of subsequent detailed viability testing are robust and ensure that the Council's wider housing delivery objectives can be met throughout the plan period.

Appendix 1.

BCIS Data Extract.

BCIS®

RICS

£/m2 study

Description: Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated: 02-Mar-2019 00:39

> Rebased to 4Q 2018 (321) and St Helens (99; sample 31)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810. Housing, mixed developments (15)	1,246	630	1,079	1,214	1,375	2,839	1222
810.1 Estate housing							
Generally (15)	1,228	595	1,049	1,189	1,349	4,207	1740
Single storey (15)	1,379	774	1,179	1,323	1,543	4,207	286
2-storey (15)	1,193	595	1,039	1,162	1,305	2,393	1321
3-storey (15)	1,219	776	989	1,178	1,377	2,521	129
4-storey or above (15)	2,393	1,280	-	2,200	-	3,893	4
810.11 Estate housing detached (15)	1,563	940	1,195	1,372	1,609	4,207	20
810.12 Estate housing semi detached							
Generally (15)	1,222	711	1,053	1,190	1,338	2,261	410
Single storey (15)	1,391	859	1,189	1,362	1,553	2,261	75
2-storey (15)	1,189	711	1,047	1,162	1,297	2,101	315
3-storey (15)	1,110	834	925	1,050	1,202	1,806	20
810.13 Estate housing terraced							
Generally (15)	1,254	771	1,051	1,202	1,382	3,893	359
Single storey (15)	1,384	939	1,148	1,304	1,602	2,025	43
2-storey (15)	1,225	771	1,044	1,187	1,360	2,393	260
3-storey (15)	1,243	776	966	1,178	1,371	2,521	55
816. Flats (apartments)							
Generally (15)	1,450	706	1,210	1,386	1,634	4,881	964
1-2 storey (15)	1,384	867	1,175	1,326	1,524	2,578	233
3-5 storey (15)	1,428	706	1,204	1,374	1,629	2,865	642
6+ storey (15)	1,797	1,048	1,457	1,691	1,907	4,881	86
820.1 'One-off' housing detached (3 units or less)							
Generally (15)	2,079	839	1,457	1,777	2,577	5,987	138
Single storey (15)	1,601	839	1,337	1,455	1,801	2,902	39
2-storey (15)	2,064	902	1,511	1,861	2,523	4,020	67
3-storey (15)	2,442	1,170	1,703	2,375	2,771	4,539	24
4-storey or above (15)	3,878	1,735	2,480	4,009	5,169	5,987	6

PO3757

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

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I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Appendices to Paper 1 will follow under separate cover.

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

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1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

at this point that the generic development typologies are typically much smaller than the PSLP site allocations.

11.9 The PSLP identifies (10) sites allocated for new housing development up to 31 March 2035. The EVA adopts development densities ranging from 30-40 dph, in line with PSLP Policy LPAOS.

25 11.10 EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10 unit scheme. However, viability results and construction costs within the EVA relate to a 15 unit scheme, and the typology in EVA Table 3.5 requires correction. 25

11.11 The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.

26 11.12 EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with Net Developable Area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units. 26

27 11.13 It is anticipated that sites above this threshold will include larger areas of constraint to development will be required to provide greater areas of public open space – it is noted that three of the council's site allocations are over 20 ha. A Net Developable Area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. 27

28 11.14 EVA Table 3.13 sets out a summary of the key PSLP policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution. 28

Overview of St. Helens

11.15 EVA Table 4.6 contains a comparison of new build and resale property transactions in St. Helens, over a 12 month period from May 2017. The number of sales for each month should be included to provide context and to ensure that the comparison between new build and resale units is based upon an appropriate evidence base.

Financial Appraisal Assumptions

Benchmark Land Values

11.16 In order to establish the base input land costs necessary to provide a competitive minimum return for the land owner, to enable development to be deliverable in line

PO3758

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Appendices to Paper 1 will follow under separate cover.

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

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- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

at this point that the generic development typologies are typically much smaller than the PSLP site allocations.

11.9 The PSLP identifies (10) sites allocated for new housing development up to 31 March 2035. The EVA adopts development densities ranging from 30-40 dph, in line with PSLP Policy LPAOS.

25 11.10 EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10 unit scheme. However, viability results and construction costs within the EVA relate to a 15 unit scheme, and the typology in EVA Table 3.5 requires correction. 25

11.11 The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.

26 11.12 EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with Net Developable Area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units. 26

27 11.13 It is anticipated that sites above this threshold will include larger areas of constraint to development will be required to provide greater areas of public open space – it is noted that three of the council's site allocations are over 20 ha. A Net Developable Area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. 27

28 11.14 EVA Table 3.13 sets out a summary of the key PSLP policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution. 28

Overview of St. Helens

11.15 EVA Table 4.6 contains a comparison of new build and resale property transactions in St. Helens, over a 12 month period from May 2017. The number of sales for each month should be included to provide context and to ensure that the comparison between new build and resale units is based upon an appropriate evidence base.

Financial Appraisal Assumptions

Benchmark Land Values

11.16 In order to establish the base input land costs necessary to provide a competitive minimum return for the land owner, to enable development to be deliverable in line

PO3759

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
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It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

at this point that the generic development typologies are typically much smaller than the PSLP site allocations.

11.9 The PSLP identifies (10) sites allocated for new housing development up to 31 March 2035. The EVA adopts development densities ranging from 30-40 dph, in line with PSLP Policy LPAOS.

25 11.10 EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10 unit scheme. However, viability results and construction costs within the EVA relate to a 15 unit scheme, and the typology in EVA Table 3.5 requires correction. 25

11.11 The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.

26 11.12 EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with Net Developable Area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units. 26

27 11.13 It is anticipated that sites above this threshold will include larger areas of constraint to development will be required to provide greater areas of public open space – it is noted that three of the council's site allocations are over 20 ha. A Net Developable Area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. 27

28 11.14 EVA Table 3.13 sets out a summary of the key PSLP policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution. 28

Overview of St. Helens

11.15 EVA Table 4.6 contains a comparison of new build and resale property transactions in St. Helens, over a 12 month period from May 2017. The number of sales for each month should be included to provide context and to ensure that the comparison between new build and resale units is based upon an appropriate evidence base.

Financial Appraisal Assumptions

Benchmark Land Values

11.16 In order to establish the base input land costs necessary to provide a competitive minimum return for the land owner, to enable development to be deliverable in line

PO3760

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

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The cover letter addressed to [redacted] outlines the component parts of the representations.

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Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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

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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

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SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

at this point that the generic development typologies are typically much smaller than the PSLP site allocations.

11.9 The PSLP identifies (10) sites allocated for new housing development up to 31 March 2035. The EVA adopts development densities ranging from 30-40 dph, in line with PSLP Policy LPAOS.

25 11.10 EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10 unit scheme. However, viability results and construction costs within the EVA relate to a 15 unit scheme, and the typology in EVA Table 3.5 requires correction. 25

11.11 The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.

26 11.12 EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with Net Developable Area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units. 26

27 11.13 It is anticipated that sites above this threshold will include larger areas of constraint to development will be required to provide greater areas of public open space – it is noted that three of the council's site allocations are over 20 ha. A Net Developable Area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. 27

28 11.14 EVA Table 3.13 sets out a summary of the key PSLP policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution. 28

Overview of St. Helens

11.15 EVA Table 4.6 contains a comparison of new build and resale property transactions in St. Helens, over a 12 month period from May 2017. The number of sales for each month should be included to provide context and to ensure that the comparison between new build and resale units is based upon an appropriate evidence base.

Financial Appraisal Assumptions

Benchmark Land Values

11.16 In order to establish the base input land costs necessary to provide a competitive minimum return for the land owner, to enable development to be deliverable in line

PO3761

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

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"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

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11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

with Planning Practice Guidance[47] (hereafter 'PPG') and the NPPF, Keppie Massie has considered a range of land values based on the likely revenues that residential developments would be expected to achieve across the Borough and the availability of land for development. Keppie Massie cite a need to regard evidence of current use values and evidence from sites with [residential] planning permissions, to allow an assessment of Existing Use Value (EUV) plus a landowner's premium; and the influence of supply dynamics.

11.17 EVA Appendix 4 contains details of residential land sales. The residential land sales table displays: affordable housing zone; address; location; developer; site type; no. of units; net area (ha); price paid; price (per net ha); price (per net acre); and date of acquisition. Sources of data are stated as Land Registry, EGi and Co-Star. Peel is not aware that such data sources can provide the net developable area of sites, and the source of such data must be stated to ensure that accuracy and consistency can be checked.

29 29

11.18 Peel acknowledges that specific site sales values must be assessed with some caution as differing levels of constraints can impact on achieved values. They do, however, provide very useful context when assessing the value at which a greenfield land owner may be prepared to release their site for development in comparison with a brownfield site owner. The values proposed as being sufficient to provide a competitive return to brownfield/previous developed and greenfield land owners are set out within EVA Table 5.1, which is repeated below:

30

	Previously Developed		Greenfield	
Affordable Housing Zone	(£ per ha)	(£/acre)	(£/ha)	(£/acre)
1	370,500	150,000	370,500	150,000
2	617,500	250,000	370,500	150,000
3	864,500	350,000	617,500	250,000

Table 5.1: Residential Benchmark Land Value Assumptions

30

11.19 The EVA applies a consistent benchmark land value between brownfield and greenfield sites within the Zone 1 (lower value) area.. However, for Zones 2 and 3 (increasing value) areas, it is proposed that a brownfield land owner would require an uplift of +66.7% and +40.0%, respectively, of the value required by a greenfield land owner.

11.20 The residential land sales evidence within EVA Appendix 4, containing 17 records, suggests combined £per net acre average prices of £160,696 per acre (Zone 1), £285,848 per acre (Zone 2) and £695,204 per acre (Zone 3). The data is heavily weighted towards brownfield sites. Twelve entries are pure brownfield transactions. There are four entries of a greenfield/brownfield mix, which are all within Zone 2 and present average of £251,768 per acre. There is only one pure greenfield entry: Zone 2 at £213,656 per acre.

31

11.21 The data presented in the EVA is insufficient to support the benchmark land value assumptions adopted for greenfield sites and the land sales evidence does not provide

31

[47] Ministry of Housing, Communities and Local Government: Planning Practice Guidance last updated 22 October 2018

PO3762

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

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Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

with Planning Practice Guidance[47] (hereafter 'PPG') and the NPPF, Keppie Massie has considered a range of land values based on the likely revenues that residential developments would be expected to achieve across the Borough and the availability of land for development. Keppie Massie cite a need to regard evidence of current use values and evidence from sites with [residential] planning permissions, to allow an assessment of Existing Use Value (EUV) plus a landowner's premium; and the influence of supply dynamics.

11.17 EVA Appendix 4 contains details of residential land sales. The residential land sales table displays: affordable housing zone; address; location; developer; site type; no. of units; net area (ha); price paid; price (per net ha); price (per net acre); and date of acquisition. Sources of data are stated as Land Registry, EGi and Co-Star. Peel is not aware that such data sources can provide the net developable area of sites, and the source of such data must be stated to ensure that accuracy and consistency can be checked.

29 29

11.18 Peel acknowledges that specific site sales values must be assessed with some caution as differing levels of constraints can impact on achieved values. They do, however, provide very useful context when assessing the value at which a greenfield land owner may be prepared to release their site for development in comparison with a brownfield site owner. The values proposed as being sufficient to provide a competitive return to brownfield/previous developed and greenfield land owners are set out within EVA Table 5.1, which is repeated below:

30

	Previously Developed		Greenfield	
Affordable Housing Zone	(£ per ha)	(£/acre)	(£/ha)	(£/acre)
1	370,500	150,000	370,500	150,000
2	617,500	250,000	370,500	150,000
3	864,500	350,000	617,500	250,000

Table 5.1: Residential Benchmark Land Value Assumptions

30

11.19 The EVA applies a consistent benchmark land value between brownfield and greenfield sites within the Zone 1 (lower value) area.. However, for Zones 2 and 3 (increasing value) areas, it is proposed that a brownfield land owner would require an uplift of +66.7% and +40.0%, respectively, of the value required by a greenfield land owner.

11.20 The residential land sales evidence within EVA Appendix 4, containing 17 records, suggests combined £per net acre average prices of £160,696 per acre (Zone 1), £285,848 per acre (Zone 2) and £695,204 per acre (Zone 3). The data is heavily weighted towards brownfield sites. Twelve entries are pure brownfield transactions. There are four entries of a greenfield/brownfield mix, which are all within Zone 2 and present average of £251,768 per acre. There is only one pure greenfield entry: Zone 2 at £213,656 per acre.

31

11.21 The data presented in the EVA is insufficient to support the benchmark land value assumptions adopted for greenfield sites and the land sales evidence does not provide

31

[47] Ministry of Housing, Communities and Local Government: Planning Practice Guidance last updated 22 October 2018

PO3763

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

with Planning Practice Guidance[47] (hereafter 'PPG') and the NPPF, Keppie Massie has considered a range of land values based on the likely revenues that residential developments would be expected to achieve across the Borough and the availability of land for development. Keppie Massie cite a need to regard evidence of current use values and evidence from sites with [residential] planning permissions, to allow an assessment of Existing Use Value (EUV) plus a landowner's premium; and the influence of supply dynamics.

11.17 EVA Appendix 4 contains details of residential land sales. The residential land sales table displays: affordable housing zone; address; location; developer; site type; no. of units; net area (ha); price paid; price (per net ha); price (per net acre); and date of acquisition. Sources of data are stated as Land Registry, EGi and Co-Star. Peel is not aware that such data sources can provide the net developable area of sites, and the source of such data must be stated to ensure that accuracy and consistency can be checked.

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11.18 Peel acknowledges that specific site sales values must be assessed with some caution as differing levels of constraints can impact on achieved values. They do, however, provide very useful context when assessing the value at which a greenfield land owner may be prepared to release their site for development in comparison with a brownfield site owner. The values proposed as being sufficient to provide a competitive return to brownfield/previous developed and greenfield land owners are set out within EVA Table 5.1, which is repeated below:

30

	Previously Developed		Greenfield	
Affordable Housing Zone	(£ per ha)	(£/acre)	(£/ha)	(£/acre)
1	370,500	150,000	370,500	150,000
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3	864,500	350,000	617,500	250,000

Table 5.1: Residential Benchmark Land Value Assumptions

30

11.19 The EVA applies a consistent benchmark land value between brownfield and greenfield sites within the Zone 1 (lower value) area.. However, for Zones 2 and 3 (increasing value) areas, it is proposed that a brownfield land owner would require an uplift of +66.7% and +40.0%, respectively, of the value required by a greenfield land owner.

11.20 The residential land sales evidence within EVA Appendix 4, containing 17 records, suggests combined £per net acre average prices of £160,696 per acre (Zone 1), £285,848 per acre (Zone 2) and £695,204 per acre (Zone 3). The data is heavily weighted towards brownfield sites. Twelve entries are pure brownfield transactions. There are four entries of a greenfield/brownfield mix, which are all within Zone 2 and present average of £251,768 per acre. There is only one pure greenfield entry: Zone 2 at £213,656 per acre.

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11.21 The data presented in the EVA is insufficient to support the benchmark land value assumptions adopted for greenfield sites and the land sales evidence does not provide

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[47] Ministry of Housing, Communities and Local Government: Planning Practice Guidance last updated 22 October 2018

31 31

a sufficient evidence base to justify the adoption of differential brownfield and greenfield benchmark land values.

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11.22 It is both our and Peel's experience that greenfield land owners will have very strong expectations in respect of the value of their land within the development market and, if it is deemed appropriate for their land to be released for residential development, they will see no reason why they would achieve a lower price than would be achieved for a similar parcel of previously developed land.

11.23 Peel regards the provision of an appropriate explanation of base input land cost as a critical issue in ensuring that the viability of sites are assessed on an appropriate and equitable basis. As it stands, this is not the case. Peel is of the strong opinion that base input land values for greenfield development sites must be increased to parity levels with previously developed land values.

11.24 The Viability Testing Results, set out in section 6 of the EVA, for the generic typologies presents greenfield sites as generating greater viability than brownfield sites – with greenfield schemes in Zones 2 and 3 required to contribute greater proportions of affordable housing than brownfield schemes.

11.25 The assessment of a significantly lower greenfield base input land value within the EVA engineers a result that indicates higher viability for development on greenfield land and lower viability for development on brownfield land. This approach is unreasonable given that the land values are not borne out in reality, with the differential un-evidenced.

11.26 The EVA does not state whether the £/acre benchmark land values are assessed with reference to the net or gross area of a site. Clarity in this regard is essential, as site owners will require that their achieved rate is sufficient to encourage their release of their total (gross) site area.

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11.27 It is assumed that the benchmark land values are provided on a net basis, as this is adopted in the table of site comparables within EVA Appendix 4. When assessed on a gross area basis, the lowest benchmarks will reduce to £112,500 per gross area for larger greenfield sites, which are assumed within the EVA to have a gross:net reduction of 25%. As previously referenced, it is Peel's opinion that larger sites in excess of 20ha will require a 40% gross:net reduction. Should this be applied within the EVA, it would reduce the lowest benchmark land values to £90,000 per gross acre, which is regarded as wholly insufficient to facilitate the release of a site for development.

11.28 It is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify the concerns raised by effectively establishing and seeking to agree appropriate benchmark land values, which will be sufficient to incentivise market delivery, prior to the Examination of the PSLP. PPG is clear on the importance of this process in ensuring the evidence base is robust:

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inappropriate and detailed information in respect of adopted abnormal costs are requested.

11.54 Peel request that further reasoning and methodology should be provided in respect of previously developed and greenfield site abnormal costs to ensure that the viability appraisals are carried out on a reasonable and equitable basis for all sites.

11.55 A S106 contribution of £1,000 per dwelling is referred to in EVA Paragraph 5.54. As noted earlier in this representation, there is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous developments should be provided by the Council to corroborate the level of S106 contribution.

40 40

Developer's Profit and Overhead

11.56 Profit level is set out within EVA Paragraph 5.68 as equating to 17.5% of GDV applied to smaller housing schemes of 10 or less dwellings. For scheme assessments which include no on-site affordable housing, Peel regards the proposed level as low, overstating viability in comparison with the widely accepted minimum industry profit level of 20% of GDV.

11.57 EVA Paragraph 5.76 states that, in the context of most forms of commercial development, the developer will typically seek a profit requirement of approximately 15% on cost. This figure was applied to all forms of non-residential development for testing and is regarded as insufficient, falling below the widely accepted commercial profit requirement equating to 20% on cost.

31 31

Viability Testing Results

Residential

11.58 EVA Tables 6.1-6.18 summarise the outputs of the viability appraisals for the generic typology schemes. The results of the site specific allocations are displayed in EVA Table 6.19 and at EVA Appendix 6. The commercial results are summarised within EVA Table 6.20.

11.59 Development in the lowest value area (Zone 1), which contains a nil affordable housing requirement for both brownfield and greenfield sites, is characterised as generally unviable on brownfield sites at all tested densities, and only demonstrating positive viability on greenfield sites at densities of 35 dph and above. A significant volume of the PSLP's identified development land supply (2,321 units) is proposed to be delivered in Zone 1 locations, and such delivery must be regarded as unviable on the basis of the Council's own EVA evidence base, indicating that the Council's housing requirement is unachievable.

11.60 Development on brownfield sites within the generic testing typologies begins to demonstrate positive viability within Zone 2 at a minimum density of 35 dph (and above). Similarly, Greenfield development only generally begins to become viable within Zone 2 at a minimum density of 35 dph. Only the smallest greenfield developments within Zone 2, at 10 dwellings or less, demonstrate positive viability at 30 dph.

11.61 Within Zone 3, all sites (brownfield and greenfield) demonstrate positive viability at 30pdh and above, except for one brownfield scheme of 25 dwellings, with a marginally negative viability. The EVA determines that Brownfield sites can viably accommodate 10% affordable housing, with greenfield site at 30% affordable housing.

31 11.62 From the EVA Tables 6.1-6.18 it is clear that there is a differential between the results of the greenfield and brownfield appraisals, albeit the general assumptions are unchanged between the two categories of assessment. 31

11.63 This is regarded as inappropriate, with no support from Peel's experience in land transactions and market expectations.

11.64 Appropriate revisions to the greenfield land values will reduce the reported levels of viability.

11.65 Revisions to base construction costs applied in the EVA and clarity in respect of all wider cost inputs are required. Again, the results of site viability within the EVA will be reduced following the adoption of realistic and evidenced costs.

Non-Residential

11.66 EVA Table 6.20 (Commercial Viability Testing Results – Generic Typologies) presents negative viability results for Offices (Out of Town) (-£580 to -£734); Industrial B1/B2/B8 (-£19 to -£453); Retail (Comparison) (-£4 to -£68); and Hotel (-£348). 40 40

11.67 The only positive surpluses were established for Retail (Convenience) (£95 to £465) and an Industrial (B8) development of larger scale, demonstrating a £17 surplus.

11.68 The viability testing for commercial developments presents mixed results. The EVA states that development is unlikely to come forward on a speculative basis.

11.69 However, it is Peel's opinion that the current adopted profit (15% of costs). The EVA proposes that schemes will come forward solely where owner occupier driven, but this is not regarded as an appropriate basis to assess the overall level of achievable commercial delivery within the PSLP.

Next Steps

11.70 Peel requests that the matters raised within this representation, in respect of the EVA, are addressed by Keppie Massie in their role as independent advisors to the Council. Updated evidence, in the form of an EVA addendum or update, should be published for formal stakeholder review and comment in advance of the Examination of the PSLP.

11.71 Critical to the success of producing this EVA addendum will be a further, meaningful process of industry engagement. Specifically, in accordance with PPG, it is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify stated concerns by effectively establishing and seeking to agree appropriate inputs into the EVA. Engagement to date has been insufficient to address the outstanding issues raised.

PO3764

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

31 31

a sufficient evidence base to justify the adoption of differential brownfield and greenfield benchmark land values.

32 32

11.22 It is both our and Peel's experience that greenfield land owners will have very strong expectations in respect of the value of their land within the development market and, if it is deemed appropriate for their land to be released for residential development, they will see no reason why they would achieve a lower price than would be achieved for a similar parcel of previously developed land.

11.23 Peel regards the provision of an appropriate explanation of base input land cost as a critical issue in ensuring that the viability of sites are assessed on an appropriate and equitable basis. As it stands, this is not the case. Peel is of the strong opinion that base input land values for greenfield development sites must be increased to parity levels with previously developed land values.

11.24 The Viability Testing Results, set out in section 6 of the EVA, for the generic typologies presents greenfield sites as generating greater viability than brownfield sites – with greenfield schemes in Zones 2 and 3 required to contribute greater proportions of affordable housing than brownfield schemes.

11.25 The assessment of a significantly lower greenfield base input land value within the EVA engineers a result that indicates higher viability for development on greenfield land and lower viability for development on brownfield land. This approach is unreasonable given that the land values are not borne out in reality, with the differential un-evidenced.

11.26 The EVA does not state whether the £/acre benchmark land values are assessed with reference to the net or gross area of a site. Clarity in this regard is essential, as site owners will require that their achieved rate is sufficient to encourage their release of their total (gross) site area.

32 32

11.27 It is assumed that the benchmark land values are provided on a net basis, as this is adopted in the table of site comparables within EVA Appendix 4. When assessed on a gross area basis, the lowest benchmarks will reduce to £112,500 per gross area for larger greenfield sites, which are assumed within the EVA to have a gross:net reduction of 25%. As previously referenced, it is Peel's opinion that larger sites in excess of 20ha will require a 40% gross:net reduction. Should this be applied within the EVA, it would reduce the lowest benchmark land values to £90,000 per gross acre, which is regarded as wholly insufficient to facilitate the release of a site for development.

11.28 It is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify the concerns raised by effectively establishing and seeking to agree appropriate benchmark land values, which will be sufficient to incentivise market delivery, prior to the Examination of the PSLP. PPG is clear on the importance of this process in ensuring the evidence base is robust:

32 *In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.*[48] 32

11.29 Engagement to date has been insufficient to address outstanding issues raised.

Commercial Land Values

33 11.30 Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided. 33

11.31 In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review. 34 34

Residential Appraisal Assumptions

Development Programme

11.32 EVA Paragraph 5.30 proposes a sale rate of *"between 2 and 3 per month"*. It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35 35

11.33 EVA Paragraph 5.31 refers to sales rates that *"tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem."* An adopted rate *"from 4 up to 10"* per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a *"premium above prevailing values"* is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

[48] MHCLG (2018) Planning Practice Guidance - Viability

PO3765

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
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To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

32 *In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.*[48] 32

11.29 Engagement to date has been insufficient to address outstanding issues raised.

Commercial Land Values

33 11.30 Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided. 33

11.31 In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review. 34 34

Residential Appraisal Assumptions

Development Programme

11.32 EVA Paragraph 5.30 proposes a sale rate of *"between 2 and 3 per month"*. It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35 35

11.33 EVA Paragraph 5.31 refers to sales rates that *"tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem."* An adopted rate *"from 4 up to 10"* per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a *"premium above prevailing values"* is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

[48] MHCLG (2018) Planning Practice Guidance - Viability

PO3766

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

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13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

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See section 11 of Paper 1

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:
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SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

32 *In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.*[48] 32

11.29 Engagement to date has been insufficient to address outstanding issues raised.

Commercial Land Values

33 11.30 Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided. 33

11.31 In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review. 34 34

Residential Appraisal Assumptions

Development Programme

11.32 EVA Paragraph 5.30 proposes a sale rate of *"between 2 and 3 per month"*. It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35 35

11.33 EVA Paragraph 5.31 refers to sales rates that *"tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem."* An adopted rate *"from 4 up to 10"* per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a *"premium above prevailing values"* is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

[48] MHCLG (2018) Planning Practice Guidance - Viability

PO3767

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

Think of the environment, please do not print unnecessarily
This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

Think of the environment, please do not print unnecessarily
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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

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The cover letter addressed to [redacted] outlines the component parts of the representations.

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

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Appraisal Methodology

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11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

32 *In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.*[48] 32

11.29 Engagement to date has been insufficient to address outstanding issues raised.

Commercial Land Values

33 11.30 Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided. 33

11.31 In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review. 34 34

Residential Appraisal Assumptions

Development Programme

11.32 EVA Paragraph 5.30 proposes a sale rate of *"between 2 and 3 per month"*. It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35 35

11.33 EVA Paragraph 5.31 refers to sales rates that *"tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem."* An adopted rate *"from 4 up to 10"* per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a *"premium above prevailing values"* is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

[48] MHCLG (2018) Planning Practice Guidance - Viability

PO3768

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

Think of the environment, please do not print unnecessarily
This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

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Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

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Development Programme

11.32 EVA Paragraph 5.30 proposes a sale rate of *"between 2 and 3 per month"*. It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35 35

11.33 EVA Paragraph 5.31 refers to sales rates that *"tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem."* An adopted rate *"from 4 up to 10"* per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a *"premium above prevailing values"* is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

[48] MHCLG (2018) Planning Practice Guidance - Viability

36 within their testing. Peel request that evidence of Keppie Massie's experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites. 36

11.37 In respect of Affordable Housing, EVA Paragraph 5.38 states that the values adopted are based on the likely bids by a Registered Provider and reflect evidence of sales values for affordable stock. The EVA adopts 45% of market value for Affordable Rent and 70% of market value for Affordable Home Ownership. No evidence is provided to support the proposed affordable housing values. It is the opinion of Turley and Peel that current offers from active Registered Providers for Affordable Home Ownership schemes would equate to 65% of the market value and a reduction in this tenure pricing is requested. 37 37

11.38 Peel request that opinions of value should be obtained from Local Registered Providers of affordable housing, with such opinions published by Keppie Massie to support the values adopted for viability testing.

11.39 Peel is concerned that the current revenue input assumptions for Affordable Home Ownership tenure units will be overstate the financial viability of development sites within the EVA viability appraisals.

Construction Costs

38 11.40 Despite being referenced within PPG as *"appropriate data"* for use in undertaking viability assessments, Keppie Massie consider that RICS BCIS construction cost data is not an appropriate basis for the assessment of construction costs for the EVA. 38

39 11.41 EVA Paragraph 5.40 states that the adopted construction costs have been prepared by Keppie Massie's own quantity surveyor (QS) and their methodology and cost assessments are contained within EVA Appendix 5. 39

11.42 The QS Report at EVA Appendix 5 states that Keppie Massie has knowledge of data from the St Helens local market through their provision of economic viability advice to the Council since 2011. Despite this, no evidence is provided of the cost data that Keppie Massie states has been compiled in St Helens.

11.43 It is stated within the EVA that due to confidentiality issues, no detailed or summary information is provided to support the costs which are adopted. Such information is regarded as highly pertinent and necessary to support the adopted cost.

11.44 With no data source evidence provided, the adopted costs are regarded as inappropriate and non-compliant with PPG requirements. EVA Paragraph 2.9 states that *"our construction cost database is considered to provide a more reliable and transparent source of local build cost data* [than BCIS] *for St Helens"*. Rather than being transparent, the cost assessment adopts a 'black box' approach, which is regarded as highly inappropriate. It does not represent appropriate available evidence. 39 39

11.45 EVA Appendix 5 offers very little clarity in respect of the generic construction costs, in particular. Whilst costing methodology is provided, no figures are provided to explain the rates adopted for base construction costs, preliminaries, external works or garages.

PO3769

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

36 within their testing. Peel request that evidence of Keppie Massie's experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites. 36

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Construction Costs

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11.43 It is stated within the EVA that due to confidentiality issues, no detailed or summary information is provided to support the costs which are adopted. Such information is regarded as highly pertinent and necessary to support the adopted cost.

11.44 With no data source evidence provided, the adopted costs are regarded as inappropriate and non-compliant with PPG requirements. EVA Paragraph 2.9 states that *"our construction cost database is considered to provide a more reliable and transparent source of local build cost data* [than BCIS] *for St Helens"*. Rather than being transparent, the cost assessment adopts a 'black box' approach, which is regarded as highly inappropriate. It does not represent appropriate available evidence. 39 39

11.45 EVA Appendix 5 offers very little clarity in respect of the generic construction costs, in particular. Whilst costing methodology is provided, no figures are provided to explain the rates adopted for base construction costs, preliminaries, external works or garages.

PO3770

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

Think of the environment, please do not print unnecessarily
This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

36 within their testing. Peel request that evidence of Keppie Massie's experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites. 36

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11.44 With no data source evidence provided, the adopted costs are regarded as inappropriate and non-compliant with PPG requirements. EVA Paragraph 2.9 states that *"our construction cost database is considered to provide a more reliable and transparent source of local build cost data* [than BCIS] *for St Helens"*. Rather than being transparent, the cost assessment adopts a 'black box' approach, which is regarded as highly inappropriate. It does not represent appropriate available evidence. 39 39

11.45 EVA Appendix 5 offers very little clarity in respect of the generic construction costs, in particular. Whilst costing methodology is provided, no figures are provided to explain the rates adopted for base construction costs, preliminaries, external works or garages.

PO3771

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

Think of the environment, please do not print unnecessarily
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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account.Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

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From: Andrew Bickerdike
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Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

36 within their testing. Peel request that evidence of Keppie Massie's experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites. 36

11.37 In respect of Affordable Housing, EVA Paragraph 5.38 states that the values adopted are based on the likely bids by a Registered Provider and reflect evidence of sales values for affordable stock. The EVA adopts 45% of market value for Affordable Rent and 70% of market value for Affordable Home Ownership. No evidence is provided to support the proposed affordable housing values. It is the opinion of Turley and Peel that current offers from active Registered Providers for Affordable Home Ownership schemes would equate to 65% of the market value and a reduction in this tenure pricing is requested. 37 37

11.38 Peel request that opinions of value should be obtained from Local Registered Providers of affordable housing, with such opinions published by Keppie Massie to support the values adopted for viability testing.

11.39 Peel is concerned that the current revenue input assumptions for Affordable Home Ownership tenure units will be overstate the financial viability of development sites within the EVA viability appraisals.

Construction Costs

38 11.40 Despite being referenced within PPG as *"appropriate data"* for use in undertaking viability assessments, Keppie Massie consider that RICS BCIS construction cost data is not an appropriate basis for the assessment of construction costs for the EVA. 38

39 11.41 EVA Paragraph 5.40 states that the adopted construction costs have been prepared by Keppie Massie's own quantity surveyor (QS) and their methodology and cost assessments are contained within EVA Appendix 5. 39

11.42 The QS Report at EVA Appendix 5 states that Keppie Massie has knowledge of data from the St Helens local market through their provision of economic viability advice to the Council since 2011. Despite this, no evidence is provided of the cost data that Keppie Massie states has been compiled in St Helens.

11.43 It is stated within the EVA that due to confidentiality issues, no detailed or summary information is provided to support the costs which are adopted. Such information is regarded as highly pertinent and necessary to support the adopted cost.

11.44 With no data source evidence provided, the adopted costs are regarded as inappropriate and non-compliant with PPG requirements. EVA Paragraph 2.9 states that *"our construction cost database is considered to provide a more reliable and transparent source of local build cost data* [than BCIS] *for St Helens"*. Rather than being transparent, the cost assessment adopts a 'black box' approach, which is regarded as highly inappropriate. It does not represent appropriate available evidence. 39 39

11.45 EVA Appendix 5 offers very little clarity in respect of the generic construction costs, in particular. Whilst costing methodology is provided, no figures are provided to explain the rates adopted for base construction costs, preliminaries, external works or garages.

39

Only total costs for all costs including professional fees and contingency are provided at Appendix B of EVA Appendix 5. It is not possible to determine the level of construction costs, preliminaries, external works or garage costs. 39

11.46 The information is effectively provided on a 'black box' basis, offering no transparency. As a result, the EVA does not comply with PPG for Viability, which at paragraphs 8 and 10 states that transparency is required in respect of viability appraisal assumptions. A revised QS report is requested, to provide the necessary transparent detail to enable appropriate stakeholder review and engagement.

11.47 In contrast to the generic sites, the specific allocations are assessed in some detail within Appendix D of EVA Appendix 5. It is not clear why detailed assessments have been provided for site allocations but not generic sites.

11.48 On reviewing the site allocation costings, it appears that the base construction costs (substructures and superstructures) run at variable rates, with lower costs applied to larger schemes. The adopted costs are regarded by Peel as extremely low and insufficient to reflect the costs incurred by national housebuilders in the construction of standard unit types.

11.49 For example, base costs plus preliminaries for the 2,988 unit Bold Forest Garden Suburb equates to £72.27 psf whilst the 569 unit former St Theresa's Social Club costs equate to £76.72 psf.

11.50 Peel is of the opinion that the adopted site allocation construction costs are unachievable and unevidenced. It is not surprising that Keppie Massie determine that BCIS data has limitations, as the costs adopted by Keppie Massie fall very significantly below BCIS median and lower quartile levels, which are currently presented at levels for "Estate Housing Generally" at £1,190 psm (£110.55 psf) and £1,052 psm (£97.73 psf) respectively. Based on their ongoing engagement with national housebuilders, Peel regards the absolute minimum base construction costs plus preliminaries to require £90.00 psf. Schemes will be undeliverable at costs below this level in current market conditions. 39

11.51 The reduction in costs adopted for larger schemes is not evidenced, and does not reflect market conditions. A scheme of circa 3,000 units is likely to be built by a member of national housebuilders (unlikely to exceed four) whereas smaller schemes of 200+ units will also be built by national housebuilders. Each national housebuilder will achieve ongoing economies of scale through standardisation of produce and bulk buying, yet there is no reason why the largest schemes will generate further cost savings. 39

11.52 EVA Table 5.4 defines the Generic Greenfield Testing – Site Opening Up Costs with a range from £3,000 - £8,300 per dwelling dependent upon the scale of the scheme. No evidence is provided to support the adopted costs, which is inadequate. Supporting justification and evidence must be provided.

11.53 In respect of abnormal costs, unstated allowances appear to have been made within the EVA in respect of brownfield generic sites. The lack of transparency is

39 39

inappropriate and detailed information in respect of adopted abnormal costs are requested.

11.54 Peel request that further reasoning and methodology should be provided in respect of previously developed and greenfield site abnormal costs to ensure that the viability appraisals are carried out on a reasonable and equitable basis for all sites.

11.55 A S106 contribution of £1,000 per dwelling is referred to in EVA Paragraph 5.54. As noted earlier in this representation, there is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous developments should be provided by the Council to corroborate the level of S106 contribution.

40 40

Developer's Profit and Overhead

11.56 Profit level is set out within EVA Paragraph 5.68 as equating to 17.5% of GDV applied to smaller housing schemes of 10 or less dwellings. For scheme assessments which include no on-site affordable housing, Peel regards the proposed level as low, overstating viability in comparison with the widely accepted minimum industry profit level of 20% of GDV.

11.57 EVA Paragraph 5.76 states that, in the context of most forms of commercial development, the developer will typically seek a profit requirement of approximately 15% on cost. This figure was applied to all forms of non-residential development for testing and is regarded as insufficient, falling below the widely accepted commercial profit requirement equating to 20% on cost.

31 31

Viability Testing Results

Residential

11.58 EVA Tables 6.1-6.18 summarise the outputs of the viability appraisals for the generic typology schemes. The results of the site specific allocations are displayed in EVA Table 6.19 and at EVA Appendix 6. The commercial results are summarised within EVA Table 6.20.

11.59 Development in the lowest value area (Zone 1), which contains a nil affordable housing requirement for both brownfield and greenfield sites, is characterised as generally unviable on brownfield sites at all tested densities, and only demonstrating positive viability on greenfield sites at densities of 35 dph and above. A significant volume of the PSLP's identified development land supply (2,321 units) is proposed to be delivered in Zone 1 locations, and such delivery must be regarded as unviable on the basis of the Council's own EVA evidence base, indicating that the Council's housing requirement is unachievable.

11.60 Development on brownfield sites within the generic testing typologies begins to demonstrate positive viability within Zone 2 at a minimum density of 35 dph (and above). Similarly, Greenfield development only generally begins to become viable within Zone 2 at a minimum density of 35 dph. Only the smallest greenfield developments within Zone 2, at 10 dwellings or less, demonstrate positive viability at 30 dph.

PO3772

St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:15
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike[redacted]>
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

4 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf

Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf

Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:16
Cc:
[redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [redacted]

1 Attachment

Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk
Cc: Richard Knight [redacted]
Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [redacted] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:17
Cc:
"Richard Knight [redacted]
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: "Richard Knight [redacted]

1 Attachment

Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 March 2019 16:16
To: planningpolicy@sthelens.gov.uk
Cc: [redacted]
Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike
Sent: 13 March 2019 16:15
To: planningpolicy@sthelens.gov.uk

Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:55
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments

Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf

Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 15:56
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments

Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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---

From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings
Andrew Bickerdike
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:57
Hide Details
From: Andrew Bickerdike [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley
1 New York Street
Manchester M1 4HD
[redacted]

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From: Andrew Bickerdike
Sent: 13 May 2019 15:56
To: planningpolicy@sthelens.gov.uk
Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

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Appendices to Paper 1 will follow under separate cover.

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Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01·41
Policies:
LPA04, 05, 06
Sites 1ES, 2ES
GBP-036, GBP-055a
SA, Green Belt Review
SHLAA & EVA

13 May 2019

Delivered via email

[redacted]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [redacted]

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

Registered in England Turley Associates Limited no. 2235387. Registered office: 1 New York Street, Manchester, M1 4HD

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North

2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South

3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site[1] for employment uses and the (majority of) the Haydock Green site[2] for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

[1] Policy LPA04; Ref EA4
[2] Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely

Andrew Bickerdike
Director

EL0228/2540
EVA

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

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

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

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

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.
See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary
See section 11 of Paper 1

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:
Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM

EL0228/01-12
EL0228/18-20
EL0228/23-41
(EL0228/13-17 & 21-22
in Papers 2 and 3)

Policies LPA 04, 05, 06,
Sites 1ES, 2ES
GBP_036, GBP_053
SA, Green Belt Review, SHLAA & EVA

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Local Plan
Economic Viability
Assessment
25-40

11. Viability Assessment

11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.

11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.

11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)[46], which at paragraph 31 states:

"...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.

11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.

11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

[46] Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

39 39

inappropriate and detailed information in respect of adopted abnormal costs are requested.

11.54 Peel request that further reasoning and methodology should be provided in respect of previously developed and greenfield site abnormal costs to ensure that the viability appraisals are carried out on a reasonable and equitable basis for all sites.

11.55 A S106 contribution of £1,000 per dwelling is referred to in EVA Paragraph 5.54. As noted earlier in this representation, there is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous developments should be provided by the Council to corroborate the level of S106 contribution.

40 40

Developer's Profit and Overhead

11.56 Profit level is set out within EVA Paragraph 5.68 as equating to 17.5% of GDV applied to smaller housing schemes of 10 or less dwellings. For scheme assessments which include no on-site affordable housing, Peel regards the proposed level as low, overstating viability in comparison with the widely accepted minimum industry profit level of 20% of GDV.

11.57 EVA Paragraph 5.76 states that, in the context of most forms of commercial development, the developer will typically seek a profit requirement of approximately 15% on cost. This figure was applied to all forms of non-residential development for testing and is regarded as insufficient, falling below the widely accepted commercial profit requirement equating to 20% on cost.

31 31

Viability Testing Results

Residential

11.58 EVA Tables 6.1-6.18 summarise the outputs of the viability appraisals for the generic typology schemes. The results of the site specific allocations are displayed in EVA Table 6.19 and at EVA Appendix 6. The commercial results are summarised within EVA Table 6.20.

11.59 Development in the lowest value area (Zone 1), which contains a nil affordable housing requirement for both brownfield and greenfield sites, is characterised as generally unviable on brownfield sites at all tested densities, and only demonstrating positive viability on greenfield sites at densities of 35 dph and above. A significant volume of the PSLP's identified development land supply (2,321 units) is proposed to be delivered in Zone 1 locations, and such delivery must be regarded as unviable on the basis of the Council's own EVA evidence base, indicating that the Council's housing requirement is unachievable.

11.60 Development on brownfield sites within the generic testing typologies begins to demonstrate positive viability within Zone 2 at a minimum density of 35 dph (and above). Similarly, Greenfield development only generally begins to become viable within Zone 2 at a minimum density of 35 dph. Only the smallest greenfield developments within Zone 2, at 10 dwellings or less, demonstrate positive viability at 30 dph.

11.61 Within Zone 3, all sites (brownfield and greenfield) demonstrate positive viability at 30pdh and above, except for one brownfield scheme of 25 dwellings, with a marginally negative viability. The EVA determines that Brownfield sites can viably accommodate 10% affordable housing, with greenfield site at 30% affordable housing.

31 11.62 From the EVA Tables 6.1-6.18 it is clear that there is a differential between the results of the greenfield and brownfield appraisals, albeit the general assumptions are unchanged between the two categories of assessment. 31

11.63 This is regarded as inappropriate, with no support from Peel's experience in land transactions and market expectations.

11.64 Appropriate revisions to the greenfield land values will reduce the reported levels of viability.

11.65 Revisions to base construction costs applied in the EVA and clarity in respect of all wider cost inputs are required. Again, the results of site viability within the EVA will be reduced following the adoption of realistic and evidenced costs.

Non-Residential

11.66 EVA Table 6.20 (Commercial Viability Testing Results – Generic Typologies) presents negative viability results for Offices (Out of Town) (-£580 to -£734); Industrial B1/B2/B8 (-£19 to -£453); Retail (Comparison) (-£4 to -£68); and Hotel (-£348). 40 40

11.67 The only positive surpluses were established for Retail (Convenience) (£95 to £465) and an Industrial (B8) development of larger scale, demonstrating a £17 surplus.

11.68 The viability testing for commercial developments presents mixed results. The EVA states that development is unlikely to come forward on a speculative basis.

11.69 However, it is Peel's opinion that the current adopted profit (15% of costs). The EVA proposes that schemes will come forward solely where owner occupier driven, but this is not regarded as an appropriate basis to assess the overall level of achievable commercial delivery within the PSLP.

Next Steps

11.70 Peel requests that the matters raised within this representation, in respect of the EVA, are addressed by Keppie Massie in their role as independent advisors to the Council. Updated evidence, in the form of an EVA addendum or update, should be published for formal stakeholder review and comment in advance of the Examination of the PSLP.

11.71 Critical to the success of producing this EVA addendum will be a further, meaningful process of industry engagement. Specifically, in accordance with PPG, it is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify stated concerns by effectively establishing and seeking to agree appropriate inputs into the EVA. Engagement to date has been insufficient to address the outstanding issues raised.

PO3773

Site 4HS
① GBR (2016) & LPA04
② LPA05

{In Archive} St Helens Borough Council Local Plan
Christopher Foy
to:
planningpolicy
17/02/2019 10:22

[redacted]

1 Attachment

Assessment of the Local Plan and Green Belt Review-updated-v2.pdf

Dear Sir / Madam,

Please find attached an updated version of a report on behalf of the residents of French Fields Crescent, originally dated January 2017.

Chris

[redacted]

Updated – version 2

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of 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.

LPPO STAGE 1

2. Draft Green Belt Review (GBR) 2016: PREVIOUS GBR

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The GBR scored each parcel against the Level of Significance of its Green Belt function <u>for purposes 1, 2 and 3 only</u> at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are "... *not necessarily inappropriate or irrelevant*" (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

GBR 2016 ① IEA & IES?

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

4HA

<u>Confusing and inaccurate identification:</u>

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).

GBR 2016 ①

2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

GBR 2016 ①

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, thus giving rise to it **remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

ALL POINTS BASED ON A SUPERSEDED DOCUMENT

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

AS ABOVE

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

AS ABOVE

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

4HA (LPA05) ②

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has

DATA HAS SINCE BEEN UPDATED

PO3774

(1) GEN (4) LPA05 SITE 4HA PF0920
(2) GEN (5) GBR
(3) LPA02

Ref: LPSD

(For official use only)

St.Helens Council

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

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This form has two parts;

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

13 MAY 2019

1000

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: BOLD + CLOCK FACE ACTION GROUP
First Name: SUSAN	First name:
Last Name: DAVEY	Last Name:
Organisation/company: BOLD + CLOCK FACE ACTION GROUP	Organisation/company:
Address: 12 FRENCHFIELD CRES CLOCK FACE ST HELENS	Address:
Postcode: WA9 4FZ	Postcode:
Tel No: [redacted]	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signature: [redacted] Date: 11/3/19

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

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

☒ Yes (via email) ☐ No

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

RETURN DETAILS

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Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

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

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

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3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e					

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

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public. (1)

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There (2)

should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

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(3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA 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. 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.

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Yet,

(1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
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   b. SA2. To protect and improve land quality in St Helens

(2) The Priority species of Grassland Assemblage – Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**

(3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

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

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans ~~as~~ to ensure the best effort is made to engage with the community to develop a sustainable plan that meets the needs of the local community.

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.

PO3775

SITE 4HA PF1273

① GEN ③ LPA02 ⑤ GBR
② GEN ④ LPA05

Ref: LPSD

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13 MAY 2019

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Title: MR	Title: BOLD + CLOCK FACE ACTION
First Name: BRIAN	First name: GROUP
Last Name: DAVEY	Last Name:
Organisation/company: BOLD + CLOCK FACE ACTION GROUP	Organisation/company:
Address: 12 FRENCHFIELD CRES CLOCK FACE ST HELENS	Address:
Postcode: WA9 4FZ	Postcode:
Tel No: [redacted]	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	

Signature [redacted] Date: 11/3/19

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Please tick as appropriate

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Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north. (5)

Please continue on a separate sheet if necessary

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

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans ~~as~~ to ensure the best effort ~~made~~ is made to engage with the community to develop a sustainable plan that meets the needs of the local community.

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

***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.

PO3776

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)

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: MR	Title:
First Name: TREVOR	First name:
Last Name: HUTCHINSON	Last Name:
Organisation/company:	Organisation/company:
Address: 21 NEWS LANE RAINFORD	Address:
Postcode: WA11 7LA	Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] Date:

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

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

☐ Yes (via email) ☐ No

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

[1] view at http:/www.legislation.gov.uk/ukpga/2004/5/contents

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St Helens** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception St.Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)
or by email to:	planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	☐ Yes	☐ No
Sound?	☐ Yes	☑ No
Complies with the Duty to Cooperate	☐ Yes	☐ No

Please tick as appropriate

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

Positively Prepared?	☐
Justified?	☑
Effective?	☑
Consistent with National Policy?	☐

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

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

ROAD ACCESS NOT ADEQUATE FOR VOLUME AND SIZE OF VEHICLES.

WATER SUPPLY IN AREA NOT ADEQUATE

MAIN SEWER FEED FROM HOUSES RUNS UNDER AC11 AND IS ONLY 75mm BORE AND NOT STANDARD 100mm

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.

STOP THE RAT RUN AND LARGE LORRIES

1ST TO LOOSE WATER LAST TO REGAIN IT

IMPROVE SEWER TO STANDARD

Please continue on a separate sheet if necessary

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

NOT NECESSARY BUT WILL IF REQ

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.

AC11

FIVE HEAD ON CRASHES

News lane - Bushy lane -Ferry Knoll and Nipe lane the area has approximately 400 houses

There are no zebra crossing points, no traffic calming measures yet the road speed ranges from 30 mph to 50 mph,

In excess of **1000 vehicles a day** travel down News lane and Bushy lane onto Ferry knoll and Nlipe lane, a single file road with passing places.

Its commonly known as the rat run it serves as a short cut to the industrial area of Skelmersdale from 5-30 am until late at night.

Ferry knoll and Nipe lane are restricted 6 foot access only roads but this does not stop all sizes of vehicles using them without the need for access.

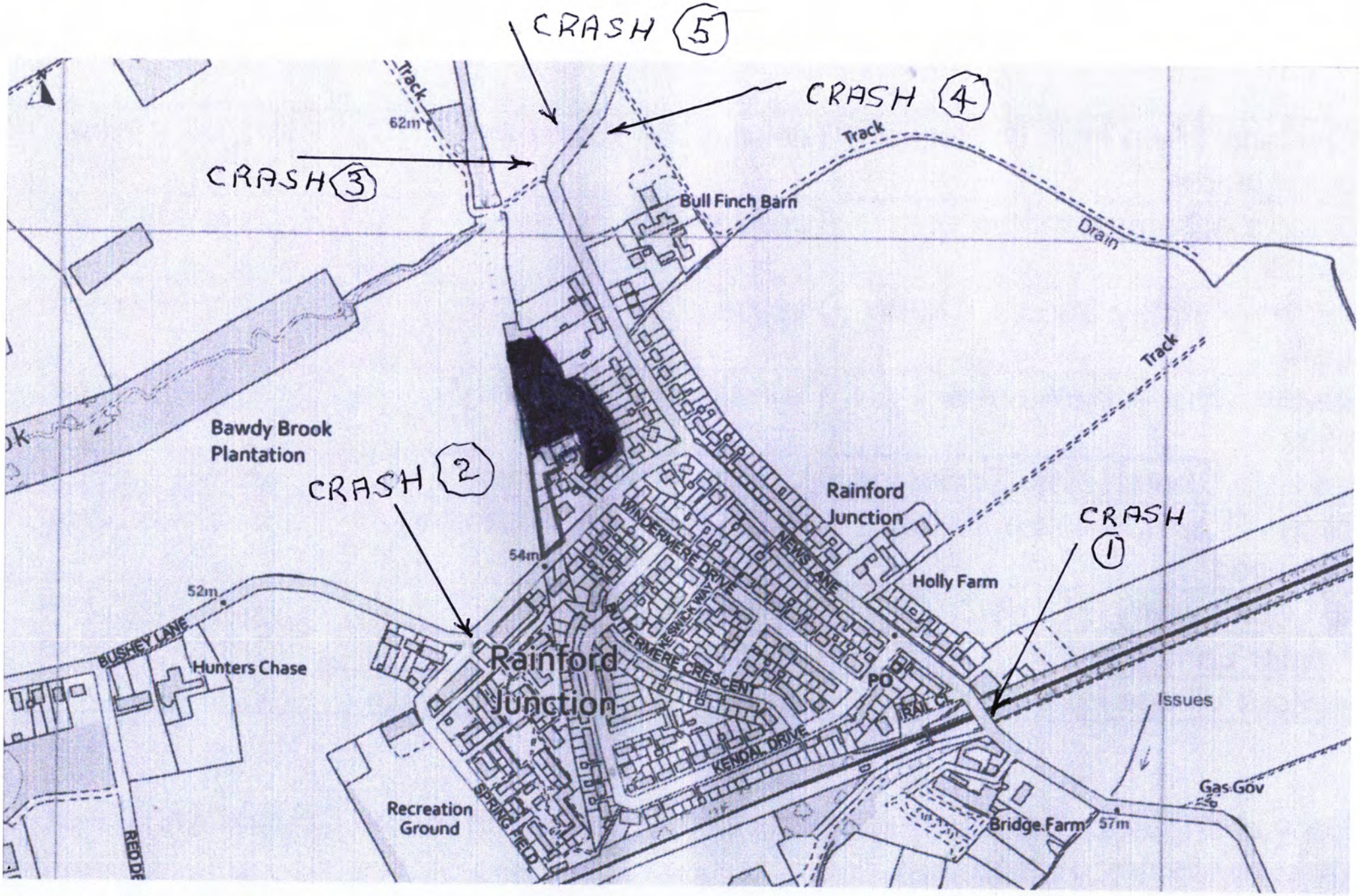
The number of **12 wheel lorries** is a nightmare for pedestrians and other road users.

They are to long to negotiate the tight bends and junctions of the area and **commonly cross the central white lines and pavements** forcing car drivers to take avoiding action and even worse **pedestrians fearing for there lives** while walking on the pavement .

There have been five head on vehicle crashes within five hundred yards of the junction of News and Bushy lane, I know of no other small area with this accident level that **is not classed as an accident black spot** and measures taken to prevent the carnage.

How long before somebody is killed? is that what we are waiting for?

I sincerely hope its not on your watch!



AC 11 AREA IN BLACK DO NOT ADD TO THE CARNAGE

5 HEAD ON VEHICLE CRASHES

BUSHEY LANE

DCA AUTOMOTIVE

CONTINENTAL
CARGO CARRIERS

Man suffers neck injury in crash on Ferny Knoll Road, Rainford

By Simon Mulligan | @SimonJMulligan

PO3777

St.Helens Council

279

Ref: LPSD

04 MAR 2019

(For official use only)

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

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Part 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: TERENCE	First name:
Last Name: WITTER	Last Name:
Organisation/company:	Organisation/company:
[redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [redacted] **Date:** 25.02.19.

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.

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

My objection is simple really, I think the Council wants to take the school (St. Augustine's) out of the green belt and then close the school and merge it with another school. The land can then be sold to a developer to build houses and with houses come increased cars/traffic. There are already cars coming off a new estate in Boardmans Lane, and coming down Park Road. The traffic has also been increased by the Lidl supermarket and all this traffic merges onto Blackbook Road and causes delays. Anything that caused an increase to this volume of traffic would be a nightmare.

Please continue on a separate sheet if necessary

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As stated in (6).

Please continue on a separate sheet if necessary

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

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

PO3778

PF0697

① LPA05 ③ GEN 161
② LPA04 ④ Green Belt Review 2018

13 MAR 2019

Ref: LPSD

(For official use only)

St.Helens Council

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

1. Your Details
(we will correspond via your agent)

Title: MRS
First Name: KERRY
Last Name: COOPER
Organisation/company:

Address: 421, CLOCKFACE ROAD
CLOCKFACE, ST HELENS
MERSEYSIDE
Postcode: WA9 4QL

[redacted]

2. Your Agent's Details (if applicable)

Title:
First name:
Last Name:
Organisation/company:

Address:

Postcode:
Tel No:
Mobile No:
Email:

Signature: [redacted] Date: 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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post to:

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

or by hand delivery to:

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St.Helens Town Hall
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3. To which part of the Local Plan does this representation relate?

Policy	✓ LP902 03 8 05	Paragraph/ diagram table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
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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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AS PER THE SUPPORTING DOCUMENT

Please continue on a separate sheet if necessary

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Please keep a copy for future reference.

Statement 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 on behalf of Bold and Clock Face Action Group.

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

Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community involvement is the golden thread running throughout the National Planning Policy Framework 2019.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below (taken from St Helen's SCI 2013 pages 7 and 13 respectively). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document (DPD)' (Reg.18) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks (Reg. 19). The majority of constituents that live within the

exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs'*. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the Green Belt. They believed this would have a negative impact on the individuals health and well-being.

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Councils own Green Belt Review,the land cannot be justified in removal from the Green Belt. These reasons include:

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
    - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
    - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
    - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

1

The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from Green Belt can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at *'setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment'* (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental

PO3779

PF0698

① LPA05 ③ - GEN 762
② LPA04 ④ - Green Belt Review 2018

13 MAR 2019

Ref: LPSD

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St.Helens Council

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

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

This form has two parts;

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

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	**2. Your Agent's Details (if applicable)**
Title: MR	Title:
First Name: PAUL	First name:
Last Name: COOPER	Last Name:
Organisation/company:	Organisation/company:
Address: 421 CLOCK FACE ROAD	Address:
CLOCK FACE	
ST HELENS	
Postcode: WA9 4QL	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

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

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St Helens** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception St.Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)
or by email to:	planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	✓ LPA02, 03 & 05	Paragraph/ diagram table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	☐ Yes	☑ No
Sound?	☐ Yes	☑ No
Complies with the Duty to Cooperate	☐ Yes	☑ No

Please tick as appropriate

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

Positively Prepared?	☑
Justified?	☑
Effective?	☐
Consistent with National Policy?	☑

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

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

As Per the supporting document

Please continue on a separate sheet if necessary

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

As per the supporting document-

Please continue on a separate sheet if necessary

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

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

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

✓	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.

Statement 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 on behalf of Bold and Clock Face Action Group.

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

Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below (taken from St Helen's SCI 2013 pages 7 and 13 respectively). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document (DPD)' (Reg.18) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks (Reg. 19). The majority of constituents that live within the

exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs'*. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

1

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

2

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the Green Belt. They believed this would have a negative impact on the individuals health and well-being.

1

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Councils own Green Belt Review,the land cannot be justified in removal from the Green Belt. These reasons include:

4

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
    - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
    - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
    - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from Green Belt can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at *'setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment'* (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental

PO3780

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)

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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 LPA02: Spatial Strategy.

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 LPA02: Spatial Strategy

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA02 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 Submission Draft St Helens Local Plan 2020 – 2035, proposes significant developments at 4HA and 5HA which are all contained within the Bold Forest Park boundary. Across the three sites there are 3,557 dwellings planned, with the most significant being at 4HA in Clock Face Village, 2,988 dwellings. The development plans propose the removal of 154.53ha Green Belt land, for housing, from the Forest Park area, which constitutes over 55% of the planned housing development within the local plan. Together with the land currently planned for Employment development, this will see an overall reduction of 12% of the Greenbelt Land within the Bold Forest Park area. *'The environmental quality of the area is of fundamental importance to the success of the Forest Park.'*[2] Erosion of the Green Belt land to such an extent within the Forest park boundary, far more than other areas within the borough, will threaten the environmental quality of the area and will potentially lead to the failure of the aims and objectives of the forest park.

The Green Belt Review 2018 used to assess the land for development allocation, is fundamentally flawed in its assessment of site 4HA (known as GBP_074_A, GBP_074_B,

[1] St Helens Council Local Development Scheme 2018-2021, Section 2.1
[2] Bold Forest Area Action Plan, Adopted 2017, Page 7, 3.2.9

GBP_074_C, GBP_074_D). The review was split in to 5 stages with each parcel of land being assessed and rated at each stage and then either being carried forward or discounted.

Stage 1 of the GBR, assessed each parcel of land against the purposes of the Green Belt. Table 2.1 defined the criteria used for defining 'strong' and 'less strong' boundary features against purpose 1.

Table 2.1: Criteria used to define boundaries of parcels and sub-parcels.[3]

Strong' boundary features	'Less strong' boundary features
• Canals and substantial rivers • Protected woodlands (greater than 20m in width) • Bunds and depressions greater than 5m in height/depth • Permanent roads • Railway lines • Buildings with strong established lines (excluding buildings that are not appropriate in the Green Belt such as agricultural buildings and, some facilities for outdoor recreation) • Policy designations or planning commitments that are likely to lead to a firm boundary being created.	• Hedgerows, lines of trees • Farmers' fields • Ditches and drains not readily visible from ground level • Fences and low walls • Tracks and temporary roads • Buildings with weak intermittent lines

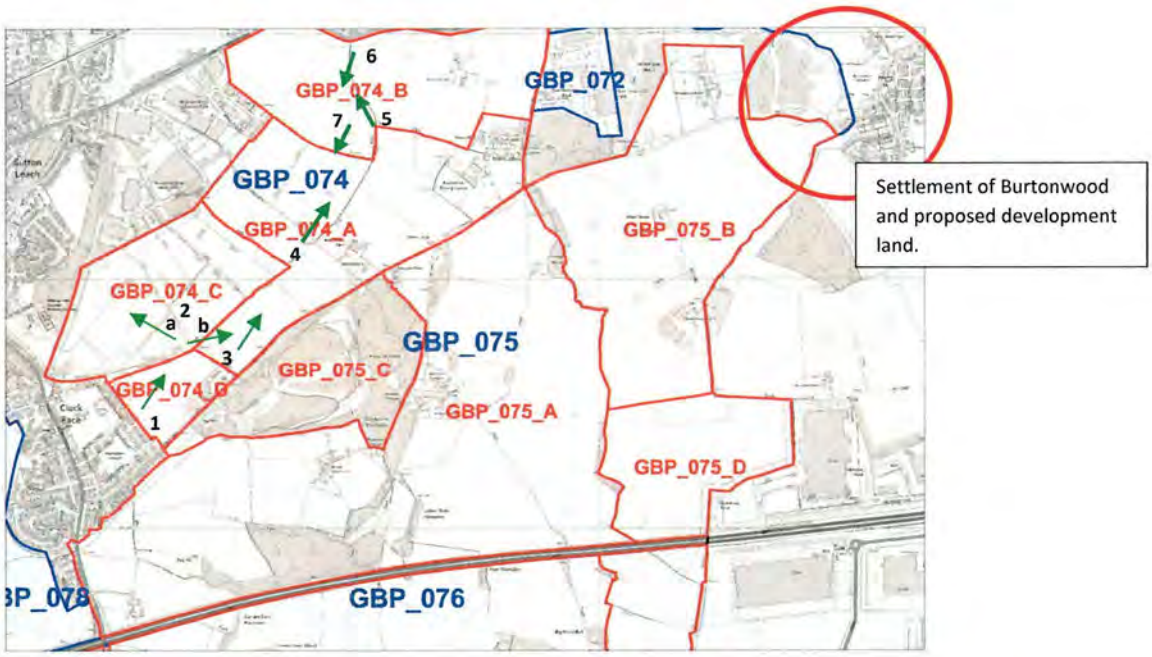
In all four sub-parcels, Farmers fields, Hedgerows and lines of trees have been described as 'substantial' or 'strong' boundaries. This is a direct error when assessed against the criteria as detailed in the GBR. Assessed correctly using the criteria laid out in table 2.1 the sub-parcels become High.

In respect of purpose 2, the GBR did not consider the settlement of Burtonwood in Warrington Borough on the east aspect of 4HA. Whilst not a 'town' as referred to in the NPPF, it is a smaller settlement of the same scale and character as Rainhill, Rainford, Billinge and Garswood that have been considered in the review. It is a community with its own identity, *character and range of community facilities.*[4] The Group argue this exclusion is a fundamental error in the assessment of 4HA against purpose 2. Including Burtonwood in the assessment would re-score each parcel within 4HA as High, being on the urban edge within a 'strategic gap' i.e an essential gap that needs to be kept open and kept clear of new development to ensure that adjacent

[3] Green Belt Review December 2018, Page 13-14
[4] GBR 2018 Page 18

settlements do not merge.[5] This is given even more significance when considered against strategic land and development projects planned for Burtonwood, which will also encroach in to the gap. Please see attached.

The Group argue the findings against purpose 3 are also inaccurate. Again, the review refers to 'strong' boundaries at sub-parcels GBP_074_C and GBP_074_D, which have been shown to be listed as weak under the GBR categories. The recognised strong boundaries that are present within the sub-parcels serve to prevent urban sprawl. GBP_074_A references urban development on its western boundary. The western boundary borders GBP_074_C and GBP_074_D, farm fields, not urban development. The review has listed each parcel as having limited open views. This is incorrect. Please see below photographs taken from points on Public Rights of Way for each sub-parcel and corresponding reference on the map. These clearly show the open views and inaccuracies in the assessments.



1. Boundary GBP_074_D

2a. Boundary GBP_074_D and GBP_074_C

[5] GBR 2018 Page 19

2b. Boundary GBP_074_C and GBP_074_A

3. Boundary GBP_074_D and GBP_074_A

4. GBP_074_C and GBP_074_A towards GBP_074_B

5. Boundary GBP_074_A and GBP_074_B

6. Boundary GBP_074_B

7. From GBP_074_B towards GBP_074_A

Taking the three purposes together and correcting the inaccuracies, sub-parcels GBP_074_A, GBP_074_B, GBP_074_C and GBP_074_D are scored as High+ and as such should be excluded for consideration at stage 1.

If the inaccuracies at stage 1 are ignored and the sub-parcels are carried through to stage 2A, The Group argue they are subject to a 'prohibitive' constraint which would result in them being discounted for the next stage. Table 2.6: List of 'prohibitive' constraints applied to

parcels/sub-parcels in Stage 2A[6], listed the constraints that should be considered for exclusion. Constraint 4 is described as:

'More than 2/3rds of the parcel/sub-parcel is covered by an area of public open space, sporting or recreational provision in an area of deficit for facilities of the type which would be lost, and there is no identified scope for suitable replacement provision.'[7]

Areas GBP_074 collectively, all fall within the Bold Forest Park boundary. The area is criss-crossed by heavily used Public Rights of Way and a recognised bridleway. It has also been identified for further development of the bridleway network. This issue is discussed further under Policy LPC05, where The Group have identified the area as being an open space of public value, used for recreational purposes and forms part of the Forest Park. Area GBR_074 collectively should have been discounted at this stage.

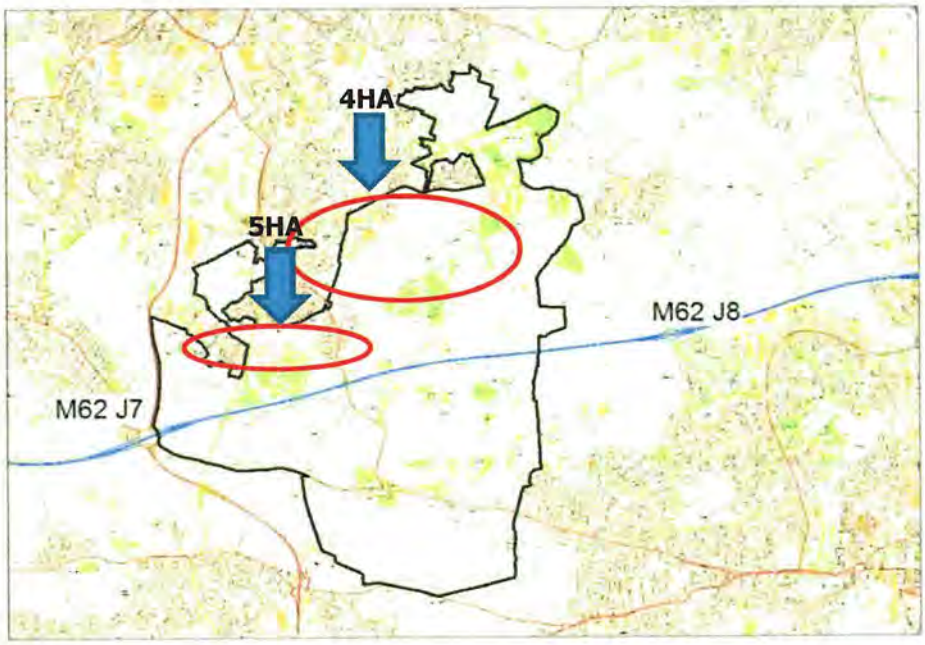
If this was again ignored and the parcels were put forward for assessment at Stage 2B, the Bold Forest Park Area Action Plan should have been a key consideration and data source when considering the characteristics of each parcel/sub-parcel against the constraints listed within the Stage 2b development assessment proforma, please see attached. This applies to both sites GBR_074 and GBR_080. This is not the case. The Action Plan has not been listed as a data source against any constraint type. This is a fundamental error in the GBR 2018.

As a result, the recommendations of the GBR 2018 must be discounted in relation to sites GBR_074 and GBR_080, therefore the Council have failed to demonstrate the exceptional circumstances required to remove parcels GBR_074 collectively (4HA) and GBR_080 (5HA) from the Green Belt.

Much of the Green Belt land within the Forest Park that has been allocated within the plan is in the North of the Forest Park and therefore currently the most accessible to many people within the Bold area and neighbouring wards. Removal of the land at 4HA and 5HA will mean a significant percentage of the remaining Greenbelt land is in the South of the Forest Park, an area that is the least accessible to a large majority of residents and visitors to the Park. The area is segregated by the M62, making access difficult other than by car and is privately owned, restricting the access rights of the general public. The NPPF expects the local authority to positively plan to enhance the beneficial use of the land in the Green Belt. This includes looking for opportunities to provide access to Green Belt; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.[8] The plan therefore is in direct conflict with the Bold Forest Park Area Action Plan and the vision, aims and objectives of the plan.

[6] St Helens Borough Local Plan 2020-2035 Green Belt Review 2018, Page 22
[7] St Helens Borough Local Plan 2020-2035 Green Belt Review 2018, Page 22
[8] Bold Forest Area Action Plan, Adopted 2017, Policy Context, Page 2, 2.1.6

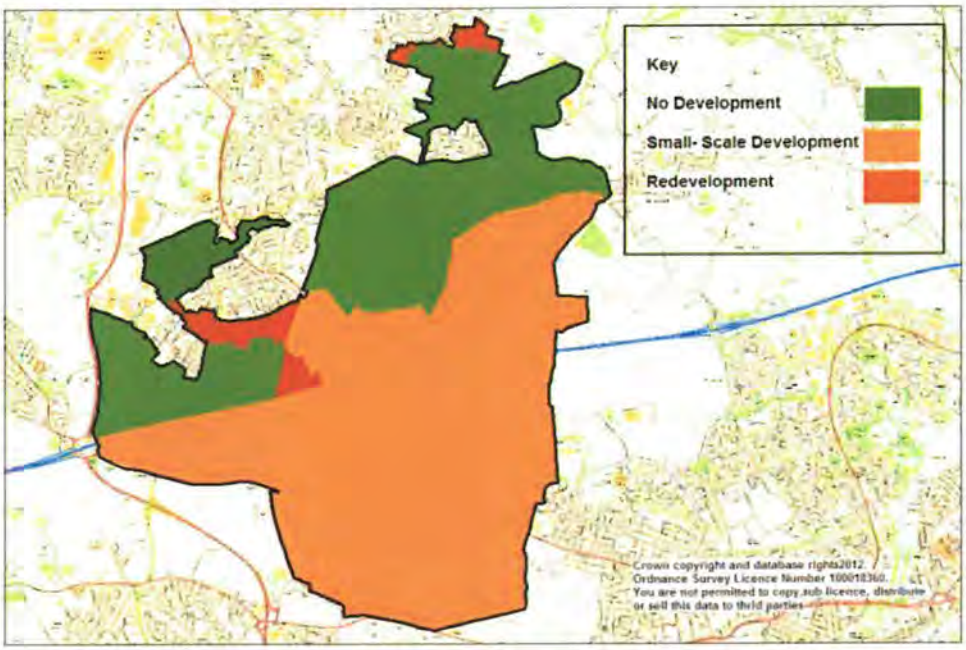
Figure 1. Bold Forest Park boundary.[9]



The BFPAAP identified the potential to '*accommodate some small-scale development*'[10], providing a, '*framework for the development of the Forest Park.*'[11]. The BFPAAP, further identified areas that should be protected from any development. St Helens Council have failed to take a balanced approach to the allocation of development land within the borough. The Green Belt Review 2018 and subsequent recommendations, should be read in conjunction with already adopted development plans. Site 4HA is covered entirely by a recommended no development area. A Landscape Character Assessment for St Helens by Land Use Consultants considered development within the character area should be avoided to maintain an open rural landscape character.[12]

[9] Bold Forest Park Area Action Plan Supporting Technical Document, Page 5
[10] Bold Forest Area Action Plan, Adopted 2017, Research and Consultation Background, Page 15, 6.4.4
[11] Bold Forest Area Action Plan, Adopted 2017, Introduction, Page 1, 1.2
[12] A Landscape Character Assessment for St Helens, Land Use Consultants, January 2006, Page 135

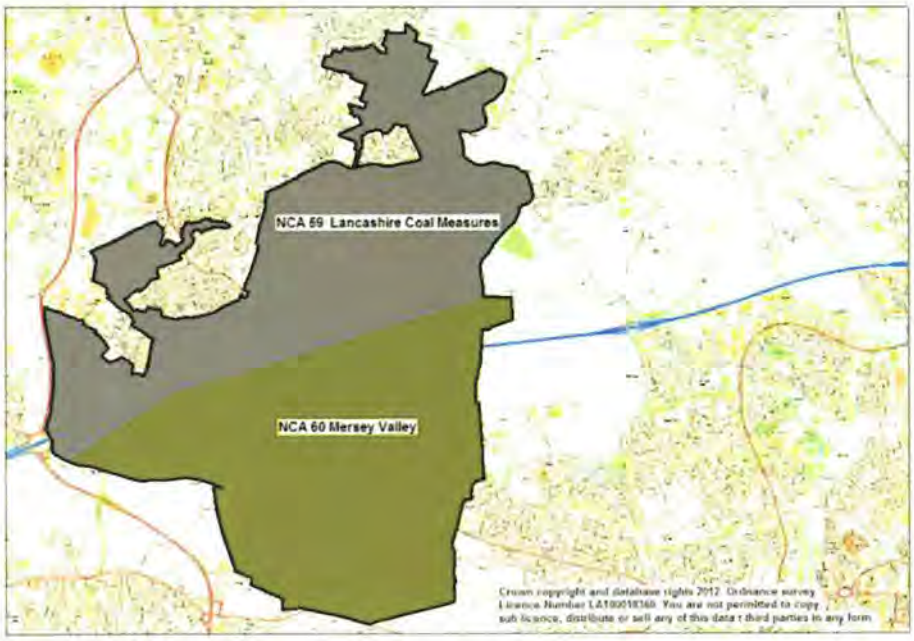
Figure 2: Potential For Development Map[13]



'A high quality environment is an essential ingredient of a successful outdoor leisure attraction. This includes a strong sense of place and local character.' Part of the landscape character of Bold Forest Park can be described as, 'urban fringe farming'. This was further supported by Natural England's National Character Area Advice for the Lancashire Coal Measures (NCA 59), which, 'identifies mining and agriculture as major influences on landscape character.' The BFPAAP accepted and listed as a key issue the recommended advice for 'supporting the agricultural landscape by expanding the habitat networks of grassland, woodland, ponds and hedges.' Site 4HA and 5HA are located entirely within the NCA 59 Lancashire Coal Measures area.

[13] Bold Forest Park Area Action Plan Supporting Technical Document, Page 15

Figure 3. National Landscape Character Areas[14]



In 2004 Groundwork St Helens conducted a feasibility study to investigate the desire for the development of a bridleway network throughout the Forest Park. Over 99% of respondents supported a bridleway development over the open spaces within the Forest Park. The largest development of which was recommended across the open space covered by site 4HA.[15] The British Horse Society (BHS) has put forward it's aspirations to develop a three day "Mersey Circular" route with adjacent stabling, suggesting the existing equestrian businesses within St Helens are particularly well placed. The route is mostly within St Helens Borough, in particular, Bold Forest Park. The Mersey branch of the BHS estimates there being 9,085 horses in Liverpool City Region and an annual expenditure of £33m[16]. The study by Groundwork suggested horse riding was as much an anchor activity in the Forest Park as walking, cycling and running and the aspirations of BHS demonstrate the success of the equestrian sector should be seen as crucial to the success of the Forest Park and fundamental to its regeneration. The **Local Plan LPA02**: Spatial strategy states that development would be prevented, 'that would adversely impact upon or jeopardise the delivery of regeneration proposals.' The BFPAAP states that any development should, 'fully contributes to the Parks aims and objectives'.[17]

The removal of 4HA from the Green Belt and allocation for development would result in the closure of the largest equestrian business within the Forest Park at Tunstalls Farm and impact

[14] Bold Forest Park Area Action Plan Supporting Technical Document, Page 10
[15] Bold Forest Park Area Action Plan, Adopted 2017, Page 18, 6.5.2
[16] Bold Forest Park Area Action Plan, Adopted 2017, Page 12, 6.1.7
[17] Bold Forest Park Area Action Plan, Adopted 2017, Page 14, 6.2.2

on a second equestrian business at Northfield Farm that will be completely enclosed by development. It will remove any open space earmarked for the development of an off-road bridleway and halt any aspirations by BHS by not only removing the option of adjacent stabling, but available land to develop a 3day route. This will adversely impact on or jeopardise the delivery of regeneration proposals and the Parks aims and Objectives.

St Helens Council Brownfield register, produced in 2018, suggests current availability for 6028 houses. Following a freedom of information request in January 2019, it is recognised there are currently 936 long term empty homes and 2,853 unused units (council Tax Returns 2018) in the borough of St Helens. Even when using St Helens Councils own figures and excluding the long term empty and unused dwellings, this leaves a shortfall of only 1,500 houses at best. Across the combined sites of 4HA and 5HA, provision is being made for over 3,500 dwellings. This far exceeds the shortfall for the borough as a whole. Sefton Council also submitted comments to St Helens Council in 2016 stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land. The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

It is commendable that St Helens council have created a Brownfield Register and have identified 108 sites and a *minimum* 6028 dwellings that could be built over the next 15 years (2018 Brownfield Register). Furthermore 74 of these sites have planning permission for 3710 homes. Taking the adopted number of dwelling required per year (486), 3710 dwellings equates to over 7 years of housing and 6028 equates to 12 years of development as a minimum. This is an excellent way to regenerate land and communities within the town that are currently purposeless. It is in line with the NPPF (2019, Section 13) approach of urban regeneration, recycling derelict and other urban land and protecting Green Belt.

Research carried out by CPRE (2018)[18] on the state of brownfield land nationally revealed councils had identified suitable land for 23% more housing since they were required to submit information on previously developed land to the National Land Use Database from 2010 to 2012. Analysis of the 2017 and 2018 brownfield registers[19] shows that within St Helens there was an increase of 10 sites and 210 dwellings (10% and 4% increases) within 1 year alone. There is also the potential of currently used sites or unsuitable/contaminated sites becoming available for development within the 15 year period. CPRE have released a Brownfield Toolkit[20] to enabling communities to highlighting brownfield sites in their local area, supporting the work of Council planning departments.

Whilst the consideration of brownfield sites within St Helens only on the Brownfield Register is in line with Government guidelines, it does exclude a wealth of sites that may be released within the next 15 years. A FOI request has shown that there is a significant amount of contaminated land that also has the potential to site considerable number of dwellings (Table 1. Attached St Helens contaminated Land Sites 2015). Although not immediately available, the least contaminated land (Group C), arguably is not financially prohibitive to consider and could reasonably be remediated within the 15 year plan. Table 4.6 of the St Helens Local Plan 7245 dwellings are required between 1st April 2020 and 31St March 2035. Assuming 6028 would be delivered from the Brownfield register, the residual number of homes (1217) would require 60.85 hectares of land (using Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017), which represents only 2% of Group C contaminated land; an amount of land that could feasibly be remediated.

Decontaminating land and regenerating comes at a cost, and whilst ground conditions can be uncertain and unexpectantly costly in previously untouched areas, it is this cost that is considered prohibitive to developers. There are incentives to attract developers to build on currently contaminated sites, such as land remediation tax relief of 150%, the £1 billion Housing Delivery Fund[21], £1.3 billion Land Assembly fund and Small Sites Fund[22]. These all stem from the Government's desire for innovation in delivery of housing and would aid development on brownfield and contaminated land.

Taking all these factors into consideration, the sustainable approach that is in line with NPPF would be to review the need to release Green Belt on a 5 year basis, releasing it only when brownfield is exhausted. To release Green Belt within the next 15 years would reduce or

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[18] Campaign to Protect Rural England (CPRE), 2018. State of Brownfield 2018, An analysis demonstrating the potential of brownfield land for housing, available at https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018 accessed on 12/5/19

[19] St Helens website – Research, Evidence and Monitoring - Brownfield Land Register available at https://www.sthelens.gov.uk/planning-building-control/planning-policy/research-evidence-and-monitoring/ accessed on 12/5/19

[20] CPRE Lancashire Brownfield Land Register Toolkit http://www.cprelancashire.org.uk/resources/housing-and-planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit accessed on 12/5/19

[21] Government News Story (2018) £1 billion housing delivery fund launched by Brokenshire in partnership with Barclays available at https://www.gov.uk/government/news/1-billion-housing-delivery-fund-launched-by-brokenshire-in-partnership-with-barclays accessed on 12/5/19

[22] Government Press Release (2018) – Government investment to overcome barriers to building available at https://www.gov.uk/government/news/government-investment-to-overcome-barriers-to-building accessed on 12/5/19

even remove incentive to regenerate brownfield first. Should the unlikely need arise to release Green Belt there should be a staged approached to its release, which is proportional to what is required on a 5 year basis. In doing so this would reduce the effects of urban sprawl, where there are already hard boundaries by existing housing, industry and roads, in line with NPPF 2019 paragraph 134.

Furthermore, dealing with contamination can improve the water environment, provide homes for wildlife, help tackle climate change, regenerate communities and protect food supplies by preserving Green Belt and reusing land already within the town. All these points are supported with Chartered Institution of Water and Environmental Management (CIWEM) 's brownfield development position statement.[23]

[23] CIWEM's Policy Position Statement on Brownfield Development available at https://www.ciwem.org/assets/pdf/Policy/Policy%20Position%20Statement/Brownfield-Development.pdf accessed on 12/5/19

St Helens Contaminated Land (CL) Sites 2015

Potential CL area (km^2) = total 9105 no. sites in the Borough		Percentage of CL in Borough (% of total - 135.9 km^2)	Part2A		Planning
			(a)Sufficient information to establish SPOSH or not SPOSH	(b) Determined under Part2A	(c)Hold sufficient information (i.e. Phase 1, Site Investigation, Remediation, Determination)
Site Category	**Total area (km^2)**		**Site No.**	**Site No.**	**Site No.**
Group A	47.9	35.2 %	3006 sites – a=b+c (sites hold numerous individual sites)	6 sites (Tickle - 34 ind. Property & Jackson 38 ind. Property determinations) [1]	3000 (on average 200 sites from 2001 – 2015 via Planning)
Group B	15.4	11.3 %			
Group C	31.7	23.3 %			
Within Group A, B &C (top 40 highest prioritised sites	4.3	3.2 %	36 sites	3 sites [2]	33 (collation of data in progress)
Potential CL = total 9105 no. sites – total 3006 no. sites hold sufficient information = 6099 no. sites					

[1] Tickle Avenue Estate, Sutton Sankey Brook, Recreation Street Allotments and Jackson Street Estate– other sites that have been investigated and not determined include Wood Street (not SPOSH), Merton Bank (Management Plan).
[2] Tickle Avenue Estate, Sutton Sankey Brook and Jackson/McCulloch Estate

SiteReference	SiteNameAddress	GeoX	GeoY	Hectares	OwnershipStatus	Deliverable	PlanningStatus	PermissionDate	MinNetDwellings	DevelopmentDescription	NonHousingDevelopment	Notes	FirstAddedDate	LastUpdatedDate
BR001	Land rear of 14 to 20 Weymouth Avenue, Parr, WA9 3QY	353739	394264	0.36	owned by a public authority	Yes	not permissioned		14			This is a cleared former housing site and has previously benefitted from planning permission for reside	19/12/2017	19/12/2017
BR002	Land between 8 & 34 Portland Way and 161 & 123 Berry's Lane, Parr, WA9 3QZ	353678	394269	0.28	owned by a public authority	Yes	not permissioned		11			This is a cleared former housing site and has previously benefitted from planning permission for reside	19/12/2017	19/12/2017
BR003	Land between Weymouth Avenue & Berry's Lane, Parr, WA9 3QT	353818	394337	0.52	not owned by a public authority	Yes	not permissioned		18			This is a cleared former housing site and has previously benefitted from planning permission for reside	19/12/2017	19/12/2017
BR004	Land at Park Road, St. Helens, WA9 1ER	352633	395781	0.78	mixed ownership	Yes	not permissioned		28			There are no policy or known physical constraints that would make the site unsuitable for housing. Site is identified as an urban village site in the St. Helens Core Strategy.	19/12/2017	19/12/2017
BR005	Moss Nook Urban Village, Watery Lane, St. Helens, WA9 3EN	353007	394292	26.74	mixed ownership	Yes	permissioned	22/05/2017	802	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail de			19/12/2017	19/12/2017
BR006	Land at Junction of Sunbury Street and Fir Street, Thatto Heath, WA10 3RL	349488	393665	0.82	not owned by a public authority	Yes	not permissioned		32			This cleared former housing site has an expired planning permission on the northern parcel. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017
BR007	Land rear of Carnegie Crescent and Goodban Street, Parr, WA9 3LX	353398	393768	0.26	not owned by a public authority	Yes	not permissioned		7			This cleared former garage site is in Helena Homes ownership who have indicated that they still intend to develop it.	19/12/2017	19/12/2017
BR008	Land at Somerset Street and Sussex Grove, Parr, WA9 1QN	352575	394908	2.21	not owned by a public authority	Yes	not permissioned		66			There are no known legal or ownership issues and the site is considered to be available immediately.	19/12/2017	19/12/2017
BR009	Land at corner of Fairclough Street and Wargrave Road, Earleston, WA12 9QU	357834	395237	0.41	mixed ownership	Yes	not permissioned		14			This cleared site is subject to some issues with land ownership but this is trying to be addressed with the land registry.	19/12/2017	19/12/2017
BR010	Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road, St. Helens, WA10 3:	350539	395104	0.83	mixed ownership	Yes	not permissioned		29			This is a part cleared and derelict site with an expired planning permission for apartments.	19/12/2017	19/12/2017
BR011	Former Sutton Arms PH, Elephant Lane, Thatto Heath, WA9 5HH	350694	393082	0.35	not owned by a public authority	Yes	not permissioned		18			Former Public House that was demolished following a fire, previously benefitted from planning permission.	19/12/2017	19/12/2017
BR012	Land & Premises at Lords Fold, Rainford, St. Helens, WA11 8HN	347258	401466	2.01	not owned by a public authority	Yes	pending decision		45	Outline application for residential development, all matters reserved except for access, including junction improvements at Lords Fold / Ormskirk Road.		Partly vacant employment site with current developer interest in site.	19/12/2017	19/12/2017
BR013	Land north of Elton Head Road, Thatto Heath, WA9 5GN	350724	392946	7.31	mixed ownership	Yes	not permissioned		219			No longer economically viable employment site with a planning application for housing on a larger site incorporating greenfield land in the process of being prepared.	19/12/2017	19/12/2017
BR014	Former Central Works, Church Road, Haydock, WA11 0GT	355993	396576	1.81	not owned by a public authority	Yes	not permissioned		48			This site is a cleared former industrial site which has previously benefitted from planning permission for residential development.	19/12/2017	19/12/2017
BR015	Site of former 56-120 Eccleston Street, St. Helens Town Centre, WA10 2PN	350250	395329	0.33	owned by a public authority	Yes	not permissioned		13			This is a cleared former housing site with prominent frontage along busy route into town centre.	19/12/2017	19/12/2017
BR016	Land north and south of Corporation Street, St. Helens Town Centre, WA9 1JU	351764	395574	3.23	mixed ownership	Yes	not permissioned		169			There is a mixed use masterplan being prepared for this site and the wider area surrounding the train t	19/12/2017	19/12/2017
BR017	BT Depot, Sutton Road, St. Helens Town Centre, WA9 3DZ	352867	394277	1.01	not owned by a public authority	Yes	permissioned	22/05/2017	36	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail de		This site forms part of the Moss Nook Watery Lane development (part of phase 3).	19/12/2017	19/12/2017
BR018	Former Pumping Station, Sutton Road, St. Helens Town Centre, WA9 3EW	353111	393942	0.27	not owned by a public authority	Yes	permissioned	22/05/2017	10	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail de		This site forms part of the Moss Nook Watery Lane development (part of phase 3).	19/12/2017	19/12/2017
BR019	Site of former Parr Community High School, Fleet Lane/Simms Avenue, Parr, WA9 1ST	353209	395151	1.52	owned by a public authority	Yes	not permissioned		54			Surplus land after redevelopment of school site.	19/12/2017	19/12/2017
BR020	Site of former St. Marks primary School, Willow Tree Avenue, Sutton, WA9 4LZ	352669	391807	0.5	owned by a public authority	Yes	not permissioned		18			Cleared former school site.	19/12/2017	19/12/2017
BR021	Site of former 119-133 Crow Lane West, Earlestown, WA12 9YN	357210	395673	0.3	mixed ownership	Yes	not permissioned		9			The site is in active use as a builders merchants, cessation of existing use required prior to potential redevelopment for housing.	19/12/2017	19/12/2017
BR022	Christ Church Parish Hall, Chapel Lane, Eccleston, WA10 5DA	348508	395692	0.36	mixed ownership	Yes	not permissioned		10			The site is in active use as a medical centre in portacabins within the grounds of the disused parish buil	19/12/2017	19/12/2017
BR023	Former St. Helens Glass, Atlas Street/Corporation Street, St. Helens Town Centre, WA10 1GF	351935	395634	2.37	not owned by a public authority	Yes	not permissioned		149			This site is cleared former industrial land within a central, urban location. Site would be suitable for hi	19/12/2017	19/12/2017
BR024	Site of former Our Lady's Primary School, Fleet Lane, Parr, WA9 2RL	353525	394882	0.61	not owned by a public authority	Yes	not permissioned		21			Part of cleared former school which has been redeveloped on adjacent parcel, now vacant site.	19/12/2017	19/12/2017
BR025	Auto Safety Centre, Vicarage Road, Blackbrook, WA11 0UJ	354323	397144	0.31	not owned by a public authority	Yes	not permissioned		9			This site is in active use as a car repair garage, cessation of existing use required prior to potential rede	19/12/2017	19/12/2017
BR026	Site of former 126-154 Birchley Street and 107-125 Brynn Street, (now known as Clifton Street Car I	351345	395879	0.25	owned by a public authority	Yes	not permissioned		10			This is a cleared former housing site that is in active use as a car park. There is potential that the site co	19/12/2017	19/12/2017
BR027	Land at Cowley Street and Albert Street, Moss Bank, WA10 1TY	351426	395538	32.06	not owned by a public authority	Yes	not permissioned		813			Partly vacant employment site with a masterplan for a mix of housing and employment uses being pre	19/12/2017	19/12/2017
BR028	Land to the rear of Juddfield Street, Blackbrook, WA11 0AZ	354226	397089	1.14	mixed ownership	Yes	not permissioned		41			Partly vacant employment site with a masterplan for a mix of housing and employment uses being prepared on a larger site incorporating greenfield land.	19/12/2017	19/12/2017
BR029	Halton and St Helens PCT HQ, Cowley Hill, Windle, WA10 2UE	350704	396290	1.17	not owned by a public authority	Yes	not permissioned		32			Former PCT Headquarters no longer in use.	19/12/2017	19/12/2017
BR030	Former Red Quarry, Chester Lane, Bold, WA9 4DA	351939	392090	1.93	not owned by a public authority	Yes	not permissioned		57			Former landfill site suitable for housing.	19/12/2017	19/12/2017
BR031	Land adjacent St. Helens Hospital, Marshalls Cross Road, St. Helens Town Centre, WA9 3BY	352287	394146	1.65	not owned by a public authority	Yes	not permissioned		59			Site is considered suitable for housing however a flood risk assessment would be required. Site could potentially come forward for residential development through the One Public Estate Government Programme.	19/12/2017	19/12/2017
BR032	College Street Northern Gateway, St. Helens Town Centre, WA10 1HT	351187	395798	2.88	owned by a public authority	Yes	not permissioned		103			The site is considered suitable for high density housing.	19/12/2017	19/12/2017
BR033	Land South of Knowsley Road, West Park, St. Helens, WA10 4PL	349775	395318	0.42	not owned by a public authority	Yes	not permissioned		18			Sustainable site suitable for housing.	19/12/2017	19/12/2017
BR034	Land south of Crab Street, St. Helens Town Centre, WA10 2JN	350862	395810	0.48	unknown ownership	Yes	not permissioned		21				19/12/2017	19/12/2017
BR035	The Beehive Inn, 268 Berrys Lane, St Helens, WA9 3HD	353526	394174	0.05	not owned by a public authority	Yes	permissioned	07/03/2006	8	Demolition of the Beehive public house and the erection of a three storey apartment block comprising 8no apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR036	Land and site of Bowling Green Inn and former Beehive Inn, Watery Lane, Parr, St. Helens, WA9 3HF	353503	394137	0.22	not owned by a public authority	Yes	permissioned	11/07/2016	26	Residential development of 2no 3 storey apartment buildings providing 26no dwellings with associated hard and soft landscaping and works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR037	The Globe, 142 Hardshaw Street, St. Helens, WA10 1JT	351447	395855	0.08	not owned by a public authority	Yes	permissioned	15/12/2009	6	Conversion of former Globe Hotel to create 6 new self contained flats and the retention of existing flat and office space. Total 7 flats (+6)		The site benefits from planning consent.	19/12/2017	19/12/2017
BR038	7a Cooper Lane, Haydock, WA11 0JH	355178	396811	0.09	not owned by a public authority	Yes	permissioned	12/08/2011	6	Reserved matters application pursuant to outline permission P/2010/0968 for the erection of a two storey apartment block comprising of 6no apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR039	Land site of and to rear of former 251 to 255 New Street, Sutton, St Helens	352299	392763	0.2	not owned by a public authority	Yes	permissioned	15/02/2017	8	Erection of 8no dwellings along with landscaping and associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR040	131 Brynn Street, Town Centre, St Helens, Merseyside, WA10 1HZ	351368	395898	0.05	not owned by a public authority	Yes	permissioned	17/02/2016	9	Re-submission of P/2012/0841 for the demolition of the single storey office building and erection of 2.5 - 3 storey residential units in two blocks with associated on sit.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR041	The Old Cottage Hospital, 386 Clipsley Lane, Haydock, WA11 0ST	355430	396837	0.12	not owned by a public authority	Yes	permissioned	20/11/2013	12	Resubmission of P/2013/0015 for the conversion of the former Cottage Hospital to create 12 flats.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR042	Former 2-40 Chancery Lane, Parr, WA9	353032	395153	0.21	not owned by a public authority	Yes	permissioned	18/12/2013	25	Erection of 25no. apartments with associated car parking and landscaping works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR043	Land at 135 Hall Street, St Helens, WA10 1EP	351716	395713	0.13	not owned by a public authority	Yes	permissioned	05/01/2017	11	Re-submission of P/2016/0334 for the construction of 11no terraced dwellings in 2 blocks plus associated parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR044	Land at Cannon Street, Clock Face, Bold, St. Helens, WA9 4XU	352078	391361	0.21	not owned by a public authority	Yes	permissioned	07/05/2015	10	Erection of 10no dwelling houses, parking and associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR045	Land at and including 24 Bewsey Street, Thatto Heath, St. Helens, WA10 3EG	349644	394068	0.12	not owned by a public authority	Yes	permissioned	26/11/2015	16	Demolition of existing buildings and erection of a part two storey / part three storey building to provide 16no flats with associated access, car parking and landscaping.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR046	Land site of former Engine Inn, 287 Newton Road, Parr, St Helens	354659	395215	0.18	not owned by a public authority	Yes	permissioned	21/01/2016	10	Erection of 10no dwellings with associated parking and additional works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR047	8-12 Ormskirk Street, Town Centre, St Helens, WA10 1BJ	351116	395402	0.03	not owned by a public authority	Yes	permissioned	11/12/2015	9	Change of use of first, second and third floors of licensed premises to 9no residential apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR048	92 St James Road, Rainhill, St Helens, L35 0PG	349241	390851	0.13	not owned by a public authority	Yes	permissioned	25/05/2016	8	Demolition of existing residential building with garage and erection of 3 storey building comprising of 8no apartments with associated landscaping and parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR049	23A Hardshaw Street, Town Centre, St Helens, WA10 1RT	351234	395408	0.02	not owned by a public authority	Yes	permissioned	26/04/2017	5	Prior notification under Schedule 2, Part 3 of Town and Country Planning (General Permitted Development Order)2015 for application for prior approval for conversion of existing office building to 5no f		The site benefits from planning consent.	19/12/2017	19/12/2017
BR050	Rainhill Club And Sports Lounge, Warburton Hey, Rainhill, St Helens, L35 4LF	349070	391588	0.24	not owned by a public authority	Yes	permissioned	17/11/2016	10	Reserved matters application pursuant to P/2016/0173 for 10no dwellings with regard to appearance, landscaping, layout and scale.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR051	Building Two Millfields Court, Tatton Way, Eccleston, St Helens	349019	395330	0.21	not owned by a public authority	Yes	permissioned	24/08/2016	8	Erection of a two storey building comprising of A1 and/or A3 uses on the ground floor and 8No. apartments at first floor along with car parking landscaping and associated		The site benefits from planning consent.	19/12/2017	19/12/2017
BR052	Land at East of 162 Alder Street, Newton Le Willows, St Helens, WA12 8HP	358704	395053	0.15	not owned by a public authority	Yes	permissioned	31/08/2016	5	Erection of 5no dwellings along with associated works, landscaping and car parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR053	Land at Legh Street, Newton Le Willows, St Helens	357387	395274	0.08	not owned by a public authority	Yes	permissioned	18/11/2016	10	Development of a 3no storey building comprising 5 ground floor commercial units (Use class A1) and 12no residential apartments to upper floors and loft with associated landscaping/terraces and servic		The site benefits from planning consent.	19/12/2017	19/12/2017
BR054	Hardshaw House, Tolver Street, St Helens, Merseyside, WA10 1EW	351452	395587	0.24	not owned by a public authority	Yes	permissioned	05/01/2017	26	Change of use of existing building into 26no flats with associated parking		The site benefits from planning consent.	19/12/2017	19/12/2017
BR055	Haydock Health and Medical Centre, 152 Station Road, Haydock, St Helens, WA11 0JN	355555	396731	0.23	not owned by a public authority	Yes	permissioned	09/02/2017	16	Outline application for the demolition of the existing building and erection of two apartment blocks providing 16 apartments including access and car parking (appearance, landscaping and scale reserver		The site benefits from planning consent.	19/12/2017	19/12/2017
BR056	Len Beaman Limited, Eccleston Street, Town Centre, St Helens, WA10 2PG	350402	395225	0.09	not owned by a public authority	Yes	permissioned	14/11/2016	5	Sub-division of the ground floor into 9No. A1 units including 9No. new shopfronts, first floor side extension and conversion of first floor into 5No. flats (1No two bedroom and 4No three bedroom) plus a:		The site benefits from planning consent.	19/12/2017	19/12/2017
BR057	Travers Farm, Travers Entry, Bold, St Helens, WA9 4TF	354446	392867	0.13	not owned by a public authority	Yes	permissioned	24/01/2017	8	Demolition of existing storage building and erection of 8 supportive care units with associated parking and landscaping.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR058	2 Greenwood Drive, Newton Le Willows, St Helens, WA12 8PA	358623	394615	0.13	not owned by a public authority	Yes	permissioned	23/01/2017	6	Demolition of existing building and erection of 6no dwellings along with associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017

BR059	Garage Site Adjacent To 17 Stephenson Road, Newton Le Willow's St Helens, WA12 8PB	358441	394621	0.09	not owned by a public authority	Yes	permissioned	26/01/2017	6	Demoltion of existing garages and erection of 6no flats.	The site benefits from planning consent. Larger site incorporating greenfield land being promoted and in the SHLAA.	19/12/2017	19/12/2017
BR060	Land at Holly Bank Street, St. Helens Town Centre, WA9 1EH	352273	395861	0.64	not owned by a public authority	Yes	pending decision		19	Application for the erection of 66no dwellings,incorporating 46 x 2 bed housed,2 x 3 bed houses and 18 x 1 bed flats with associated car parking,landscaping and new access road.	A masterplan is being prepared for a mix of housing and employment uses on a larger site incorporating greenfield land.	19/12/2017	19/12/2017
BR061	Alexander Park - Former Pilkington HQ, Prescot Road, West Park, St. Helens, WA10 3TP	349866	394584	9.24	not owned by a public authority	Yes	not permissioned		138		Part of the site is allocated in the UDP as "Publically Available Open Space" and part of the site is used as informal amenity greenspace, which may reduce the developable area, there are no other policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017
BR062	Land at Waterdale Crescent, Sutton, WA9 3PG	352809	393460	0.26	owned by a public authority	Yes	not permissioned		10		The site has been the subject of a development brief which includes the provision of a new rail station.	19/12/2017	19/12/2017
BR063	Land adjacent Laffak Road and Carr Mill Road, Moss Bank, WA11 7PT	352501	397430	3.31	mixed ownership	Yes	not permissioned		99		Cleared former school site. Larger site incorporating greenfield land in the SHLAA.	19/12/2017	19/12/2017
BR064	Site of former Carr Mill Infants School, Ullswater Ave, Moss Bank, WA11 7PT	351713	397599	0.74	owned by a public authority	Yes	not permissioned		29		The site is in use as a community centre, this would need to cease and the site cleared prior to development taking place. Slightly larger site incorporating greenfield land in the SHLAA.	19/12/2017	19/12/2017
BR065	Derbyshire Hill Family Centre, Derbyshire Hill Road, Parr, WA9 2LN	354430	394694	0.25	mixed ownership	Yes	not permissioned		10		This sports club and larger playing fields site is subject to a live planning application for residential development.	19/12/2017	19/12/2017
BR066	Sidac Sports & Social Club, Applecorn Close, Sutton, WA9 4NT	352931	392472	0.42	not owned by a public authority	Yes	pending decision		21	Redevelopment of the existing playing fields for residential development comprising 129 dwellings with associated works (compensatory provision is proposed under P/2016/0200) and works to Sidac Sc		19/12/2017	19/12/2017
BR067	HQ Apartments (former AC Complex Site), Shaw Street, Town Centre, WA10 1GF	351719	395647	1.38	not owned by a public authority	Yes	permissioned	22/11/2006	64	Development of 260 one and two bed apartments in three blocks with associated landscaping, access and parking.	3 blocks in total, 2 developed, leaving 64 units outstanding.	19/12/2017	19/12/2017
BR068	Haydock cricket and bowling club, Ireland Road, Haydock, WA11 0JH	355273	396768	0.67	not owned by a public authority	Yes	permissioned	16/11/2009	17	Partial demolition and refurbishment of existing bowling club including the creation of a new car park to serve the bowling club. Reduction in size of the bowling green and the erection of 1no. detached h	Under construction but historically stalled site.	19/12/2017	19/12/2017
BR069	Land off Monastery Lane, Sutton, WA9 3SW	353194	393129	2.03	not owned by a public authority	Yes	permissioned	05/06/2013	80	Outline application for residential development (all matters except for access reserved for future consideration).	Under construction but historically stalled.	19/12/2017	19/12/2017
BR070	Land at Baxters Lane, St. Helens, WA9 3EE	352858	394066	1.96	not owned by a public authority	Yes	permissioned	09/12/2013	84	Erection of 84no. dwellings including 9 flats, associated garages and parking, infrastructure, new access and closure of Webb Street.	Under construction but historically stalled sitel.	19/12/2017	19/12/2017
BR071	Former Caledonia Peugeot Garage, Knowsley Road, St Helens, WA10 4PL	349740	395337	0.96	not owned by a public authority	Yes	permissioned	01/02/2008	37	Mixed use development consisting of 80 residential units and a 100 bed nursing home	Under construction but historically stalled site.	19/12/2017	19/12/2017
BR072	Land off Stonecross Drive, Rainhill, L35 0QL	349395	390413	0.78	not owned by a public authority	Yes	permissioned	06/04/1998	7	Erection of 51 dwellings with associated roads garages and sewers.	Under construction but historically stalled site.	19/12/2017	19/12/2017
BR073	Vinden Glass Recycling, Lancots Lane, St. Helens, WA9 3GL	353105	393814	1.71	not owned by a public authority	Yes	permissioned	16/03/2017	53	Demolition of existing buildings and residential development comprising of 53 dwellings and associated works and landscaping.	Former glass recycling plant which has ceased use.	19/12/2017	19/12/2017
BR074	Land north of Edward Street, St. Helens Town Centre, WA9 3DP	352802	394466	1.2	not owned by a public authority	Yes	permissioned	29/03/2017	52	Erection of 52 dwellings, new access and ancillary works.	The site is a cleared former industrial premises, with some concrate hardstanding remaining.	19/12/2017	19/12/2017
BR075	Former Broad Oak Social Club and land rear of 1-21 Seath Avenue, Parr, WA9 1SH	353210	395457	0.53	not owned by a public authority	Yes	permissioned	27/01/2017	21	Outline application with all matters reserved, except for access and layout, for the demolition of existing buildings on the site,and the erection of 21no dwellings.	The cleared brownfield area has outline permission for 21 units.	19/12/2017	19/12/2017
BR076	The Black Horse, Moss Bank Road, Moss Bank, WA11 7DF	351424	398298	0.41	not owned by a public authority	Yes	permissioned	09/03/2017	16	Erection of 16 no. dwellings and associated works.	Some activity on site, but construction not yet commenced.	19/12/2017	19/12/2017
BR077	107 St. Helens Road, Eccleston Park, Eccleston, L34 6HP	347271	393309	0.37	not owned by a public authority	Yes	permissioned	19/07/2017	8	Conversion of pump house into one residential dwelling and the erection of 7No. Dwellings.	Work has yet to commence on site.	19/12/2017	19/12/2017
BR078	Land at Sorrel Way, Clock Face, Bold, WA9 4YN	352669	391228	0.36	not owned by a public authority	Yes	permissioned	30/10/2015	12	Erection of 12 no. dwellinghouses and ancillary works.	Work has yet to commence on site.	19/12/2017	19/12/2017
BR079	Clough Mill, Blundells Lane, Rainhill, L35 6ND	348321	390629	0.52	not owned by a public authority	Yes	permissioned	22/12/2016	10	Redevelopment of the site to provide 10 houses via a private road.	The site is currently still in operation as a factory manufacturing sheds. The site is predominatly indust	19/12/2017	19/12/2017
BR080	Land At 305 Walkers Lane Sutton Manor, Bold, WA9 4AQ	351187	391139	0.5	not owned by a public authority	Yes	permissioned	12/10/2016	16	Outline application with all matters reserved except for access for demolition of existing buildings and erection of 16no dwellings	Reservered Matters application P/2017/0772/RES is currently pending consideration.	19/12/2017	19/12/2017
BR081	Windlehurst Youth Centre Gamble Avenue, Windle, WA10 6Li	350254	396536	0.47	not owned by a public authority	Yes	permissioned	25/11/2016	12	Demolition of existing youth centre and erection of 12no dwellings along with new access road and associated landscaping.		19/12/2017	19/12/2017
BR082	Land to side and rear of 41-49 Old Wargrave Road, Newton-le-Willows, WA12 8NG	358015	394987	0.58	not owned by a public authority	Yes	permissioned	30/08/2016	60	Erection of 60no. Apartments with associaated landscaping and car parking.	This site has previously benefitted from permission to develop residential dwellings, and there is renev	19/12/2017	19/12/2017
BR083	Phase 4, land site of former Vulcan Works, Wargrave Road, Newton-le-Willows, WA12 8RS	358645	393938	3.78	not owned by a public authority	Yes	permissioned	07/03/2017	134	Erection of 134no. Dwellings persuant to outline permission P/14/0382		19/12/2017	19/12/2017
BR084	Land off Lowfield Lane, Thatto Heath, St. Helens, WA9 5BB	350426	392410	3.64	not owned by a public authority	Yes	permissioned	18/09/2015	114	Residential development for 114 dwellings.	The site was granted outline consent in 2006, and was Phase 4 of that overall masterplan and lies on a	19/12/2017	19/12/2017
BR085	Ibstocks, Chester Lane, Bold, St. Helens, WA9 4EN	351699	391937	8.56	not owned by a public authority	Yes	permissioned	25/05/2016	260	Hybrid Planning application proposing (i) Full Permission for importation of fill and profiling of the site, including the opening of the culverted watar course. (ii) Outline Permission for residential development (all matters other than access reserved)	The first stage of the development is reprofiling the levels on the site, cutting and backfill, following by	19/12/2017	19/12/2017
BR086	Phase 3 (aka 2b), land site of former Vulcan Works, Wargrave Road, Newton-le-Willows, WA12 8RN	358463	394104	2.54	not owned by a public authority	Yes	permissioned	05/09/2012	74	Reserved matters application for the access, appearance, landscaping, layout and scale for part of phase 2 to include a retail unit and residential development (64 houses and 11 work/live units) .	Work has yet to commence on site.	19/12/2017	19/12/2017
BR087	Fishwicks Industrial Estate, Baxters Lane, St. Helens, WA9 3NA	352536	393943	2.83	not owned by a public authority	Yes	permissioned	15/11/2016	93	Demolition of existing buildings and construction of 93 dwellings.		19/12/2017	19/12/2017
BR088	Penlake Industrial Estate Land At Emr Recycling And Former British Rail Club, Railway Embankment	353315	392960	10.23	not owned by a public authority	Yes	permissioned	11/12/2015	358	Hybrid Application - Full planning permission for demolition of existing metal recycling facility and remedi Mixed use development zone to include 390sq m of open use development (A1, A2, A3 and/or	Work has yet to commence on site.	19/12/2017	19/12/2017
BR089	Land at Lea Green Colliery and Lowfield Lane Industrial Estate, Thatto Heath, St. Helens, WA9 5BB	350388	392050	11.5	not owned by a public authority	Yes	permissioned	03/07/2007	8	Reserved matters application for parr of Lea Green Urban Village, new build for 364 dwellings, creche, retail (local store with associated landscaping.	Majority of site has been built out, only 8 residential dwellings are outstanding.	19/12/2017	19/12/2017
BR090	Former Pilkington's Site, City Road, Moss Bank, St. Helens, WA10 6PE	350863	397043	4.56	not owned by a public authority	Yes	permissioned	01/11/2013	10	Reserved matters for appearance, landscaping, layout and scale for the erection of 153 dwellings.	The remaining 10 residential units are under construction.	19/12/2017	19/12/2017
BR091	Pilkington (Eccleston Works), Millfields, WA10 5NR	348843	395240	9.57	not owned by a public authority	Yes	permissioned	02/11/2011	85	Reserved matters application pursuant to P/2009/0229 consisting of 262 No. dwellings including landscape spine and associated works.	The site is currently under construction.	19/12/2017	19/12/2017
BR092	Phases 2a & 2b, Land Site Of Former Vulcan Works, Wargrave Road, Newton-le-Willows, WA12	358636	394109	5.02	not owned by a public authority	Yes	permissioned	16/07/2012	31	Reserved matters application for the appearance, layout and scale comprising 208 dwellings and associated infrastructure.	31 residential units are yet to be constructed.	19/12/2017	19/12/2017
BR093	Sherdley Remec Ltd, Gorsey Lane, Clock Face, St. Helens, WA9 4SE	353485	391590	0.93	not owned by a public authority	Yes	permissioned	10/09/2015	14	Reserved matters for the erection of dwellings on plots 4,5,9,11and 17.		19/12/2017	19/12/2017
BR094	Land at Delta Road, Parr, St. Helens, WA9 2EA	353670	395558	1.33	not owned by a public authority	Yes	permissioned	02/06/2015	35	Residential development of 52no detached and semi-detached, 2, 3 and 4 bedroom dwellings together with associated works and demolition of existing church hall.	Need to check the site - as most of it is GF and work has started on site - could have already built out t	19/12/2017	19/12/2017
BR095	Saxon Court Keswick Road, Windle, St. Helens, WA10 2AT	350480	396012	0.42	not owned by a public authority	Yes	permissioned	20/04/2016	6	Erection of two storey and three storey front extension, three storey side extension, and two storey rear extension to create 6no. additional units, along with creation of 12no additional parking spaces.	The site is currently under construction.	19/12/2017	19/12/2017
BR096	Land at Lea Green Colliery and Lowfield Lestate, Lowfield lane, Thatto Heath	350680	392069	5.28	not owned by a public authority	Yes	permissioned	20/12/2013	103	Erection of 152 dwellings and open space.	103 residential units are yet to be constructed.	19/12/2017	19/12/2017
BR097	Polar Ford, City Road, Windle, St. Helens, WA10 6NZ	350759	397231	2.72	not owned by a public authority	Yes	permissioned	03/05/2011	81	Erection of 87 no. residential units consisting of 80no. dwellings and 7no. Apartments.	The site is currently under construction.	19/12/2017	19/12/2017
BR098	Deacon Trading Estate, Earlestown, WA12 9XD	357076	394942	9	not owned by a public authority	Yes	permissioned	10/06/2010	265	Outline application for mixed used development.	The site benefits from a number of planning consents, the latest being an outline approval for 82 dwell	19/12/2017	19/12/2017

Pivot table for Planning Status and minimum number of dwellings

Row Labels	Sum of MinNetDwellings
not permissioned	2396
pending decision	85
permissioned	3337
Grand Total	**5818**

Pivot table for Planning Status and number of sites

Row Labels	Count of PlanningStatus
not permissioned	35
pending decision	3
permissioned	60
Grand Total	**98**

SiteRefrence	SiteNameAddress	GeoX	GeoY	Hectares	OwnershipStatus	Deliverable	PlanningStatus	PermissionType	PermissionDate	MinNetDwellings	DevelopmentDescription	NonHousingDevelopment	Notes	FirstAddedDate	LastUpdatedDate
BR041	The Old Cottage Hospital, 386 Clipsley	355430	396837	0.12	not owned by a public authority	Yes	permissioned	full planning permission	09/05/2017	5	Erection of 5no dwellings along with associated parking and landscaping.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR049	23A Hardshaw Street, Town Centre, St	351234	395408	0.02	not owned by a public authority	Yes	permissioned	full planning permission	26/04/2017	5	Prior notification under Schedule 2, Part 3 of Town and Country Planning (General Permitted Development Order) 2015 for application for prior approval for conversion of existing office building to 5no flats at first		The site benefits from planning consent.	19/12/2017	19/12/2017
BR052	Land at East of 162 Alder Street, Newt	358704	395053	0.15	not owned by a public authority	Yes	permissioned	full planning permission	31/08/2016	5	Erection of 5no dwellings along with associated works, landscaping and car parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR056	Len Beaman Limited, Eccleston Street,	350402	395225	0.09	not owned by a public authority	Yes	permissioned	full planning permission	14/11/2016	5	Sub-division of the ground floor into 9No. A1 units including 9No. new shopfronts, first floor side extension and conversion of first floor into 5No. flats (1No two bedroom and 4No three bedroom) plus associated ext		The site benefits from planning consent.	19/12/2017	19/12/2017
BR037	The Globe, 142 Hardshaw Street, St. H	351447	395855	0.08	not owned by a public authority	Yes	permissioned	full planning permission	15/12/2009	6	Conversion of former Globe Hotel to create 6 new self-contained flats and the retention of existing flat and office space. Total 7 flats (+6)		The site benefits from planning consent.	19/12/2017	19/12/2017
BR038	7a Cooper Lane, Haydock, WA11 0JH	355178	396811	0.09	not owned by a public authority	Yes	permissioned	reserved matters approval	12/08/2011	6	Reserved matters application pursuant to outline permission P/2010/0968 for the erection of a two storey apartment block comprising of 6no apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR058	2 Greenwood Drive, Newton Le Willov	358623	394615	0.13	not owned by a public authority	Yes	permissioned	full planning permission	23/01/2017	6	Demolition of existing building and erection of 6no dwellings along with associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR059	Garage Site Adjacent To 17 Stephenso	358441	394621	0.09	not owned by a public authority	Yes	permissioned	full planning permission	26/01/2017	6	Demolition of existing garages and erection of 6no flats.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR106	Land adjacent to 107 Tolver Street, St.	351339	395639	0.05	not owned by a public authority	Yes	permissioned	full planning permission	08/06/2017	6	Erection of terraced block containing 6no. 3 bedroom dwellings.		This site benefits from full planning consent (Ref: P/2017/0327/FUL)	21/12/2018	21/12/2018
BR108	Land site of former 55 to 77 Howard S	349477	393546	0.18	not owned by a public authority	Yes	permissioned	full planning permission	11/07/2017	6	Erection of 6no one bedroom flats with associated parking.		This site benefits from full planning consent (Ref: P/2017/0416/FUL)	21/12/2018	21/12/2018
BR109	Former William Hill Bookmakers, Jubil	351978	391327	0.19	not owned by a public authority	Yes	permissioned	full planning permission	20/07/2017	6	Demolition of existing building, and erection of 2no. Semi-detached, and 4no. Terraced dwellings.		This site benefits from full planning consent (Ref: P/2017/0444/FUL) This cleared former garage site is in Helena Homes ownership who has indicated that they still intend to develop it.	21/12/2018	21/12/2018
BR007	Land rear of Carnegie Crescent and Gc	353398	393768	0.26	not owned by a public authority	Yes	not permissioned			7				19/12/2017	19/12/2017
BR072	Land off Stonecross Drive, Rainhill, L31	349395	390413	0.78	not owned by a public authority	Yes	permissioned	full planning permission	06/04/1998	7	Erection of 51 dwellings with associated roads garages and sewers.		Under construction but historically stalled site.	19/12/2017	19/12/2017
BR100	Land at 21 Waterdale Crescent, St. He	352751	393485	0.04	not owned by a public authority	Yes	permissioned	full planning permission	12/10/2017	7	Erection of 7no. Apartments and associated landscaping and parking.		The site benefits from planning consent (ref: P/2017/0655/FUL).	21/12/2018	21/12/2018
BR105	Land between 62 and 70 Lowfield Lane	350634	392171	0.14	not owned by a public authority	Yes	permissioned	full planning permission	23/06/2017	7	Erection of 7no. Dwellings with associated parking and landscaping.		This site benefits from full planning consent (Ref: P/2017/0324/FUL)	21/12/2018	21/12/2018
BR035	The Beehive Inn, 268 Berrys Lane, St	353526	394174	0.05	not owned by a public authority	Yes	permissioned	full planning permission	07/03/2006	8	Demolition of the Beehive public house and the erection of a three storey apartment block comprising 8no apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR039	Land site of and to rear of former 251	352299	392763	0.2	not owned by a public authority	Yes	permissioned	full planning permission	15/02/2017	8	Erection of 8no dwellings along with landscaping and associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR048	92 St James Road, Rainhill, St Helens,	349241	390851	0.13	not owned by a public authority	Yes	permissioned	full planning permission	25/05/2016	8	Demolition of existing residential building with garage and erection of 3 storey building comprising of 8no apartments with associated landscaping and parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR051	Building Two Millfields Court, Tatton \	349019	395330	0.21	not owned by a public authority	Yes	permissioned	full planning permission	24/08/2016	8	Erection of a two storey building comprising of A1 and/or A3 uses on the ground floor and 8No. apartments at first floor along with car parking landscaping and associated		The site benefits from planning consent.	19/12/2017	19/12/2017
BR057	Travers Farm, Travers Entry, Bold, St	354446	392867	0.13	not owned by a public authority	Yes	permissioned	full planning permission	24/01/2017	8	Demolition of existing storage building and erection of 8 supportive care units with associated parking and landscaping.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR077	107 St. Helens Road, Eccleston Park, E	347271	393309	0.37	not owned by a public authority	Yes	permissioned	full planning permission	19/07/2017	8	Conversion of pump house into one residential dwelling and the erection of 7 No. Dwellings.		Work has yet to commence on site.	19/12/2017	19/12/2017
BR107	Land at Dorothy Street, Thatto Heath,	350147	393457	0.19	not owned by a public authority	Yes	permissioned	full planning permission	07/06/2017	8	Erection of 8no two bed bungalows with associated parking and landscaping.		This site benefits from full planning consent (Ref: P/2017/0415/FUL) The site is in active use as a builders merchants, cessation of existing use required prior to potential redevelopment for housing.	21/12/2018	21/12/2018
BR021	Site of former 119-133 Crow Lane We	357210	395673	0.3	mixed ownership	Yes	not permissioned			9				19/12/2017	19/12/2017
BR025	Auto Safety Centre, Vicarage Road, Bi	354323	397144	0.31	not owned by a public authority	Yes	not permissioned			9			This site is in active use as a car repair garage, cessation of existing use required prior to potential redevelopment for housing.	19/12/2017	19/12/2017
BR040	131 Brynn Street, Town Centre, St He	351368	395898	0.05	not owned by a public authority	Yes	permissioned	outline planning permission	17/02/2016	9	Re-submission of P/2012/0841 for the demolition of the single storey office building and erection of 2.5 - 3 storey residential units in two blocks with associated on site.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR047	8-12 Ormskirk Street, Town Centre, St	351116	395402	0.03	not owned by a public authority	Yes	permissioned	full planning permission	11/12/2015	9	Change of use of first, second and third floors of licensed premises to 9no residential apartments.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR110	Land at Knowles House Avenue and M	347914	395444	0.26	not owned by a public authority	Yes	permissioned	full planning permission	22/03/2018	9	Erection of 7no houses and 2no bungalows with associated landscaping, car parking and new access road.		This site benefits from full planning consent (Ref: P/2018/0065/FUL)	21/12/2018	21/12/2018
BR018	Former Pumping Station, Sutton Road	353111	393942	0.27	not owned by a public authority	Yes	permissioned	outline planning permission	22/05/2017	10	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development		This site forms part of the Moss Nook Watery Lane development (part of phase 3).	19/12/2017	19/12/2017
BR022	Christ Church Parish Hall, Chapel Lane	348508	395692	0.36	mixed ownership	Yes	not permissioned			10			The site is in active use as a medical centre in portacabins within the grounds of the disused parish buildings, cessation of existing use required prior to potential redevelopment for housing.	19/12/2017	19/12/2017
BR026	Site of former 126-154 Birchley Street	351345	395879	0.25	owned by a public authority	Yes	not permissioned			10			This is a cleared former housing site that is in active use as a car park. There is potential that the site could be released for development as part of the One Public Estate Programme.	19/12/2017	19/12/2017
BR044	Land at Cannon Street, Clock Face, Bo	352078	391361	0.21	not owned by a public authority	Yes	permissioned	full planning permission	07/05/2015	10	Erection of 10no dwelling houses, parking and associated works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR046	Land site of former Engine Inn, 287 Ne	354659	395215	0.18	not owned by a public authority	Yes	permissioned	full planning permission	21/01/2016	10	Erection of 10no dwellings with associated parking and additional works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR050	Rainhill Club And Sports Lounge, Wart	349070	391588	0.24	not owned by a public authority	Yes	permissioned	full planning permission	17/11/2016	10	Reserved matters application pursuant to P/2016/0173 for 10no dwellings with regard to appearance, landscaping, layout and scale.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR053	Land at Leigh Street, Newton Le Willov	357387	395274	0.08	not owned by a public authority	Yes	permissioned	full planning permission	18/11/2016	10	Development of a 3no storey building comprising 5 ground floor commercial units (Use class A1) and 12no residential apartments to upper floors and loft with associated landscaping/terraces and service area.		The site benefits from planning consent. Part of the site is allocated in the UDP as "Publically Available Open Space" and part of the site is used as informal amenity greenspace, which may reduce the developable area, there are no other policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017
BR062	Land at Waterdale Crescent, Sutton, V	352809	393450	0.26	owned by a public authority	Yes	not permissioned			10			The site is in use as a community centre, this would need to cease and the site cleared prior to development taking place. Slightly larger site incorporating greenfield land in the SHLAA.	19/12/2017	19/12/2017
BR065	Derbyshire Hill Family Centre, Derbyal	354430	394694	0.25	mixed ownership	Yes	not permissioned			10				19/12/2017	19/12/2017
BR079	Clough Mill, Blundells Lane, Rainhill, L	348321	390629	0.52	not owned by a public authority	Yes	permissioned	outline planning permission	22/12/2016	10	Redevelopment of the site to provide 10 houses via a private road.		The site is currently still in operation as a factory manufacturing sheds. The site is predominantly industrial but also includes one residential property.	19/12/2017	27/11/2018
BR090	Former Pilkington's Site, City Road, W	350863	397043	4.56	not owned by a public authority	Yes	permissioned	full planning permission	01/11/2013	10	Reserved matters for appearance, landscaping, layout and scale for the erection of 153 dwellings.		The remaining 10 residential units are under construction.	19/12/2017	19/12/2017
BR002	Land between 8 & 34 Portland Way ar	353678	394269	0.28	owned by a public authority	Yes	permissioned	full planning permission	06/10/2017	11	Residential development consisting of 52 no. dwelling houses, landscaping and related infrastructure.		This is a cleared former housing site which now benefits from full planning consent (Ref: P/2016/0923/FUL) and includes BR001 and BR003.	19/12/2017	21/12/2018
BR043	Land at 135 Hall Street, St Helens, WA	351716	395713	0.13	not owned by a public authority	Yes	permissioned	full planning permission	05/01/2017	11	Re-submission of P/2016/0334 for the construction of 11no terraced dwellings in 2 blocks plus associated parking.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR102	Former Legh Arms, 1 Mill Lane, Newto	359356	395405	0.09	not owned by a public authority	Yes	permissioned	full planning permission	22/05/2017	11	Conversion of existing public house into 9no. Self-contained apartments and 2no. Town houses with associated extensions, alterations, removal of chimney together with provision of parking and amenity space.		This site benefits from full planning consent (Ref: P/2017/0150/FUL)	21/12/2018	21/12/2018
BR078	Land at Sorrel Way, Clock Face, Bold, \	352669	391228	0.36	not owned by a public authority	Yes	permissioned	full planning permission	30/10/2015	12	Erection of 12 no. dwelling houses and ancillary works.		Work has yet to commence on site.	19/12/2017	19/12/2017
BR081	Windlehurst Youth Centre Gamble Av	350254	396536	0.47	not owned by a public authority	Yes	permissioned	full planning permission	25/11/2016	12	Demolition of existing youth centre and erection of 12no dwellings along with new access road and associated landscaping.			19/12/2017	19/12/2017
BR015	Site of former 56-120 Eccleston Street	350250	395329	0.33	owned by a public authority	Yes	not permissioned			13			This is a cleared former housing site with prominent frontage along busy route into town centre.	19/12/2017	19/12/2017
BR104	Doctors Surgery, 100-102 Market Stree	357284	395458	0.05	not owned by a public authority	Yes	pending decision	full planning permission		13	Change of use from vacant doctor's surgery to provide 13 residential apartments, demolition of part of the rear outrigger, first floor of a first floor rear extension with roof accommodation, external alterations, park		This site benefits from developer interest with full planning consent (Ref: P/2018/0135/FUL) pending	21/12/2018	21/12/2018
BR001	Land rear of 14 to 20 Weymouth Aven	353739	394264	0.36	owned by a public authority	Yes	permissioned	full planning permission	06/10/2017	14	Residential development consisting of 52 no. dwelling houses, landscaping and related infrastructure.		This is a cleared former housing site which now benefits from full planning consent (Ref: P/2016/0923/FUL) and includes BR002 and BR003. This cleared site is subject to some issues with land ownership but this is trying to be addressed with the land registry.	19/12/2017	21/12/2018
BR009	Land at corner of Fairclough Street an	357834	395237	0.41	mixed ownership	Yes	not permissioned			14				19/12/2017	19/12/2017
BR093	Sherdley Remec Ltd, Gorsey Lane, Clo	353485	391590	0.93	not owned by a public authority	Yes	permissioned	full planning permission	10/09/2015	14	Reserved matters for the erection of dwellings on plots 4, 5, 9, 11 and 17.			19/12/2017	19/12/2017
BR045	Land at and including 24 Bewsey Stree	349644	394068	0.12	not owned by a public authority	Yes	permissioned	full planning permission	16/11/2015	16	Demolition of existing buildings and erection of a part two storey / part three storey building to provide 16no flats with associated access, car parking and landscaping.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR055	Haydock Health and Medical Centre, 1	355555	396731	0.23	not owned by a public authority	Yes	permissioned	outline planning permission	09/02/2017	16	Outline application for the demolition of the existing building and erection of two apartment blocks providing 16 apartments including access and car parking (appearance, landscaping and scale reserved).		The site benefits from planning consent. The site is under construction.	19/12/2017	19/12/2017
BR076	The Black Horse, Moss Bank Road, Mc	351424	398298	0.41	not owned by a public authority	Yes	permissioned	full planning permission	09/03/2017	16	Erection of 16 no. dwellings and associated works.		Remove from Register as all are low built out with only 3 left up for sale	19/12/2017	21/12/2018
BR080	Land At 305 Walkers Lane Sutton Mar	351187	391139	0.5	not owned by a public authority	Yes	permissioned	reserved matters approval	04/01/2018	16	Reserved matters application pursuant to P/2016/0422/OUP for 16no dwellings with regards to appearance, landscaping, layout and scale.		This site benefits from planning consent (ref: P/2017/0772/RES)	19/12/2017	21/12/2018
BR099	Millbrook Hostel, 12 Mulcrow Close, S	352854	395996	0.26	not owned by a public authority	Yes	permissioned	full planning permission	20/12/2017	16	Erection of 16no. Dwellings along with associated landscaping works and parking.		The site benefits from planning consent.	21/12/2018	21/12/2018
BR068	Haydock cricket and bowling club, Ind	355273	396768	0.67	not owned by a public authority	Yes	permissioned	full planning permission	16/11/2009	17	Partial demolition and refurbishment of existing bowling club including the creation of a new car park to serve the bowling club. Reduction in size of the bowling green and the erection of 1no. detached house and 1		Under construction but historically stalled site. An application was approved in 2017 (ref: P/2017/0598/73) for the variation of house types to change the 2 bedroom dwellings to 3 bedroom, which meant the initial layout has also been amended.	19/12/2017	21/12/2018
BR003	Land between Weymouth Avenue & B	353818	394337	0.52	not owned by a public authority	Yes	permissioned	full planning permission	06/10/2017	18	Residential development consisting of 52 no. dwelling houses, landscaping and related infrastructure.		This is a cleared former housing site which now benefits from full planning consent (Ref: P/2016/0923/FUL) and includes BR001 and BR002. Former Public House that was demolished following a fire, previously benefitted from planning permission.	19/12/2017	21/12/2018
BR011	Former Sutton Arms PH, Elephant Lan	350694	393082	0.35	not owned by a public authority	Yes	not permissioned			18			Cleared former school site.	19/12/2017	19/12/2017
BR020	Site of former St. Marks primary Scho	352669	391807	0.5	owned by a public authority	Yes	not permissioned			18			The site is considered suitable for high density housing and now forms part of an application for 50 new dwellings on a larger site.	19/12/2017	19/12/2017
BR033	Land South of Knowsley Road, West P	349775	395318	0.42	not owned by a public authority	Yes	pending decision	full planning permission		18	Development of 50 residential units with a mix of houses and apartments			19/12/2017	21/12/2018
BR101	Raven Lodge, 113 Church Street, St. H	351454	395234	0.1	not owned by a public authority	Yes	permissioned	full planning permission	11/12/2017	18	Conversion of former public house into 18no. Self-contained flats.		This site benefits from full planning consent (Ref: P/2017/0742/FUL) Larger site incorporating greenfield land being promoted and in the SHLAA.	21/12/2018	22/12/2018
BR060	Land at Holly Bank Street, St. Helens T	352273	395861	0.64	not owned by a public authority	Yes	pending decision	full planning permission		19	Application for the erection of 66no dwellings, incorporating 46 x 2 bed housed,2 x 3 bed houses and 18 x 1 bed flats with associated car parking,landscaping and new access road.			19/12/2017	19/12/2017
BR024	Site of former Our Lady's Primary Sch	353525	394832	0.61	not owned by a public authority	Yes	not permissioned			21			Part of cleared former school which has been redeveloped on adjacent parcel, now vacant site.	19/12/2017	19/12/2017
BR066	Sidac Sports & Social Club, Appleacorn	352931	392472	0.42	not owned by a public authority	Yes	permissioned	full planning permission	18/01/2018	21	Redevelopment of the existing playing fields for residential development comprising 129 dwellings with associated works (compensatory provision is proposed under P/2016/0200) and works to Sidac Social Club Inc		This sports club and larger playing fields site now benefits from full planning consent.	19/12/2017	21/12/2018
BR075	Former Broad Oak Social Club and lan	353210	395457	0.53	not owned by a public authority	Yes	permissioned	outline planning permission	27/01/2017	21	Outline application with all matters reserved, except for access and layout, for the demolition of existing buildings on the site, and the erection of 21no dwellings.		The cleared brownfield area has outline permission for 21 units.	19/12/2017	19/12/2017
BR042	Former 2-4D Chancery Lane, Parr, WA	353032	395153	0.21	not owned by a public authority	Yes	permissioned	full planning permission	18/12/2013	25	Erection of 25no. apartments with associated car parking and landscaping works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR103	Land opposite allotment gardens, Bed	352897	394911	0.77	not owned by a public authority	Yes	not permissioned			25			There are no policy or known physical constraints that would make the site unsuitable for housing.	21/12/2018	21/12/2018
BR036	Land and site of Bowling Green Inn an	353503	394137	0.22	not owned by a public authority	Yes	permissioned	full planning permission	11/07/2016	26	Residential development of 2no 3 storey apartment buildings providing 26no dwellings with associated hard and soft landscaping and works.		The site benefits from planning consent.	19/12/2017	19/12/2017
BR054	Hardshaw House, Tolver Street, St Hel	351452	395587	0.24	not owned by a public authority	Yes	permissioned	full planning permission	05/01/2017	26	Change of use of existing building into 26no flats with associated parking		The site benefits from planning consent.	19/12/2017	19/12/2017
BR004	Land at Park Road, St. Helens, WA9 1E	352633	395781	0.78	mixed ownership	Yes	permissioned	full planning permission	04/12/2017	28	Erection of 28no. Dwellings incorporating 20 x 2 bed houses and 6 x 1 bed apartments, with associated car parking, landscaping and alterations to the existing pedestrian footway.		This is a cleared former housing site. Now part of the site benefits from planning consent (ref: P/2017/0672/FUL). This is a part cleared and derelict site with an expired planning permission for apartments.	19/12/2017	21/12/2018
BR010	Liverpool Arms and Former Sacred He	350539	395104	0.83	mixed ownership	Yes	not permissioned			29				19/12/2017	19/12/2017
BR064	Site of former Carr Mill Infants School,	351713	397599	0.74	owned by a public authority	Yes	not permissioned			29			Cleared former school site. Larger site incorporating greenfield land in the SHLAA.	19/12/2017	21/12/2018
BR092	Phases 2a & 2b, Land Site Of Former \	358636	394109	5.02	not owned by a public authority	Yes	permissioned	full planning permission	16/07/2012	31	Reserved matters application for the appearance, layout and scale comprising 208 dwellings and associated infrastructure.		31 residential units are yet to be constructed. This cleared former housing site has an expired planning permission on the northern parcel. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017
BR006	Land at junction of Sunbury Street and	349488	393665	0.82	not owned by a public authority	Yes	not permissioned			32			Former PCT Headquarters no longer in use.	19/12/2017	19/12/2017
BR029	Halton and St Helens PCT HQ, Cowley	350704	396290	1.17	not owned by a public authority	Yes	not permissioned			32				19/12/2017	19/12/2017
BR094	Land at Delta Road, Parr, St. Helens, W	353670	395558	1.33	not owned by a public authority	Yes	permissioned	full planning permission	02/06/2015	35	Residential development of 52no detached and semi-detached, 2, 3 and 4 bedroom dwellings together with associated works and demolition of existing church hall.		Need to check the site - as most of it is GF and work has started on site - could have already built out the Brownfield element.	19/12/2017	19/12/2017
BR017	BT Depot, Sutton Road, St. Helens Tow	352867	394277	1.01	not owned by a public authority	Yes	permissioned	outline planning permission	22/05/2017	36	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development		This site forms part of the Moss Nook Watery Lane development (part of phase 3).	19/12/2017	19/12/2017
BR071	Former Caledonia Peugeot Garage, K	349740	395337	0.96	not owned by a public authority	Yes	permissioned	full planning permission	01/02/2008	37	Mixed use development consisting of 80 residential units and a 100 bed nursing home		Under construction but historically stalled site. Partly vacant employment site with a masterplan for a mix of housing and employment uses being prepared on a larger site incorporating greenfield land.	19/12/2017	19/12/2017
BR028	Land to the rear of Juddfield Street, BL	354226	397089	1.14	mixed ownership	Yes	not permissioned			41				19/12/2017	19/12/2017
BR012	Land & Premises at Lords Fold, Rainho	347258	401466	2.01	not owned by a public authority	Yes	pending decision	outline planning permission		45	Outline application for residential development, all matters reserved except for access, including junction improvements at Lords Fold / Ormskirk Road.		Partly vacant employment site with current developer interest in site. This site is a cleared former industrial site which has previously benefitted from planning permission for residential development.	19/12/2017	27/11/2018
BR014	Former Central Works, Church Road, I	355993	396576	1.81	not owned by a public authority	Yes	not permissioned			48				19/12/2017	19/12/2017
BR074	Land north of Edward Street, St. Helen	352802	394466	1.2	not owned by a public authority	Yes	permissioned	full planning permission	29/03/2017	52	Erection of 52 dwellings, new access and ancillary works.		The site is a cleared former industrial premises, with some concrete hardstanding remaining.	19/12/2017	19/12/2017
BR073	Viridor Glass Recycling, Lancots Lane,	353105	393814	1.71	not owned by a public authority	Yes	permissioned	full planning permission	16/03/2017	53	Demolition of existing buildings and residential development comprising of 53 dwellings and associated works and landscaping.		Former glass recycling plant which has ceased use.	19/12/2017	19/12/2017
BR019	Site of former Parr Community High Sc	353209	395151	1.52	owned by a public authority	Yes	not permissioned			54			Surplus land after redevelopment of school site.	19/12/2017	19/12/2017
BR030	Former Red Quarry, Chester Lane, Bol	351939	392090	1.93	not owned by a public authority	Yes	not permissioned			57			Former landfill site suitable for housing.	19/12/2017	19/12/2017
BR031	Land adjacent St. Helens Hospital, Mai	352287	394146	1.65	not owned by a public authority	Yes	not permissioned			59			Site is considered suitable for housing however a flood risk assessment would be required.	19/12/2017	19/12/2017
BR082	Land to side and rear of 41-49 Old Wa	358015	394987	0.58	not owned by a public authority	Yes	permissioned	full planning permission	30/08/2016	60	Erection of 60no. Apartments with associated landscaping and car parking.		This site has previously benefitted from permission to develop residential dwellings, and there is renewed developer interest in this site.	19/12/2017	19/12/2017

										Sustainable site suitable for housing, planning application pending (Ref. P/2018/0021/FUL)		
BR034	Land south of Crab Street, St. Helens T 350862 395810	0.48	not owned by a public authority	Yes	pending decision	full planning permission		61	Erection of an over 55's facility incorporating 61 apartments split into 3 storey building and a 4 storey building with associated car parking and landscaping.		19/12/2017	21/12/2018
BR067	HQ Apartments (former AC Complex S 351719 395647	1.38	not owned by a public authority	Yes	permissioned	full planning permission	22/11/2006	64	Development of 260 one and two bed apartments in three blocks with associated landscaping, access and parking.	3 blocks in total, 2 developed, leaving 64 units outstanding. There are no known legal or ownership issues and the site is considered to be available immediately.	19/12/2017	19/12/2017
								66			19/12/2017	19/12/2017
BR008	Land at Somerset Street and Sussex Gr 352575 394908	2.21	not owned by a public authority	Yes	not permissioned			74	Reserved matters application for the access, appearance, landscaping, layout and scale for part of phase 2 to include a retail unit and residential development (64 houses and 11 work/live units).	Work has yet to commence on site.	19/12/2017	19/12/2017
BR086	Phase 3 (aka 2b), land site of former V 358463 394104	2.54	not owned by a public authority	Yes	permissioned	full planning permission	05/09/2012	80	Outline application for residential development (all matters except for access reserved for future consideration).	Under construction but historically stalled.	19/12/2017	19/12/2017
BR069	Land off Monastery Lane, Sutton, WA(353194 393129	2.03	not owned by a public authority	Yes	permissioned	outline planning permission	05/06/2013	81	Erection of 87 no. residential units consisting of 80no. dwellings and 7no. Apartments.	The site is currently under construction.	19/12/2017	19/12/2017
BR097	Polar Ford, City Road, Windle, St. Hele 350759 397231	2.72	not owned by a public authority	Yes	permissioned	full planning permission	03/05/2011	84	Erection of 84no. dwellings including 9 flats, associated garages and parking, infrastructure, new access and closure of Webb Street.	Under construction but historically stalled site.	19/12/2017	19/12/2017
BR070	Land at Baxters Lane, St. Helens, WA9 352858 394066	1.96	not owned by a public authority	Yes	permissioned	full planning permission	09/12/2013	85	Reserved matters application pursuant to P/2009/0329 consisting of 262 No. dwellings including landscape spine and associated works.	The site is currently under construction.	19/12/2017	19/12/2017
BR091	Pilkington (Eccleston Works), Millfield 348843 395240	9.57	not owned by a public authority	Yes	permissioned	full planning permission	02/11/2011	93	Demolition of existing buildings and construction of 93 dwellings.		19/12/2017	19/12/2017
BR087	Fishwicks Industrial Estate, Baxters Lai 352536 393943	2.83	not owned by a public authority	Yes	permissioned	outline planning permission	15/11/2016					
	Land adjacent Laffak Road and Carr Mill Road, Moss Bank, WA11 9LG									The site has been the subject of a development brief which includes the provision of a new rail station.		
BR063	352501 397430	3.31	mixed ownership	Yes	not permissioned			99		Site could potentially come forward for residential development through the One Public Estate Government Programme.	19/12/2017	19/12/2017
								103			19/12/2017	19/12/2017
BR032	College Street Northern Gateway, St. I 351187 395798	2.88	owned by a public authority	Yes	not permissioned			103	Erection of 152 dwellings and open space.	103 residential units are yet to be constructed.	19/12/2017	19/12/2017
BR096	Land at Lea Green Colliery and Lowfiel 350680 392069	5.28	not owned by a public authority	Yes	permissioned	full planning permission	20/12/2013	114	Residential development for 114 dwellings.	The site was granted outline consent in 2006, and was Phase 4 of that overall masterplan and lies on a former colliery and brickworks site.	19/12/2017	19/12/2017
BR084	Land off Lowfield Lane, Thatto Heath, 350426 392410	3.64	not owned by a public authority	Yes	permissioned	full planning permission	18/09/2015	134	Erection of 134no. Dwellings pursuant to outline permission P/14/0382		19/12/2017	19/12/2017
BR083	Phase 4, land site of former Vulcan Wa 358645 393938	3.78	not owned by a public authority	Yes	permissioned	full planning permission	07/03/2017			A masterplan is being prepared for a mix of housing and employment uses on a larger site incorporating greenfield land.	19/12/2017	19/12/2017
BR061	Alexander Park - Former Pilkington HC 349866 394584	9.24	not owned by a public authority	Yes	not permissioned			138		This site is cleared former industrial land within a central, urban location. Site would be suitable for high density development. A planning application has now been received for part of the site (ref: P/2017/0634/FUL) for a high density development.		
BR023	Former St. Helens Glass, Atlas Street/L 351935 395634	2.37	not owned by a public authority	Yes	permissioned	full planning permission	06/11/2017	149	Erection of a 5 storey building comprising of 130 extra care apartments, with associated highway works, parking and landscaping.	The southern section of the site does not benefit from planning consent.	19/12/2017	19/12/2017
BR016	Land north and south of Corporation S 351764 395574	3.23	mixed ownership	Yes	not permissioned			169		There is a mixed use masterplan being prepared for this site and the wider area surrounding the train station as part of the One Public Estate programme. No longer economically viable employment site with a planning application for housing on a larger site incorporating greenfield land in the process of being prepared.	19/12/2017	19/12/2017
BR013	Land north of Elton Head Road, Thatto 350724 392946	7.31	mixed ownership	Yes	not permissioned			219			19/12/2017	19/12/2017
									Hybrid Planning application proposing (i) Full Permission for importation of fill and profiling of the site, including the opening of the culverted water course.			
BR085	Ibstocks, Chester Lane, Bold, St. Helen 351669 391937	8.56	not owned by a public authority	Yes	permissioned	other	25/05/2016	260	(ii) Outline Permission for residential development (all matters other than access reserved)	The first stage of the development is re-profiling the levels on the site, cutting and backfill, following by settling and testing's.	19/12/2017	19/12/2017
BR098	Deacon Trading Estate, Earlestown, W 357117 395059	9	not owned by a public authority	Yes	permissioned	reserved matters approval	17/07/2015	324	Reserved matters application for residential development comprising the construction of 324 dwellings (Amended Proposal), creation of public open space and associated works.	The site benefits from a number of planning consents, the latest being a reserved matters for 324 dwellings. Parts of the site are currently under construction.	19/12/2017	19/12/2017
BR088	Penlake Industrial Estate Land At Emr 353315 392960	10.23	not owned by a public authority	Yes	permissioned	other	11/12/2015	358	Hybrid Application - Full planning permission for demolition of existing metal recycling facility and remediation of the site. Outline planning permission for residential deve	Mixed use development zone to include 35 Work has yet to commence on site. Site is identified as an urban village site in the St. Helens Core Strategy.	19/12/2017	19/12/2017
BR005	Moss Nook Urban Village, Watery Lan 353007 394292	26.74	mixed ownership	Yes	permissioned	outline planning permission	22/05/2017	802	Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development		19/12/2017	19/12/2017
BR027	Land at Cowley Street and Albert Stree 351426 396538	32.06	not owned by a public authority	Yes	not permissioned			813		Partly vacant employment site with a masterplan for a mix of housing and employment uses being prepared on a larger site incorporating greenfield land.	19/12/2017	19/12/2017

Pivot table for Planning Status and minimum number of dwellings

Planning Status	2018 numbers
Row Labels	**Sum of MinNetDwellings**
not permissioned	2162
pending decision	156
permissioned	3710
Grand Total	**6028**

2017 MinNetDwelling	5818
2018 - 2017 numbers	210
% change	4%
Adopted number of dwellings a year to be built	486
Number of years worth of housing development on brownfield with planning permission	7.63
Number of years worth of housing development on brownfield total	12.40
Residual requirement over Local Plan period from 1 April 202	7245
Residual required above brownfield	1217
Total hectares on brownfield register	202.51
0.25hectares for 5 dwellings	
Shortfall of land for 1217 homes	60.85
Hectares of Group C contaminated land	3170
Percentage of land to be remediated	2%

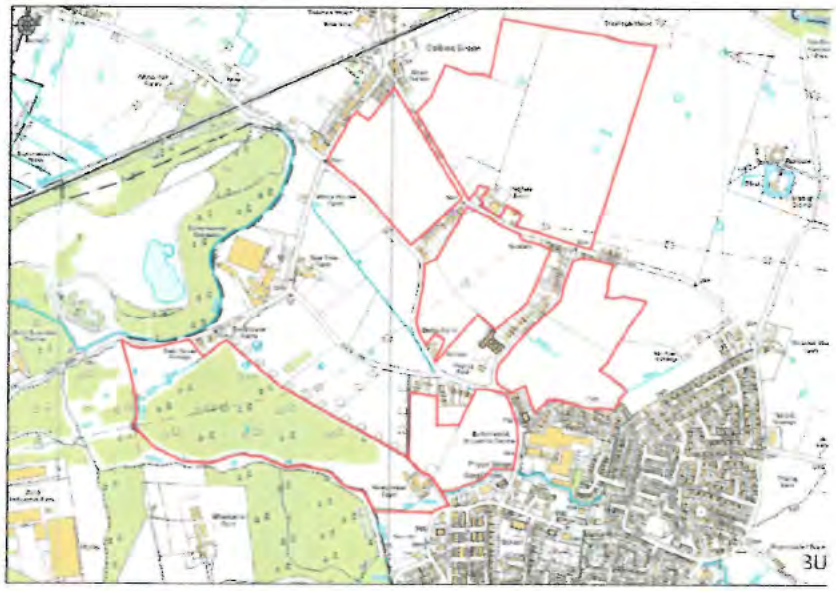
Pivot table for Planning Status and number of sites

Planning Status	2018 number of sites
Row Labels	**Count of PlanningStatus**
not permissioned	29
pending decision	5
permissioned	74
Grand Total	**108**

2017 count of sites	98
2018 - 2017 number	10
% change	10.20%

Row Labels	Sum of Hectares
not permissioned	76.81
pending decision	3.6
permissioned	122.1
Grand Total	**202.51**

Appendix E



Land & Development Contacts

[redacted]

Land off Phipps Lane, Burtonwood, Warrington

Land off Phipps Lane, Burtonwood, Warrington

Description Location

6 parcels of land north of Burtonwood totalling 226 acres.

Broadband Speed Check

LOCATION

6 parcels of land north of Burtonwood approximately 4 miles from Warrington town centre and St Helens, and 17 miles from Manchester City Centre.

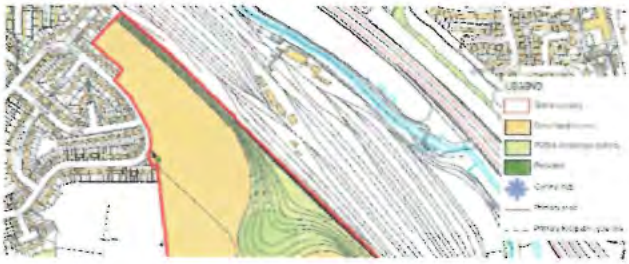
DESCRIPTION

Total size of all sites is 226 acres and all are in agricultural use, and let to tenants. Three sites covering 72 acres are being actively promoted.

CURRENT STATUS

The land has been owned for a number of years. The sites are in the green belt but adjacent to the settlement. Part of the Local Plan review includes a green belt assessment through which the sites will be robustly argued as suitable for release and allocation for residential development.

STRATEGIC LAND & DEVELOPMENT PROJECTS



Appendix G

Updated – version 5 (May 2019)

Assessment of the St Helen's Local Plan and Green Belt Review

A report on behalf of the residents/owners of the French Fields development, Clock Face January 2017 and May 2019

Version history:

V1 Submitted January 2017

V2 Re-submitted January 2017 with minor orientation corrections

V3 March 2019:

a) Cover page, and Foreword and Additions for the March/May 2019 representation added

V4 March 2019: Formatting and proofing corrections

V5 May 2019:

a) Updated to refer to records from Merseyside Bio-Bank and to include the citation for LWS_108

b) Updated to include results and observations from a Phase 1 habitat and bat transect surveys – added as Appendix

c) Added maps to show the differences in land parcel labelling as an Appendix. This is to assist in the reading of this report as land parcel labels have changed completely.

Author: Glenys McBain, BSc (Hons)

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.

1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat.
This is significant.

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.

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.

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:

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change.

5.2. The AAP recognises that *"There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."*

- However, these properties surround and/or are part of GBP_074/HA4.
- Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
- The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.

5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *"Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."*
The AAP itself points out that the local community and visiting public want the ambience of the open countryside.*"3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park..."*

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it "...has a strong boundary to the east ..." "...includes old coal mining buildings..." "...and a new development..."

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer's side of the footpath, there is a ditch.

- The derelict coal mining buildings (an eyesore that had been used by light industry for several years before being abandoned) were demolished in March 2015 to make way for the new development referred to in the reports – that of French Fields. The first foundations were laid in the second half of 2015.
  They do not detract from the openness of the Green Belt.
- The council's reports imply that the new development was an extra new build on green-field land – not reuse of the brownfield site. In fact planning was refused for the application to develop the green-field half of the owner's land.
- The new development (French Fields) is one of the five national case studies as part of the government's home building fund.
  https://www.gov.uk/government/publications/home-building-fund-developer-case-studies

6.3. The community that is directly affected by the removal of HA4 from the Green Belt – and its subsequent development - is predominantly rural, bounded by rural land, industry and a few residential areas that are classed as part of one of the most deprived areas in the UK.
The visiting public who have expectations from the Bold Forest Park are also significantly affected.
Thus the number of respondents and representations will be low.

6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.

6.3.2. At least one large property developer has procured a part of the land within HA4 already and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. The NPPF encourages the active engagement of such developers in such a way - also with agreements in principle.

6.3.3. This seems to make the process unreasonable and unfair.

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of 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.

2. Draft Green Belt Review (GBR) 2016:

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The GBR scored each parcel against the Level of Significance of its Green Belt function <u>for purposes 1, 2 and 3 only</u> at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are "*... not necessarily inappropriate or irrelevant*" (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

<u>Confusing and inaccurate identification:</u>

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).
2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, **thus giving rise to it remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps, is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has concluded (as have many councils' LAPs) that the aging population will shift housing needs from family accommodation to more care homes and easily accessible housing for small or single person households. The majority of the land in Location 21/HS03 would not be suitable for development for this type of housing based on accessibility alone.

It is also difficult to justify removing the protection of Green Belt status now for potential future housing needs where so many of the socio-economic dependencies are in flux due to the effects of the wider political environment.

3.3 Meeting the requirements for Sustainability and/or Suitability for Development:

The NPPF requires that land identified for removal from the Green Belt is capable of being developed. There are numerous reasons that indicate Location 21/HS03 does not meet these requirements.

3.3.1 Protection against climate change/flood risk:

1. Much of the land within Location 21/HS03 is intersected with drains, small ponds and sinks (St. Helens Strategic Flood Risk Assessment (SFRA) 2014), most especially the land to the west of the bridleways SN||311 and SN||312, which bisect the location from north west to south east .
2. This has a significant impact on any development as increased hard landscaping would increase flood risk for existing properties and road networks that surround it as well as affecting new.
3. The level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP) would make development untenable.
4. Even though the SFRA identified multiple areas within Location 21/HS03 as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels in Location 21 in the GBR.

3.3.2 Ecology, Habitat and Biodiversity:

1. **Hedgerows** – including part of the old Parish boundary on SN||307 – are precious resources and should be preserved and enhanced to encourage biodiversity. The western portion of Location 21/HS03 retains many of its hedgerows and the French Fields development has enhanced this network by planting new native hedging around its perimeter.
2. **LWS_108:** No case has been made to remove LWS_108 from the Green Belt, nor should it be, as it cannot be classed as development land for flood risk and ecological reasons.
3. Removing HS03 from the Green Belt would result in **LWS_108** becoming isolated, which is not a good outcome. It is suggested that not only does retaining the Green Belt at Location 21/HS03 creates a green corridor to the LWS from Clock Face Country Park, but also enhances its viability.
4. **Protecting UK Priority Species and Habitats**: During 2016, several breeding pairs of skylarks (Alauda arvensis) were witnessed in GBS_051. In addition, lapwings (Vanellus vanellus) were witnessed as nesting in GBS_120. Both of these are protected UK Priority Species.

5. **The NBN Gateway** shows that corn bunting (Emberiza calandra), skylark, lapwing, brown hare (Lepus europaeus) and great crested newt (Triturus cristatus) have been recorded in the vicinity of Location 21/HS03. It is fair to assume these UK Priority Species could be encouraged to flourish with proper management of the sites within Location 21/HS03. There are many records of urban birds in nearby Clock Face and three species of bat in the Country Park area.
6. There is no evidence of **Phase 1 Habitat survey data** beyond 2001 being used to assess the ecology within the whole LAP. As much has changed since then, it would be sensible to have these carried out on the parcels in Location 21. The habitats and findings to date would indicate that several UK Priority Species could be present.
7. Mitigation techniques for dealing with UK Priority Species and Habitats found, would again render development of the land for much of Location 21/HS03 as untenable, at the very least to the west of the bisecting bridleways.
8. From these findings alone, it could be argued that, at the very least, the area of Location 21/HS03 to the west of the bisecting bridleways should be managed as part of a mosaic habitat, providing habitats suitable for Priority Species (including undisturbed land) and linking across to the rest of the Green Belt. Extending the Bold Forest Park woodland by planting trees in [parts of] GBS_051 and/or GBS_120 could also be valid approach. This would give a belt of woodland across from the Country Park to the woodland in LWS_108. Any of these solutions allow a connecting green corridor to and from Clock Face Country Park.
9. This area is part of the Bold Forest Park and Mersey Forest initiatives and the Council has obligations to those.

3.3.3 Access to open spaces:

1. Location 21/HS03 is bisected south west to north east by the main footpath running along the parish boundary SN||308; has several other footpaths linking to this, SN||307, SN||314, SN||315 and SN||316; and bridleways that bisect the site from north west to south east, SN||311 and SN||312. These public rights of way give access to each of the surrounding settlements, to the Clock Face Country Park and wider countryside without needing to use the car. This is a key strategic aim in the LAP.
2. Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by this open countryside. It helps to create the ambiance of tranquillity before visitors enter the Park.

3.3.4 Other significant factors:

1. If Location 21/HS03 is removed from the Green Belt, it will amalgamate several settlements: Clock Face, Sutton Leach, Sutton, New Bold, Bold and Abbeyfield. This contravenes Purpose 2 of the Green belt Review.
2. The rural infrastructure (rural roads; Green Belt border to one side, intermittent housing on the other; lack of public transport, power and water) in the Gorsey Lane vicinity means it is not able to cope with additional population or traffic needs if any development for Location 21/HS103 is put forward.
3. The double line of electricity pylons running along the north western border of Location 21/HS03 will require space around them for maintenance access. They also influence the viability of development land around them.
4. As this is the area with heaviest pollution (noise and air quality, mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4. Conclusion/alternatives:

4.1 Option 1

The area identified as Location 21 in the GBR (with the possible exception of the area identified as HA6 in the LAP) should be reviewed as a whole (preferred option and stated as such at stage 4 of the GBR) **but absolutely should not be removed from Green Belt status, for the reasons defined above**. This would mitigate, to some extent, the removal of allocated employment land identified as EA1 (Appendix 15, LAP), and proposed safeguarded employment land identified as ES-01 and ES-02 (Appendix 16, LAP), from the south eastern area of the St Helen's Green Belt bordering the M62. This was identified as a necessary strategic requirement in the Employment Needs Study 2015 and the AECOM Local Plan Economic Evidence Base Paper (2015).

Much of the new housing allocation predictions are through expectations of housing requirements from the new employment. However, as the main allocation in question is at the south eastern edge of the Green Belt, and is along the M62 corridor on the very edge of the Warrington boundary (actually increasing sprawl), it is highly likely that much of the housing demand will be outside the St Helens jurisdiction.

A disproportionate amount of land is proposed to be removed from Green Belt in the southern area as opposed to other areas of the St Helens Green Belt, despite that going against the Bold Forest Park AAP and the Mersey Forest initiative. This area is integral to these initiatives, which the LAP states will not be affected. This will have a greatly detrimental impact on the landscape character of the area. In addition, the AAP makes recommendations to improve this area.

Removal of these areas of Green Belt significantly reduces the strategic gap between large towns of St Helens and Warrington.

Once these sites are removed from Green Belt, they will not be returned to it - so beyond 2034 they will not be protected. This is a dangerous proposition for such important land on a statistical projection rather than facts.

4.2 Option 2

As half of the parcel of land identified as GBS_119 in the GBR has been designated for removal from the Green Belt with immediate effect (HA6 in Appendix 11 of the LAP), and if there is a real perceived need for safeguarded housing allocation land AT THIS TIME, notwithstanding the other considerations, then an alternative compromise option could be considered.

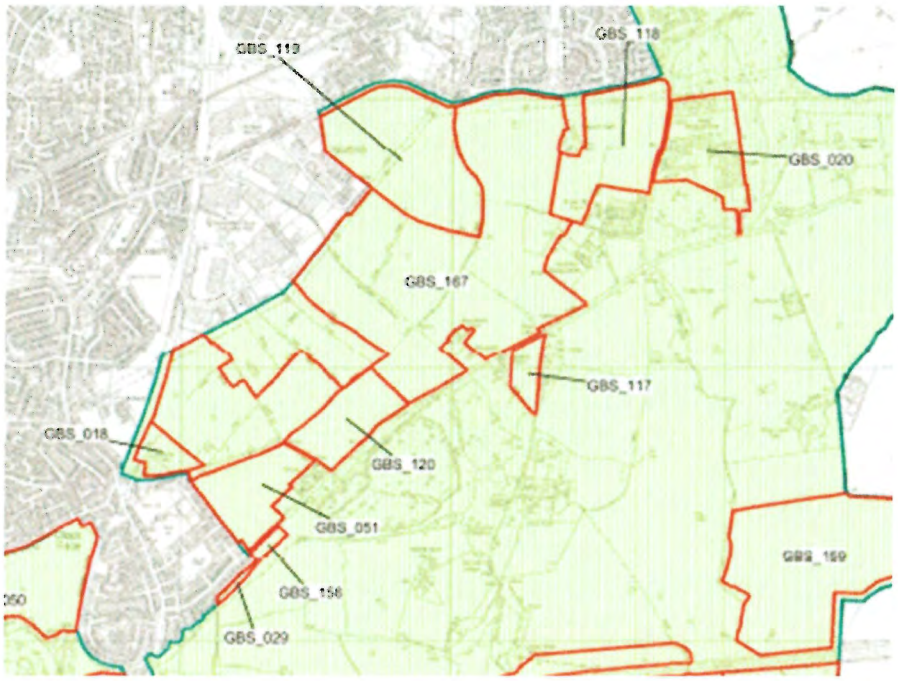
Parcels GBS_ 118, the remaining half of GBS_119 and the most north easterly parcel of GBS_162 in Location 21 could be examined independently as to their viability for development. If viable, these parcels could then be removed from the Green Belt into Safeguarded land, **leaving the remaining land within the Green Belt.**

This approach could be justified as:

1. There is a distinct and identifiable boundary for these parcels together - Reginald Road Industrial estate; B5204; Neills Road; footpath SN||315 and the drain edging the south of GBS_119.
2. These parcels are close to all required sustainable infrastructure (rail, road networks, power and water).
3. Easy access to public transport.

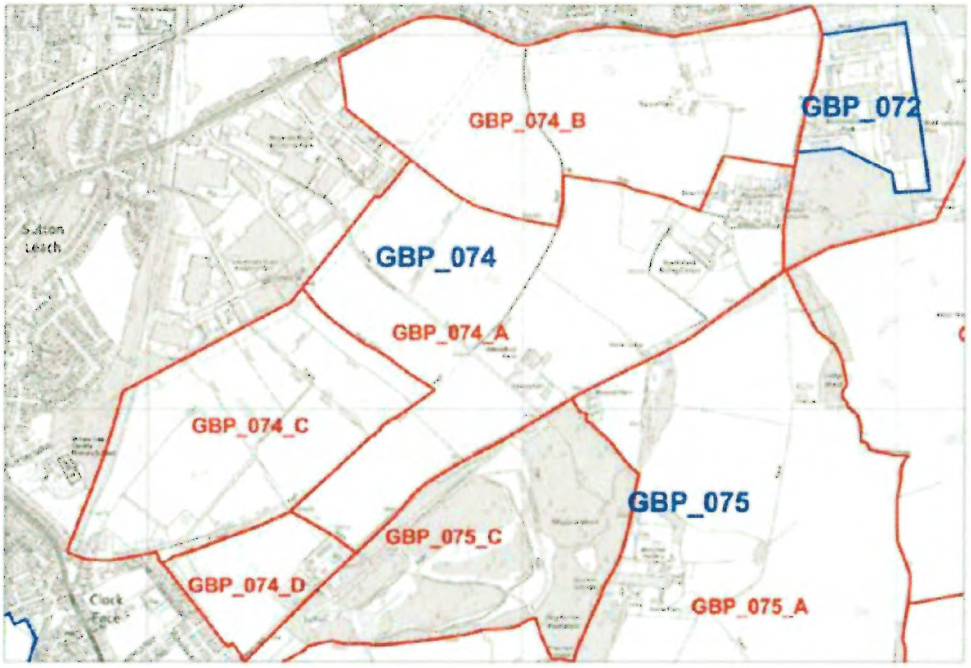
4. These parcels directly abut the B5204 and have no buildings close to the road on that boundary. Thus road networks are in place to deal with the volume of new traffic and can easily be adapted or extended to provide new access points to these land parcels.
5. Much less impact on combining settlements as fewer affected;
6. Many fewer watercourses, thus not as great, and therefore more manageable, impact on the ecology, climate change control and flood risk.
7. Retains a clear and simple boundary for the Green Belt and would not be classed as sprawl.
8. Retains much of the land to use for enhancing the landscape and environment, allowing the Council to meet many of their obligations in the Bold Forest Park AAP.
9. Retains the open landscape and green infrastructure, providing easy access between communities by existing footpaths and bridleways.
10. Addresses the potential isolation of LWS_108 and realistically retains it in the Green Belt.
11. Addresses many of the concerns identified in Option 1.

Appendix 1 – Maps of land parcels label changes between the 2016 proposals and the 2019 submission draft - to assist in the reading of this report



Above -
Detailed land parcels and sub-parcels in Location 21 – from promoted sites map 2016

And below:
Detailed land parcels and sub-parcels for GBP_074 from Page 345 of the Green Belt Review 2018



PO3781

(1) - LPA05 (2) - Green Belt Review 2018

Representor Details

Web Reference Number	WF0491
Type of Submission	Web submission
Full Name	Mr Paul Webster
Organisation	
Address	41 Makerfield Drive Newton le Willows Merseyside Wa129wa
Agent Details	

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

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

Policy	St Helens Borough Local plan 2030-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
The use of Brown land and inner town development areas has not been explored. The scoring system to justify the use of Greenbelt land is biased and planned to to achieve its aims of use. I believe the plan goes against Government guidelines. (2)
There are no details of how affordable homes will be made available and is an exercise in how the local authority can benefit from selling Greenbelt to developers. The authority has failed to delivery past agreements as with the Labd fill site on Vista road. The agreed closure was extended as there was not enough waste in our land. (1)

7. Please set out modification(s) you consider are necessary
I would like details of the development of the land with details of how the Borough will safeguard road congestion, air pollution, provide affordable housing. How this is in line with Government policy. The area has already been developed as Land fill and further use of Greenbelt is excessive.

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	1/18/2019 7:11:51 PM

PO3782

(402)

Ref: LPSD

11 MAR 2019

(For official use only)

St.Helens Council

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

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

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

This form has two parts;

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

PART A - YOUR DETAILS

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

1. Your Details
(we will correspond via your agent)

Title: MR + MRS

First Name: JOHN + JUNE

Last Name: BLUCK

Organisation/company: —

Address: 58 AVON RD
BILLINGE

Postcode: WN5 7QU

[redacted]

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: [redacted] Date: 7th MARCH 2019

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

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

☐ Yes (via email) ☑ No

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

[1] view at http:/www.legislation.gov.uk/ukpga/2004/5/contents

RETURN DETAILS

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

post to:	**Local Plan** **St.Helens Council** **Town Hall** **Victoria Square** **St Helens** **WA10 1HP**
or by hand delivery to:	Ground Floor Reception St.Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)
or by email to:	planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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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: **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 Regulations Assessment	
Other documents (please name document and relevant part/section)	RE:- AC06 GREEN BELT REVIEW DOCUMENT								

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.

SEE ADDITIONAL COMMENTS ATTACHED

Please continue on a separate sheet if necessary

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

REMOVAL OF AC06 FROM THE LOCAL PLAN / GREEN BELT REVIEW. ALTOGETHER.

REFER TO REASONS IN PART 6. (PREVIOUS PAGE)

THE KEY POINTS ARE:-

- NO EXCEPTIONAL CIRCUMSTANCES
- NO NECESSITY
- THE BOUNDARY IS PERMANENT AND CORRECT (FOLLOWING THE ROAD) - THERE IS NO ANOMOLY.

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.

6.

This local plan is unsound and not lawful for the following reasons:

No Exceptional Circumstances

There are No Exceptional Circumstances to justify the revision of the green belt boundary line. Modifications for the sake of it are simply not allowed. There is no development proposal submitted therefore no amendment can be made. **It is not up to the local authority to decide where the green belt boundary should go, it has already been decided** – only exceptional circumstances merit this and there is nowhere in this document or in the comments made by the local authority that could be considered a justification. **There must be a necessity**. This has not been demonstrated. General Planning policies and the preparation of the local plan are not enough in themselves to merit 'exceptional circumstances.' To change the green belt boundary in these circumstances would be wrong as it would not comply with the NPPF.

Existing Boundary Line

It is clear that the existing boundary line follows the pattern of the road. The house at no .81 has the boundary line behind their property – there is open land- i.e Barrows Farm next to this. The greenbelt boundary line was never going to run through open land when it was set, it has come down to the road. This is the most appropriate visible and credible feature to use as the boundary follows the pattern of the road. It picks up the rear of the properties further down the road. This was and still is the most appropriate visible and credible feature to use. No error was made when the boundary line was set. Barrows Farm is a farm site –it is rightfully wholly in the greenbelt. There is no anomaly. There were two later properties built but would have been subject to green belt planning policy so this is not an issue- they were planned in the greenbelt and have stood in the greenbelt for years. Why try to change the boundary now without a reason with would not be considered an 'exceptional circumstance' – It makes no sense. If The local authority planning officials now simply disagree where the boundary should be then this in itself does not mean that they can propose a change based on what they now believe to be correct. The boundary is meant to be permanent and enduring and not to be changed on a whim.

Openness

If amended then development is more likely. Enclosure of the land is therefore more likely. There has been permitted development in the form of a change of use of agricultural buildings at Barrows Farm (which is acceptable on such sites) however the site retains openness. The footprint is the same. As one of the key features of the Green Belt is its openness, to remove that from part of a wider farm site will cause harm to this and the neighbouring green belt land. Urban development not subject to the same planning criteria on the same site and neighbouring sites would be inappropriate

Public Access

The public access path is in the green belt which leads to the wider countryside (also green belt) is in the area proposed to be removed from the greenbelt and this is concerning as it could limit accessibility to local residents who enjoy leisure time in the area, particularly walkers [redacted]

Residential Dwellings

As part of a wider Farm site, Barrows Farm should remain in the Greenbelt, that is appropriate. The other two properties situated in the Green Belt would not be adversely affected by remaining in the Greenbelt -The decision would not impact them, they would be in the same position with no detriment. There is no need to revise the boundary around them. Why bother?

The other two properties may however suffer a detriment if part of Barrows Farm were removed as development could happen directly behind their houses which is not subject to green belt policy, yet all the other residential dwellings on the same side of Carr Mill Road in the immediate area would be subject to Green Belt Policies should development be proposed directly at the rear of their properties. This would seem very unfair, particularly as there is no actual need to re draw the boundary at all.

Retrospective Planning applications

The council cannot claim that part of the site at Barrows Farm is an anomaly. They are aware of what is there having approved various retrospective application that were deemed not inappropriate in the greenbelt. As it was deemed appropriate for the green belt in recent years, it should certainly not be removed now as nothing has changed.

Traffic Issues

There have been long standing issues regarding traffic in this area both in terms of volume and highway safety. If the boundary is changed and development is more likely then this problem could get worse in time.

Overall, for the reasons given the plan does not meet the NPPF and is unsound. The harm caused by such a proposal would significantly outweigh any perceived benefit.

It is difficult to ascertain why the council have even contemplated a boundary review in light of the fact there is no development planned. There appear to be no realistic arguments to justify any boundary change in law or in accordance with the NPPF. It shows poor reasoning and judgement and a lack of comprehension of policy.

What will happen when the next local plan is drafted, will it be changed again? What reason will be given next time? Will we have an ever diminishing Green Belt boundary in St Helens based on unsupported opinions of where the actual boundary should be?

I would also like to comment on the lack of publicity in specific regards to the residents of Billinge. Many of our residents are elderly, have no internet access and will not be aware of the Local Plan and how this will affect their local area. This is largely due to the fact that they do not receive the free local newspaper – the St Helens Star to keep them updated on local news and events. Other areas of St Helens receive this however most Billinge residents do not. The nearest Roadshow event was in Garswood and not accessible to most Billinge Residents directly by public transport.

PO3783

SITE ACCB

PF0862

① GBR (2018)
② LPPO REPORT OF CONSULTATION (2018)
③ GENERAL - LPSD - LPA05

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

13 MAY 2019

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: SIAN	First name:
Last Name: HOWARD	Last Name:
Organisation/company:	Organisation/company:
Address: 65 CARR MILL RD BILLINGE WIGAN	Address:
Postcode: WN5 7TX	Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] Date: 12/5/19

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

or by hand delivery to:

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

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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.

12/5/2019

johnsia.. vard@hotmail.co.uk

Representation' to the 'Independent Inspector' of the St. Helens 'Local Plan' focusing upon the proposed removal of 'Site AC06' from its current Green Belt designation.

St. Helens Council Cabinet's report of 12/12/18 recognised (2.8) that ***'The new Local Plan must, before being adopted by the Council, be found to be legally compliant and sound by the Government Inspector'.*** The St. Helens Plan does not meet the legal requirements under section 20(5a) of The Planning and Compulsory Purchase Act of 2004. That section states that the purpose of an independent examination is to determine in respect of the development plan document – (a) whether it satisfies the requirements of sections 17(7), 19 and 24(1) plus any regulations under section 36 relating to the preparation of Development Plan documents.

Section 19 (2) states that *'in preparing a local development document the local planning authority must have regard to – (a) national policies and advice contained in guidance issued by the Secretary of State'*

Section 19 (3) states '*the authority must also comply with their statement of community involvement'*

Section 36 (2c) refers to '*requirements about the giving of notice and publicity* (2e) *'the nature and extent of consultation with and participation by the public* (2f) *'the making of representations about any matter to be included in a local development document'* (2g) *'consideration of any such representations'.*

For the reasons given below the St. Helens Local Plan requires 'modification' with Site AC06 (Barrows Farm, Carr Mill Road, WN57TX) retaining its current Green Belt designation as the Local Plan presented to the Inspectorate is not legally compliant and sound regarding the re-designation of site AC06 in particular. The Green Belt boundary is currently defined by Carr Mill Road which is a 'strong' permanent boundary. Legislation states that such a boundary can be moved only in 'exceptional circumstances' and none exist. The reason given by the Council is that there is an anomaly, hence site ref AC06 (Anomaly Correction), there is no anomaly! To re-designate Site AC06 would contravene Section 19(2a) of the 2004 Act.

Page 14 of the document titled 'St Helens Borough Local Plan 2020 – 2035 Green Belt review December 2018' defines permanent roads as *'Strong'* boundary features and Carr Mill Road is the current boundary, it would be contradictory to move the boundary line to what that document states would be a *'less strong boundary feature'* of garden fences as is being proposed.

Page 152 of the same document has a heading 'Correction of Green Belt Anomalies', section 6.5 states *'the opportunity has been taken to identify other (mainly small) areas where corrections are required to the existing Green Belt boundary. These are mainly areas where the boundary needs to be rationalised for example where it does not follow readily identifiable features on the ground* ..... 'Section 6.6 continued *'Therefore, it is recommended that a number of further minor adjustments are made to the existing boundary, some of which require small areas to be released from the Green Belt to create a more robust and justifiable boundary. These adjustments are listed in Table 6.1 and illustrated on the plans at Appendix 1'*

Reference to Barrows Farm, was hidden away in the Appendix of the Draft Local Plan. Initially identified as 'Location 10' it became Site AC06. The reason stated for moving the boundary line at this location is *'The current Green Belt boundary includes a number of dwellings and business outlets in this location, and follows no visible boundary on the ground. As the site is already significantly developed, it is recommended that the Green Belt boundary be realigned to follow the rear of the existing outbuildings'.*

Carr Mill Road (the current boundary) is very visible! There is no mention of removing a significant parcel of land from the Green Belt, the wording suggests only a movement of the boundary line and reference to the map located elsewhere is required to understand the full impact of what is proposed. **This could be**

interpreted as being a deliberate intention to mislead in contravention of Section 36(2c) of the 2004 Act. That the Council has permitted new development for an equestrian business, stable blocks etc. (all since converted for a variety of commercial purposes) on Green Belt land does not justify removing that parcel of land from its current status and so facilitate yet more inappropriate development.

Representations by residents regarding Site AC06 were not presented for consideration by the Council before it voted in December 2018 to accept the 'The Local Plan'. The 437 page document titled 'Local Plan Preferred Options – Report of Consultation – December 2018' makes no reference to the representations opposing the removal of a parcel of land from the Green Belt at Barrows Farm and therefore 'due process' has not been followed, such procedure contravenes Section 19(3) and Sections 36(2e,f,g) of the 2004 Act. The December vote relating to Site AC06 is therefore illegal and the St. Helens Local Plan requires modification. The Council has not adhered to the standards laid down in its 'Statement of Community Involvement' and as stated in Section 3.2 of that document failure to do so *'In the case of DPD's failure to meet the required standard, as set out in the SCI, will affect the soundness of the document'*. I request that the Inspector exercises his or her right and accesses the 'representations' that the Planning Department dismissed. When questioned about the lack of disclosure to the Councillors charged with the responsibility of accepting or rejecting the local plan a senior representative of the Planning Department stated in an e-mail *'the matter was not considered a 'main issue' such that the representations made were not included in the report'*.

The Council's 'Statement of Community Involvement' published 2013 in section 3.12 lays down '*a Code of Consultation'*. Several principles are stated including '*Clearly present relevant information and encourage informed opinion .....Be well targeted .... Be well planned'* section 3.13 recognises that the 2007 'Local Government and Public Involvement in Health Act 2007 '*established a statutory duty on local authorities ...to inform, consult and involve local people'* concluding in Section 4 that *'The Council will ensure that all sections of the community and stakeholders are aware of, and have the opportunity to influence, the Local Development Framework'* to achieve that aim the Council promised to pursue six objectives including raising awareness, encouraging public involvement and ensuring public access to help and advice.

St. Helens Council failed to honour such pledges before voting accept the Local Plan. Few members of the public were aware that they were being consulted regarding '*which sites – in urban areas and the Green Belt – should be developed or protected'* (p.25 St. Helens First, Spring 2016). The consultation document was confusingly titled 'St. Helens Local Plan Scoping Consultation Document' rather than 'Planning Policy and the Re-designation of Green Belt land throughout St. Helens: Consultation Document'. The community magazine circulated to every household had a short article on page 25 alongside five other unrelated articles and some information was published in the legal notices of the local press.

As stated above, those members of the public who did submit 'representations' regarding Site AC06 during the consultation period did not have their submissions 'disclosed' to those charged with making decisions. The Planning Department provided only a 'summary' of what it considered the 'main issues' in its 437 page 'report of Consultation'. Such an undemocratic process is obviously open to abuse and has been abused there being no reference to Site AC06 in the Council's 'Report of Consultation', there may well be other locations in the Borough. The systemic failure of the consultation process regarding the St. Helens Local Plan has been recognised in that the deadline for submissions to the Inspectorate regarding the 'Plan' had to be extended from March 13th to May 13th. The 'recommended' format for 'representations' and the 'guidance notes' seem designed to discourage response particularly the request that each observation/representation be individually submitted on separate Form B's accompanied by other bureaucracy. This respondent has opted for this more traditional method which is my right.

I recognise that the 'Local Plan' now accepted by St Helens Council cannot be altered before being presented for ratification by the Government Inspector. I accept that the Inspector will not be considering whether the 'Local Plan' is a good plan for the different communities within the Borough, that responsibility fell to the Council having consulted with the residents in theory but not practice. Page 10 of the Council's document –'Frequently Asked Questions' states that the criteria to be used by the Inspectorate is *'to decide*

if the Plan meets requirements set out by the Government'. The Government wants land to be released for development, the Local Plan satisfies that criteria and is therefore likely to be sanctioned by the Inspector. However, **the Inspectorate states in its documentation that the 'Housing Needs' projections of the 'Office of National Statistics' are *'the accepted figure and soundly based'*.** St. Helens Council made no reference to the household projections published by the ONS on Dec 3rd 2018. Table 406 shows St. Helens (area code E08000013) as having 80,000 households in 2020 projected to rise to 86,000 in 2041, an increase of 6000 households over twenty one years, an average annual increase of 286 households. The initial Local Plan set a 570 'new build' figure later reduced to 486. I request that the Inspector reflects upon the ONS projections and the 'soundness' of the Local Plan as presented given the ONS projections.

The Borough's remaining Green Belt needs to be saved from unnecessary development in order to retain what is left of the Green Belt for the benefit of the residents and visitors. If the 'Local Plan' is sanctioned unmodified St. Helens would in my opinion be destined to become a dormer suburb of Liverpool and lose its individual identity. The Planning Department's commitment to Green Belt principles across the Borough is being questioned by many residents. There is much controversy and disquiet regarding the destruction of a huge area of Green Belt Land for warehouses on the outskirts of St. Helens at what was 'Florida Farm'. There are large areas of Brown Field sites close to the town centre that are lying derelict, there are numerous alternatives and housing development close to the town centre would be a valuable contribution to its regeneration. Reference to 'Case Law' such as 'Gallagher Estates v Solihull Ltd (2014) and for the reasons stated above the St. Helens Local Plan presented to the Inspectorate is not 'legally compliant' nor 'sound' without modification.

If the Local Plan is ratified by the Inspectorate without modification with the consequence that a part of Barrows Farm (Site AC06) is removed from Green Belt protection, the landowner at the next review of the 'Local Plan' (3-5yrs) will use that precedent and apply for the re-designation of the rest of the site. The St. Helens Planning Department has in the recent past permitted numerous developments on this Green Belt land including 1109 square metres of steel clad new build (P/1997/0058 and P/2011/0643) with hard-core parking for 44 vehicles for commercial purposes in what many residents believe to be a dereliction of duty with regards road safety and residential/visitor amenity. A file of documentation to substantiate such observation is prepared and will be available for the Inspector to review at leisure should he or she wish to access such documentation from the person making this representation.

A full 'independent' review of the planning history of the Barrows Farm site would be welcomed. 'Conditions' laid down by the authorities have been ignored in subsequent applications eg. P/97/0058 stated that the site *'shall not be used for holding competitions or functions'* the reasons given being *'such would generate a substantial amount of traffic and therefore, detract from the residential amenity of nearby residents and be detrimental to highway and pedestrian safety'*. There is currently a football club training and playing matches and promoting the hire of its indoor & outdoor facilities for parties etc. The current situation is unsafe regarding the infra-structure and unacceptable regarding residential amenity. To move the existing Green Belt boundary and re-designate 'Site AC06' would further add to the issues.

David Lock, currently Vice President of the 'Town and Country Planning Association' writing in the October 2018 edition of 'The Town & Country Planning' magazine observed in the third paragraph of his article titled 'Trustworthy Public Engagement' that *'The public has been smothered in a cloud of fake participation'* concluding in the final paragraph that *'Leadership in Planning should be a power entrusted by the people to transparent and accountable democratic institutions'*. The 2018 'Interim Report of the Raynsford Review of Planning in England' calls for *'A new covenant for community participation'*. David Lock and those participating in the 'Raynsford Review' will find documentation regarding the St. Helens 'Local Plan' and the planning history of the Barrows Farm Site an interesting read! The St. Helens consultation methodology falls well short of such principles and its own 'Statement of Community Involvement'.

The recent Local Council and Parish Council election results proves considerable 'disquiet' regarding the 'St. Helens Local Plan'. I suggest that the Inspector reads an article published 12/5/19 in the St. Helens Star

newspaper which is available online to acquire a much more thorough understand of the issues. Titled 'St. Helens Local Elections: the rise of the Independents'. The journalist Kenny Lomas observes '*What is remarkable is that this co-ordinated effort only began about two months ago. In March, concerned residents formed the Bold and Clock Face Action Group, in response to the publication of the St. Helens local Plan submission draft ....they got the council to re-run a Local Plan publication consultation after informing the council it had failed to notify residents of proposed changes to green belt.* What has happened in Clock Face was replicated in Rainhill another area of St. Helens with 14 Independents elected in a full takeover of the Parish Council and for the first time in 40 years a female Borough Councillor elected as an Independent on the mandate of 'engagement, transparency and accountability.

This 'representation' is focused upon my particular concern that Site AC06 at Barrows farm will be removed from its current Green Belt status if the Local Plan is not 'modified' by the Inspector. I believe that the Inspector would do all the residents of St. Helens across the Borough a huge favour if he or she declared the whole Local Plan to be not 'legally compliant and sound' and so necessitate a new plan to be produced for submission to the electorate.

Yours faithfully [redacted]

Mrs. Sian Howard

PO3784

SITE AC06

PF0863

① - Green Belt Review 2018
② - Local Plan Preferred Options Report of Consultation 2018

Ref: LPSD

(For official use only)

St.Helens Council

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This form has two parts;

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

13 MAY 2019

PART A - YOUR DETAILS

943

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

1. Your Details
(we will correspond via your agent)

Title: MR
First Name: ROBERT
Last Name: GRIMBY
Organisation/company:
Address: 91 CARR MILL ROAD
BILLINGE
Postcode: WN5 7TY
[redacted]

2. Your Agent's Details (if applicable)

Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:

Signature: [redacted] Date: 12.5.19

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

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RETURN DETAILS

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St.Helens Council
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St Helens
WA10 1HP

or by hand delivery to:

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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.

11/05/19

Dear Independent Inspector.

I write to you as a resident [redacted] a boundary with Site AC06 Barrows Farm which is subject to a proposed re-designation from greenbelt in the St. Helens Local Plan.

Firstly, I will start by providing you with a brief history of developments at the farm as a preface to my arguments and hopefully this will give you a base of knowledge with regards to how the Council have previously permitted development on this green belt land and also how they are now utilising this as a reason for reclassification of the land by way of a boundary anomaly.

Barrows Farm's history is predominantly that of a working farm, its history in Billinge reaches back many years and residents have lived harmoniously with this agricultural business on their doorstep. Unfortunately due to reasons I am unaware of the farm was sold and converted into an equine riding centre making use of some of the existing farm buildings and also some new development on site to build stables and an indoor riding arena. I remember the development well as the construction of the new buildings is on the boundary of the farm [redacted] After a few years the riding centre closed its doors and the new owners with objection from local residents opened up a 5 a side football pitch inside of the riding arena, this was later followed by planning applications to build changing rooms and the change of land to use as an outdoor football pitch. The remaining buildings on site have been crudely converted to house small businesses ranging from local builders, exercise and fitness facilities, furniture showrooms and other small businesses. As you can probably imagine these enterprises have had a significant effect on local people and have individually caused different local issues which have been contested by residents over the years. St Helens Council have permitted with one exception a series of 'retrospective' planning applications. The impact upon the community and visitors is significant particularly with regards to road safety and noise, numerous residents believe that the authorities are failing in their duties.

With the brief history of the site in mind I will now explain why I believe the St. Helens Local Plan requires 'modification' with site AC06 retaining its current status as green belt land. As you are aware the attempt to reallocate this land as Brown Belt has only come about due to a so called 'anomaly of boundary'. I have questioned this anomaly from the beginning as I am unsure where this anomaly arises. Further to that I have also consulted the document 'St Helens Borough Local Plan 2020-2035 Green Belt review Dec 2018' which defines roads as strong boundary features. Carr Mill Road is the current boundary, therefore a "strong" and recognisable boundary exists. Page 152 of this document has a heading 'Correction of Green Belt Anomalies'. Within section 6.5 it states that "the opportunity has been taken to identify other (mainly small) areas where corrections are required to the existing Green Belt boundary. These are areas where the boundary needs to be rationalised for example where it does not follow readily identifiable features on the ground". Section 6.6 states that "it is recommended that a number of further minor adjustment are made to the existing boundary, some of which require small areas to be released from the Green Belt to create a more robust and justifiable boundary". 1

I believe that not only have the council incorrectly defined an anomaly of boundary they have also been particularly misleading in the process. Originally this came to light as part of the Draft Local Plan. Reference to Barrows Farm was not contained within the main document but was only given mention within the appendix under the name 'location 10'. The reason for moving the boundary in this document was stated as "The current green belt boundary includes a number of dwellings and 1

[redacted]

business outlets in this location, and follows no visible boundary on the ground. As this site is already significantly developed, it is recommended that the Green Belt boundary be realigned to follow the rear of the existing outbuildings". The Planning Department allowed the very development upon green belt land that it now hopes to be the reason for the reclassification of that land and furthermore reclassify a significant parcel of open land and so lead the way to yet more inappropriate use! 1

Now that I have had time to read and process these documents I am now completely bewildered as to how or why any reclassification of boundary is necessary as I have already stated a strong and immoveable boundary already exists and the new proposed boundary has far less integrity than the one that is currently in place. Legislation states that "a green belt boundary can only be moved in exceptional circumstances" and to use the reference of dwellings existing within the Green Belt as a reason to redefine the boundary is ridiculous particularly when the authorities have permitted the construction of such buildings on land designated green belt. Carr Mill Road has dwellings all along the east boundary and these properties all currently sit within the Green Belt. Any reclassification of green belt land will be a further degradation of the local green belt and further contribute to a prolonged and sustained series of failures by the St Helens council planning office to adhere to the principles of green belt in Billinge and across the borough. The proposal in the Local Plan relating to Site AC06 is not just a shift in a boundary line, it is the reclassification of a large piece of land as Brown Belt, something that the wording about Site AC06 fails to mention or make clear, reference to a map elsewhere in the Appendix is necessary to understand what is proposed and such makes the Planning Department's consultation process "unsound" as it contravenes the principles of the St. Helens "Statement of Community Involvement". The electorate across the borough has registered its disquiet about such green belt issues in both the recent Town Council and Parish Council elections. 1 1

I must also draw the inspector's attention to another failure regarding site AC06 inclusion in the Local Plan. Residents made 'representations' against the reclassification which were not considered before the council voted to accept the 'Local Plan' as the document 'Local Plan Preferred Options-Report of Consultation- Dec 2018' contained absolutely no mention of local residents opposition to the removal of Green Belt land at AC06. I believe that this means the council carried out that vote illegally and that the council has not followed its own 'Statement of Community Involvement'. This is clearly another mistake on the council's part that the inspector should take into account when assessing whether the 'Local Plan' is legal and sound. 2 1

Green Belt land should not be sacrificed in this way. Green Belt should be protected and nurtured at every opportunity, there are alternatives with numerous barren & derelict sites close to the town centre which would be far more suited for development and to help regenerate the town. Further to this I refer to case law such as 'Gallagher Estates v Solihull Ltd' and request that the Government Inspector considers the implications of such case law aware and the legal precedents that would seem to make the proposed re-designation of green belt land at site AC06 not 'legally compliant'. 1

There are many complexities regarding the AC06 site and I request that the Government Inspector visits the location. I believe that will help the inspector understand the issues experienced by residents and visitors alike. One of those issues that has plagued residents since development started at Barrows Farm is traffic. The roads in and out of site AC06 are completely unsuitable for any volume of traffic and this is something that has been exacerbated by the coming and going of travelling football teams and other users of the site as the facilities are hired out for a range of activities, noise is another issue. On Carr Mill Road is a large Primary School and Nursery plus a 1

[redacted]

residential school. Much of Carr Mill Road is in effect a single lane carriageway with substandard footpaths. The Planning Department and Highways Department have recognised the inherent dangers in the past but not in more recent times and in my opinion (and others) are failing in their duty of care. Reclassification of Site AC06 would facilitate yet more inappropriate development and only compound these issues. [redacted] have witnessed first-hand a number of near misses with streams of vehicles departing from the site and heavy goods vehicles making deliveries on a daily basis at a time when parents are negotiating the unsafe road and pavements with young children and prams. There is a very real danger of someone being seriously injured or killed due to the road conditions and the increased volume of traffic. I believe a visit to the location is necessary to gain an appreciation of the issues and hope that a visit from the Inspectorate would initiate a full 'independent' review of the Barrows Farm planning history. (1)

Yours faithfully

Mr. Robert Grundy

[redacted]

12/5/19

PO3785

① Green Belt Review ② - LPAOS
③ - Statement of Community Involvement 2013

PF0864

Ref: LPSD

(For official use only)

St.Helens Council

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This form has two parts;

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

944

13 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	**2. Your Agent's Details (if applicable)**
Title: MR	Title:
First Name: BRIAN	First name:
Last Name: CHESHIRE	Last Name:
Organisation/company:	Organisation/company:
Address: 32 LINGMELL AVENUE	Address:
CLINKHAM WOOD	
ST. HELENS MERSEYSIDE	
Postcode: WA11 7AZ	Postcode:
[redacted]	Tel No:
	Mobile No:
	Email:

Signature: [redacted] Date: 26-3-2019

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	All	Paragraph / diagram / table	All	Policies Map	All	Sustainability Appraisal/ Strategic Environmental Assessment	All	Habitats Regulation Assessment	All
Other documents (please name document and relevant part/section)		St. Helens Revised Statement of Community Involvement 2013 and The Office of National Statistics Household Projections published 3/12/18							

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?	☐ Not so
Justified?	☐ Not so
Effective?	☐ Not so
Consistent with National Policy?	☐ Not so

Formatted Table

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 Local Plan is not legally compliant nor sound. It does not satisfy the 'The Planning Act' of 2004 Section 19(2) as it ignores the 'exceptional need' to move a Green Belt boundary nor does it satisfy 19(3) as in no way didoes the St. Helens Plan consultation procedures complyy with the St. Helens Statement of Community Involvement 2013 and the plan is therefore 'unsound'. The requirements about giving notice and publicity laid down in Section 36(2c) of the 2004 Act have not been complied with hence the closure date for submissions had to be extended by two months. At least one area (Billinge-Site AC06) made 'representations to the Council Planning Dept and no reference was made to those representations in the 'Report of Representations' presented to the Council before they voted to accept the Local Plan, such lack of 'disclosure' contravenes democratic principles and the Borough's own community involvement policy. ~~of 2013.~~ The Council did not make reference to any of the statistics published by the Office of National Statistics on 3/12/18 projecting an annual 'household increase' between 2020 and 2041 of 286 the Local Plan originally had a new build figure of 570 properties a year reduced to 486 still very much in excess of the ONS projection. The Local election results prove that many residents are unhappy with the Local Plan and it needs to be rejected and so enable a legally compliant and sound plan to be devised and presented to the people of St. Helens for true

1

3

2

consultation.

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.

Site AC06 (Barrows Farm, Billinge) needs to retain its current Green Belt classification as there is no anomaly of boundary as is suggested in The Local Plan.
The lack of transparency and issues relating to Site ACO6 may well be replicated across the Borough.
I suggest that the whole Local Plan is declared-not illegal and unsound and so enable a new plan to be written that can be overseen by the residents and their representatives.
The Local election results have been greatly affected by the local issues generated by dissatisfaction with the Local Plan and the newly elected councillors should be given the opportunity to oversee the rewriting a new plan and they would have the residents support in the subsequent implementation rather than the widespread hostility that exists now.
The Inspectorates independent review of the planning decisions within the St. Helens Borough focusing upon the Planning Departments commitment to Green Belt policy and principles would be most welcome.

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*

PO3786

Site 8HS EF0029

St Helens Borough Local Plan 2020-2035 (Submission Draft) - Representation by Pamela Milligan
Pamela Milligan
to:
planningpolicy@sthelens.gov.uk
11/03/2019 21:20
Hide Details
From: Pamela Milligan [redacted]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment

lpsd-representation-formpm110319.doc

(1) - LPA05
(2) - LPA06
(3) - GBR(201
(4) - S.A.
(5) - IDP

Dear Sir/Madam

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

My details:

Pamela Milligan
132 Bleak Hill Road
Windle
St Helens

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

Yours faithfully

Pam Milligan

St.Helens Council

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

Ref: LPSD

(For official use only)

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Part A – 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: N/A
First Name: Pamela	First name:
Last Name: Milligan	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 132 Bleak Hill Road Windle St Helens Postcode: WA10 6DN	Address: Postcode:
Tel No: [redacted]	Tel No:
Mobile No:	Mobile No:
Email: [redacted]	Email:

Signature: [redacted] **Date:** 11.03.19

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes 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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St.Helens
Merseyside
WA10 1HP

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PART B – YOUR REPRESENTATION

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

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

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

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?	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

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

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

I believe that the local plan outlines excessively high aspirational growth rates for housing need which is driven by over optimistic employment forecasts. This is not supported by our documented historical growth trends and these are not appropriately acknowledged, nor is there suitable adjustment for the declining working age population. The local plan growth projection assumes a net inward migration yet the area has a higher than average unemployment level which deserves priority for redress. Realisation of these questionable projections is also heavily dependent upon the performance of the Liverpool super-port and data is should be tempered by the adverse, strident nature of automation in the warehousing and logistics sector. 1

The plan relies heavily upon a web of circular arguments and aggressive economic growth projections which are not robust or transparent enough to justify the aspirational housing targets. Growth scenarios are presented but can be challenged as to whether they are positively prepared, justified and effective because of the selected and mixed methodologies. Statistics used to forecast growth are taken from the LCR SHELMA, published in 2006. I **believe that these factors show the plan to be unsound.** 2

The council have deviated from the standard methodology to inform their local plan's housing need assessment. Housing projections are thus subject to question. There is much ongoing debate about the use of MHCLG 2014 housing figures rather than the use of 2016 ONS figures. This debate continues and our district should not be saddled with an outdated and uplifted projection together with detrimental, yet avoidable consequences, whilst the argument progresses. SHBC have opted to use 2014 data and in doing so have further uplifted the annual figure to 486, rather than applying the standard 468 defined in the 2014 stats. **I believe this shows that the plan is unsound.** 1

Planners could be more prudent by selecting 2016 OAN of 383 which would reflect more realistic demographic and economic projections for St Helens. Interestingly a relatively recent press release from the National Audit Office gives voice to widespread concern against the decision to use 2014 data/methodology.
"...flawed methods for assessing the number of houses required, to the failure to ensure developers contribute fairly for infrastructure, it is clear that the planning system is not working well. The government needs to take this much more seriously and ensure its new planning policies bring about the change that is needed". 1
Amyas Morse, Head of NAO – 08.02.19.

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

I am absolutely opposed to the release of Green Belt land for either industrial or housing development, as identified within this local plan and the Green Belt Review, 2018, primarily because the need for changing the Green Belt boundaries is unequivocally dubious. The local 3

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

NPPF, Paragraph 133 defines Green Belt by 'their openness and permanence' and the latter is indicative of any Green Belt land's worth to a community, namely for health, well-being, flood protection, food-security and wildlife habitats. The release and erosion of Green Belt land is not sustainable. Regions with a higher percentage of Green Belt land are promoted in a positive light as healthier places to live. STHMBC should be intent on maintaining this advantage. The parcel of land **8HS,** offers all of these benefits to both young and old. Hence, it is of far greater value to the borough of St Helens than the brownfield and contaminated sites languishing in and around our town and suburbs, desperately waiting for remediation and a new lease of life which will add value to the town if sympathetically addressed. They can and should play a vital role in revitalising the urban and economic areas. **SHBC purport a Brownfield First policy and whilst there is some progress here there is a long way to go.** 3

SHMBC have published a statement of Contaminated Land (CL) sites, 2015, **indicating that 3,170 ha of the lowest priority contaminated land exists in St Helens. 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need specified in this local plan. This area equates to less than 7% of the 3,170 CL. Surely remediation of 7% (a most paltry target in the term of this plan) would produce far more sustainable and ethical results and contribute to revitalising St Helens**. These areas provide huge potential, if remediated, and SHMBC should look to tighten and implement its policy commensurate with securing funding to this end. **Safeguarded or Green Belt Land is not needed to achieve the objectives of the local plan.** 1

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

"The SIF will support projects that:

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

1

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

There is great importance attached to the role of Green Belt land. Affirmation of this can be found in NPPF, paragraph 138. Here we are told that there should be concern for **sustainable development which harnesses previously developed land first and offers accessibility to public transport**. 3

However, contrary to this advice, the local plan has selected Green Belt, i.e. **8HS** which has many valuable features and properties which contribute to local and regional well-being: 2

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

The Green Belt Review highlights a need for sustainable developments to mitigate existing high levels of net out-commuting from the borough and to avoid further prejudicing the achievement of sustainable patterns of travel. (3)

The geographical location of 8HS will not contribute to the management of these factors. It will undoubtedly exacerbate them because of the close proximity to A580, offering very direct links to Liverpool and Manchester. With net out-commuting also comes an outward loss of spending power. Commuters will shop and socialise at their chosen destination. St Helens, with all due respect, is struggling to compete (on any level) with Liverpool or Manchester – a five minute walk in the town centre would corroborate this, for any interested party. Again therefore, SHMBC will fail to harness spending power within the local economy so that regeneration is even less likely to become self-perpetuating. (2)

SHMBC claims to have policies which could effectively improve our economy and communities and they indeed have a great opportunity to fulfil this but their approach is disjointed and will fail to achieve a blend of preserving and protecting what is good, i.e Green Belt, and remediating and revitalising areas the Brownfield and Contaminated Sites which have been ignored for far too long and can be returned as valuable local assets. (2)

Planning Officers advised Windle residents on 04.03.19 that they were unable to comment on the process for moving 'examined and classified contaminated land' onto the Brownfield Register so that it can be clearly identifiable for future remediation and development allocation.

This is another dubious facet of what should be a tightly controlled process under the auspices of the Brownfield First policy, yet it remains for me to question whether the policy used to optimum effect. It can undoubtedly underpin a seed bed for borough revitalisation that we should exploit to the maximum. News of a high profile glass facility, close to the town centre, is obviously a great example of how this can be done.

The local plan has been informed by findings taken from a commissioned Sustainability Appraisal Report (SAR), January 2019. The publication reveals some skewed results and having looked closely at this report I feel confident, yet perturbed, to advise that there are significant and gaping inconsistencies in the approach that has been adopted, particularly in respect of data analysis and
portrayal of the respective indicators for the Safeguarded sites. This has resulted in subjective scoring and findings. Scrutiny of the report reveals:- (4)

Table 6.2 offers positive and negative ratings for the respective parcels of land. **8HS has 5 negative indicators which is more than other sites. 2 parcels had 5 negative indicators; 1 was discarded and 8HS was safeguarded.**

Additionally 4 parcels showed 4 negative indicators yet 3 were discarded and 1 was allocated. **The rationale for safeguarding 1 parcel with 5 negative indicators whilst discarding 3 parcels with only 4 negative indicators must be questioned**.

Overall there are 9 parcels with 3 negative indicators resulting in 1 safeguarded; 1 allocated and 7 discarded. **So, how and why was 8HS safeguarded when it had 5 negative indicators? I am left to conclude therefore that the exercise was subjective in part; that a form of pre-selection is inherent and subsequently this shows that the document is not positively prepared and there has not been an effective process.** (4)

Retain all Green Belt areas for the future well-being of St Helens communities.

The Brownfield First and Contaminated Land Policies should be strengthened and prioritised so that previously used sites can be redeveloped for the good of the community. We have excellent examples of how this has been done and should continue.

The Council should take steps to rebuff approaches by prospective developers (namely Story Homes in the case of 8HS) since their proposals are contrary to the well -being of the existing communities.

I agree with the representations made by ECRA and SHGBA.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consi doneder 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.

Change 8HS from Safeguarded land and maintain its Green Belt status so that the local plan will no longer be open to criticisms of failing to be positively prepared; failing to be justified; failing to be effective and failing to be consistent with national policy (namely NPPF 2019).

Retain and protect all Green Belt areas for the benefit of St Helens people now and in the future.
Remediate and redevelop brownfield sites. Use examples of best practice in the borough and elsewhere in the country to optimise the regeneration that is needed.

Prevent house builders from land banking and curtail the temptation for councillors to look towards council tax revenue from the Green Belt, rather than promoting sustainable developments near to our town and transport hubs.

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		

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.

PO3787

(1) - Green Belt Review 2018 (3) - LPA05 (5) - IDP
(2) - LPA06, 8HS (4) - GEN (6) - Para 1.7.2 EF0037 DTC

Response to Local Plan 2019
Peter & Frances Murphy
to:
planningpolicy
12/03/2019 13:05

[redacted]

1 Attachment

MFM lpsd-representation-form Example 1.doc

Dear Sir/Madam

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

Yours sincerely

MF Murphy

St.Helens Council

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

Ref: LPSD

(For official use only)

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

Signature:	[redacted]	**Date:**	12/03/2019

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

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

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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	Nox ☐x
Sound?	Yes ☐	No x☐x
Complies with the Duty to Cooperate	Yes ☐	Nox ☐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☐No The Plan is based on flawed methodology
Effective?	x☐No The Plan is not deliverable
Consistent with National Policy?	☐No It does not comply with NPPF 2018

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

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

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

1

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prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified. 3

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective. 4

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared. 3

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified. 2

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective. 5

The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West. 6

Please continue on a separate sheet if necessary

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.
Adopt the ONS (2018) Housing Need statistics and remove all Green Belt reallocation from the Plan. 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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PO3788

① - Green Belt Review 2018 ③ - LPA05 ⑤ - IDP
② - LPA06, 8HS ④ - GEN ⑥ - Para 1.7.2 OTC

EF0038

Response to Local Plan 2019
Peter & Frances Murphy
to:
planningpolicy
12/03/2019 13:09

[redacted]

1 Attachment

PM lpsd-representation-form Example 1.doc

Dear Sir/Madam

As a resident and Council Tax payer of Eccleston, I wish to submit the attached response to the Local Plan 2019.

Yours sincerely

P Murphy

St.Helens Council

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

Ref: LPSD

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Part B – Your Representation(s).

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

Signature:	[redacted]	**Date:**	12/03/2019

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

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Yes ☐ (Via Email)	No x☐

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Merseyside
WA10 1HP

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Legally Compliant?	Yes ☐	Nox ☐x
Sound?	Yes ☐	No x☐x
Complies with the Duty to Cooperate	Yes ☐	Nox ☐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*	
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Justified?	x☐No The Plan is based on flawed methodology
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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO3789

Site: GBP_033

EL0009

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

[redacted]

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

2 Attachments

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

Please find attached representations on the Local Plan Submission Draft.

Regards

Andrew

Andrew Windress MA MRTPI
Director

[redacted]

a: 9 York Place, Leeds, LS1 2DS
w: www.idplanning.co.uk

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February 2019

Representations on the St. Helens Borough Local Plan 2020-2035 Submission Draft and the Draft Green Belt Review 2018 with particular reference to land at Haydock Park Racecourse (Previous Local Plan site reference 2015_003).

On behalf of

Jockey Club Racecourses

Prepared by

I D Planning
9 York Place
Leeds
LS1 2DS

5.0 Representations to the Draft Green Belt Review 2018

5.1 In the previous Draft Green Belt Review (2016) the HPR site was assessed on its own as parcel GBS_157. However, in the current Draft Green Belt Review 2018 the site has been incorporated into the much larger parcel (GBP_033) which mostly consists of land forming the proposed safeguarded Site 2ES.

5.2 Combining these parcels has had serious implications on the way in which the HPR site has been assessed in the Draft Green Belt Review 2018. The conclusions, which now apply to a much larger area of land with a markedly different overall character, do not accurately reflect the reality of the HPR site's contribution to the purposes of the Green Belt or its residential development potential.

5.3 As it stands, the HPR site is proposed to be removed from the Green Belt as a consequence of the safeguarding of Site 2ES. This is because the development of Site 2ES would create an isolated 'island' of Green Belt (Ref: CC14) which would serve no Green Belt purpose.

5.4 Whilst we agree with the removal of the HPR site from the Green Belt, it is important to appreciate that the site could be suitably removed on its own merits, irrespective of the nearby safeguarded employment site.

5.5 As established in previous representations, the HPR site has a very limited impact on the purpose and function of the Green Belt. The five purposes of the Green Belt are identified in Paragraph 134 of the NPPF, albeit the Green Belt Review only stresses the following three:

(a) To check the unrestricted sprawl of large built-up areas;
(b) To prevent neighbouring towns merging into one another; and
(c) To assist in safeguarding the countryside from encroachment.

5.6 With respect to these purposes, the site is small, well contained and situated almost 1.5 kilometres from the neighbouring town to the east. Within this gap is Haydock Racecourse, which is largely open and prevents any sprawl, encroachment or merging of nearby towns.

5.7 In terms of the development potential of the site, there are decidedly fewer site-specific constraints than on many other sites which have been taken forward for residential allocation.

5.8 The woodland on the site should be seen as an advantage to the site's development as it will provide an attractive amenity space for future residents, giving a new residential development character and distinction. A tree survey has been carried out and the indicative masterplan provided at Appendix 2 demonstrates that a high-quality development is possible without impacting on existing trees, whilst also including new soft landscaping features.

5.9 Access to the site has been examined in detail during the consideration of development on the HPR site and also a site to the north of the racecourse access road that is being allocated for housing by Wigan Council. The Transport Assessment explores the potential for adoption of the existing access road and changes to the operation of the racecourse, identifying a number of options that would provide a suitable access to a new housing development without adversely affecting the operation of the racecourse. It concludes that there are no transport or highways reasons to prevent the development of the site.

5.10 The site is in single ownership and has good viability. This is something which cannot be said for a number of other draft housing allocations. These sites, which the Council have identified as being less viable, would be less likely to form an attractive proposition to a potential developer and consequently less likely to come forward for development. As required by the NPPF, allocated sites should be both deliverable and developable. This means that they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. It is therefore requested that the Council reconsider the allocation of those sites which are less deliverable and developable than the HPR site.

4

5.11 In accordance with the above, we respectfully request that the removal of the HPR site from the Green Belt be upheld and the site be reconsidered for allocation for housing in the place of other more sensitive and less deliverable Green Belt sites.

PO3790

EL0080

(Case Ref: YF24448) St. Helens Borough Local Plan: Submission Draft.
Yvonne Fovargue
to:
planningpolicy
08/03/2019 15:18

[redacted]

1 Attachment

letter5620.pdf

[redacted]
Development Plans Manager.

Dear [redacted]

Please find attached my comments on St. Helens Borough Local Plan: Submission Draft as it relates to employment development on 4 sites adjoining my constituency of Makerfield.

I would be grateful if you would confirm receipt. Many thanks.

Yours sincerely,

Yvonne Fovargue
Labour Member for Makerfield

(1) - LPA04
(2) - LPA06
(3) - GBR

EL0030

Yvonne Fovargue MP
a: House of Commons
London
SW1A 0AA

[redacted]

[redacted]

Chief Executive
St Helens Council
Gamble Building
Victoria Square
St. Helens
WA10 1DY

Our Ref: LB/YF24448

1 March 2019

Dear [redacted]

St. Helens Borough Local Plan

I wish to object to the St. Helens local plan as it relates to the following proposals:

a) 2ES Land to the East of M6 Jt. 23 Haydock
b) 4EA Land South of Penny Lane, Haydock
c) 6EA Land West of Millfield Lane and South of Liverpool Road.
d) 5EA Land West of Haydock Estate.

My constituency borders these sites and my constituents living in Ashton will be principally affected by the negative aspects of any development.

Haydock Point site 2ES

In December 2016, together with the then MP for Leigh Andy Burnham M.P., I submitted an objection to the planning application (yet to be determined) for a major scheme at 'Haydock Point'. I remain in no doubt that this proposed development would be highly detrimental to the quality of life of my constituents in the Makerfield area and my objection stands.

2

EL0030

Sites 6EA, 5EA, and 4EA

The traffic and air quality points raised in relation to Haydock Point obviously also apply to these three sites. Together with traffic from the Florida Farm development, Junction 23 will struggle to cope with the additional volume of traffic – this must create capacity issues. (1)

You have already approved an employment development application for the currently green belt site 3EA, allowing warehousing/office development and this sits along side the A49. A further adjoining site is proposed, site 4EA, also along side the A49. There is no guarantee that traffic from these two developments will avoid the busy A49 through Ashton and use the A580 for access and egress.

The potential employment development sites adjoining Florida farm, the 5EA and 6EA will also generate a high volume of traffic affecting the East Lancashire Road, junction 23 and the A49. (1)

This additional traffic, together with the traffic from the Haydock Point site, again adjacent the A49, will have an considerable impact on the already poor air quality and traffic congestion at this location. (1)

Green Belt purposes in respect of all four sites, 2ES, 4EA, 6EA and 5EA : The Green Belt status of the land identified, contributes to the divide between out neighbouring communities. It is important that this should be maintained. Without it the communities of Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, a habitat to wildlife, which they currently enjoy. It is just as important and necessary to protect this green space now as it was when the green belt status was first determined.

The removal of Green Belt in these areas to allow employment development will also have the potential to undermine efforts to promote regeneration of brownfield sites elsewhere. Developers will opt for less complex developments that provide a greater return. (2)

I have previously acknowledged that all local authorities desire to maximise their business rates to minimise the impact of the new localisation of business rates which will affect some local authorities adversely but action to address this and ensure economic and employment opportunities should go hand in hand with maintaining the quality of life for all local communities. (1)

E LOOPO

St. Helens Borough Local Plan raises concerns for the quality of life for my constituents living and working in the Ashton area and I do hope you will consider these further observations.

Yours sincerely

Yvonne Fovargue MP
Labour Member for Makerfield

PO3791

Objection to plans to build on Eccleston/Windle Greenbelt land.
Gerard Banks
to:
planningpolicy@sthelens.gov.uk
11/03/2019 09:35
[redacted]

1 Attachment

Planning Objection.pdf

Dear Sir/Madam

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

Kind regards

Gerard Banks
54 Ecclesfield Road
Eccleston
[redacted]

EL0049A.pdf

Mr & Mrs G Banks
54 Ecclesfield Road
Eccleston
St Helens
WA10 6BN
[redacted]

11 March 2019

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

Dear Sir or Madam

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan(2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

[redacted]

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over [redacted] years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on. 01

From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. 02 The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". 03

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land. 04

PO3792

Objection to plans to build on Eccleston/Windle Greenbelt land.
Gerard Banks
to:
planningpolicy@sthelens.gov.uk
11/03/2019 09:35
[redacted]

1 Attachment

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Gerard Banks
54 Ecclesfield Road
Eccleston
[redacted]

EL0049A.pdf

Mr & Mrs G Banks
54 Ecclesfield Road
Eccleston
St Helens
WA10 6BN
[redacted]

11 March 2019

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

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The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land. 04

PO3793

EL0067

1 - IDP
2 - GBR
3 - SA
4 - LPA06
5 - LPA06 TABLE 4-
6 - PARA 1.7.2 - DLC

Local Plan Response
Steve Muskett
to:
planningpolicy@sthelens.gov.uk, Contact Centre
11/03/2019 19:27

[redacted]

1 Attachment

2

LPSD - Submission Document_20190311.pdf

Please find attached my response to the Local Plan.

I would kindly request acknowledgement of this email and receipt/ acceptance of my response to avoid unnecessarily printing and hand delivering to the Town Hall.

Many thanks,

Steve Muskett
12 Hamilton Road
Windle
St Helens
WA10 6HG

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

PART A

Title: MR
First Name: STEVE
Last Name: MUSKETT
Address: 12 HAMILTON ROAD, WINDLE
Postcode: WA10 6HG
[redacted]

Signature: [redacted]	**Date:** 11th March 2019

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

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

2. PART B – GREEN BELT REVIEW

Summary of points, please see "Appendix – B, C, D & E" for detailed analysis

2.1. The LP contains a Green Belt Review document which attempts to measure and score various parcels of land across the borough in an attempt to determine their suitability for removal from GB.

2.2. The scoring mechanism used is entirely subjective.

2.3. The methodology would not stand up to a repeatability and reproducibility (R&R) assessment.

2.4. It seems clear that the parcels of land have been divided amongst council officers for assessment as the resulting scores differ for the same findings.

2.5. If the parcels were to be redistributed and re-assessed, different results would be obtained, thus not passing the R&R test required for any measurement system.

2.6. Whilst the review attempts to portray a sense of their being a level playing field, assessing each parcel individually, those assessments are not applied consistently across the board which has led to inconsistencies in the output.

2.7. You cannot logically reason for one parcel and assign a score, then find those same reasons for a different parcel but assign a different score.

2.8. The Stage 1B pro-forma documents are included in the review document so that they may be critiqued but the Stage 2B pro-forma's which should be in Appendix F are completely missing.

2.9. This absence of those pro-forma means that the output of the GBR cannot be properly evaluated in the consultation; a parcel may be deemed 'medium' for developability but nobody can see how that has been arrived at, nor check again for R&R.

2.10. I can't agree with discounting aim/purpose of GB number 5, the regenerating of derelict land. By ignoring this purpose, the LP is by default adding to the problem of regeneration and not encouraging the recycling and reuse of such land.

2.11. This point was recognised in the LPPO 2016 (Para 4.45 – Alternative Option 3), which reviewed the option to reduce the proportion of Brownfield and increase the amount of GB. It was rejected due to the recognition that developers would favour green sites due to ease of development and would adversely affect brownfield development.

2.12. As part of the SHLAA 2017, the Council recognised small/ windfall sites being able to consistently produce an average of 93 units per annum. This came from robust data over a 10 year period.

2.13. No account of these 93 units per annum has been taken when determining safeguarded land beyond the plan period.

2.14. The time and effort that has been placed into the GBR would have been better served and applied to assessing alternate land.

2.15. In fact, probably only a fraction of the effort placed on reviewing 161 individual GB parcels would have been required to locate just a small percentage of the contaminated land needed to deliver the plan in its current form, even with highly aspirational growth figures.

2.16. Whilst I appreciate and respect the council have tried to devise a suitable scoring mechanism, what it certainly isn't, is an "Is" / "Is-Not" measurement system. There is a significant element of subjectivity and is therefore open to being carried out in a way to suit the end goal you are aiming to achieve.

2.17. The points raised throughout the GBR document clearly show inconsistencies with subjective scoring and findings. It's is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

2

8. Appendix – B – Green Belt Review (General)

8.1. <u>Point 1</u>

8.1.1. The Stage 2B Pro-forma scoring templates do not appear to be present in the Green Belt Review document Appendix F. Stage 2B was the step in the process to assess the development potential of each parcel, with them being considered as 'good', 'medium' or 'limited'.

8.1.2. Paragraph-2.52 states "The *proformas (see Appendix F to this Review) set out a justification for the findings for each parcel/sub-parcel."*

STAGE 2B - OVERALL CONCLUSIONS ON DEVELOPMENT POTENTIAL OF EACH PARCEL/SUB-PARCEL

2.51 As the final part of Stage 2B, the Council identified for each parcel/sub-parcel (taking account of all the earlier findings from this stage):

- overall conclusions concerning developability;
- the Council's preferred use for the parcel/sub-parcel and its notional development capacity (to be considered in Stage 3); and
- whether the parcel/sub-parcel is, in overall terms, considered to have 'good', 'medium' or 'limited' development potential.

2.52 Parcels/sub-parcels with 'good' development potential are those that would be highly likely to come forward for development within the Plan period (before 2035) if they are released from the Green Belt. Those with 'limited' development potential are those where there is substantial uncertainty that this would happen. The proformas (see Appendix F to this Review) set out a justification for the findings for each parcel/sub-parcel.

8.1.3. Appendix F contains no such documents and appears to have been created just as a placeholder for these pro-forma documents, but has then never been populated with the evidence/ justification/ findings for each of the parcels.

8.1.4. It is therefore not possible to review and compare the scoring at Stage 2B across similar sites or verify the validity of the scoring created as part of the Green Belt Review process.

8.1.5. I find this extremely alarming as this forms a fundamental part of the process the council created itself in order to assess land for allocation, safeguarding or to be discounted. They have asked for responses from the public, yet appear to have omitted a significant portion of evidence from their report.

8.1.6. The Stage 1B step does have the completed pro-forma documents in Appendix C as the GBR advises they should be. My response further in this document will critique and question the data within those pro-forma pages.

8.1.7. The absence of these pro-forma begs a question of soundness. Without access to this supporting evidence the council cannot demonstrate justification of the plan. It is based on evidence which has not been presented or verified and therefore cannot be deemed sound.

8.1.8. They are not being transparent in regard to their views of developability.

8.2. Point 2

8.2.1. Paragraph 5.8 details the fifty-six parcels that had not been discounted at Stages 1 or 2 and tabulates them in Table 5.3, as per example below:

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (dwellings)
GBP_001a	Land North of Bushey Lane, east of Rainford Road	Medium	Limited	3	405
GBP_001b	Land North of Bushey Lane, east of Rainford Road	Low	Medium	4	21

8.2.2. As per previous point, I have not been able to review the scoring from Stage 2B, but will analyse the Stage 1B score in this response.

8.2.3. As I see it, each of the plots was given an overall score based on the scores from Stages 1 and 2 using the information outlined in Paragraphs-2.54 and 2.55, as per below:

2.54 To rank the remaining parcels and sub-parcels, the Council firstly attributed a numerical score from their assessment at Stages 1B and 2B. For the Stage 1B findings the following points were attributed:

Overall significance of the parcel/sub-parcel to the 3 Green Belt purposes assessed in the Review	Score attributed
Low	3
Medium	2
High	1
High +	0

2.55 For the Stage 2B findings the following points were attributed:

Overall development potential of the parcel/sub-parcel	Score attributed
Good	3
Medium	2
Limited	1

8.2.4. This overall score was then assigned a 'Tier Number' but that tier number was then never used again beyond Table-2.10.

Question 1

What is the purpose of the Tier Number because the document only ever seems to reference the Overall Score rather than the tier?

8.2.5. Looking at the table and the first parcel with Medium@2 and Limited@1 it is straightforward to see how the overall score=3 is achieved.

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (dwellings)
GBP_001a	Land North of Bushey Lane, east of Rainford Road	Medium	Limited	3	405

8.2.6. When we review the entries for each of the 56 parcels, the following anomalies become apparent.

Parcel/Sub-parcel Ref.	Location	Stage 1B Score	Stage 2B Score	Overall Score	Notional capacity (dwellings)
GBP_001b	Land North of Bushey Lane, east of Rainford Road	Low	Medium	4	21
GBP_005b	Land east of Rainford By-Pass south of railway line	Medium	Medium	3	68
GBP_025a	Land west of Garswood	Medium	Medium	5	291
GBP_070	Land west of Parr and Sutton	Low	Good	3	162

8.2.7. Following the scoring mechanism devised by the council in this LPSD the scoring should be as follows:-

8.2.7.1. GBP_001b: Low@3 + Medium@2 → Overall Score = 5
8.2.7.2. GBP_005b: Medium@2 + Medium@2 → Overall Score = 4
8.2.7.3. GBP_025a: Medium@2 + Medium@2 → Overall Score = 4
8.2.7.4. GBP_070: Low@3 + Good@3 → Overall Score = 6

8.2.8. 4 scoring errors from 56 parcels of land or in other words, that's a 7% error to factor into the reporting from the council on their own scoring methodology.

8.2.9. It would not be unreasonable to suggest that this sort of error percentage would be continued throughout this Local Plan document.

8.2.10. GBP_001b was discounted scoring 4, along with all 13 other parcels scoring 4.
8.2.10.1. All 8 parcels scoring 5 have been safeguarded
8.2.10.2. This parcel should have been the same

8.2.11. GBP_005b was discounted with a score of 4 and would probably remain discounted when scoring 4.

8.2.12. GBP_025a was safeguarded scoring 5, along with all 7 other parcels scoring 5.
8.2.12.1. All 14 parcels scoring 4 have been discounted – this parcel should have been the same

8.2.13. GBP_070 was discounted with a score of 3, along with all 23 other parcels scoring 3.

8.2.13.1. 9 parcels scoring 6 have been allocated with 1 treated as a Green Belt anomaly – this parcel should have been the same

8.2.14. This response does not make a detailed representation of the above parcels but merely documents them here to demonstrate the error factor within the document and the subjective nature in this methodology.

8.2.15. In the absence of a detailed review like this, the cynical mind might be of the view the council has started the process with the parcels they wanted to move forward with and then engineered the numbers to suit accordingly, (or just plain and simple entered the wrong data), hoping the above anomalies would go unnoticed by the general public and 'typical' consultation responses.

8.3. <u>Point 3</u>

8.3.1. Paragraph 2.11 commences the outlining of the purposes of Green Belt designation, the 3 used and the 2 others the Council chose to ignore for the purposes of this review.

8.3.2. I would completely object to the discounting of purpose 5, it appears the council have simply opted to ignore that because "it might be a bit difficult to solve the problems via recycling of derelict and other urban land".

8.3.3. By ignoring this point, the Local Plan by default adds to the problem of regenerating derelict land. There will be a stampede from developers to take the easy option with all the released Green Belt, leaving derelict land behind, therefore not encouraging its re-use.

8.3.4. The Local Plan adds to and encourages the issues of regeneration and therefore cannot be deemed to be a sound plan when it has simply been discounted as a purpose for Green Belt.

8.3.5. This very problem was recognised in the Local Plan Preferred Options 2016.

> 4.45 *Alternative Option 3:* Reduce the proportion of Brownfield land and increase the amount of Green Belt land for housing and employment use. For housing, the focus will be on areas of higher housing value, to increase the likely amount of Affordable Housing being secured due to higher viability of greenfield sites on the edge of the urban area and in areas that are more attractive to housebuilders. For employment land, focus on areas close to motorway junctions.
>
> 4.46 *Reason for rejection:* This approach could lead to less brownfield land being developed as housebuilders favour greenfield sites due to ease of development and higher development values. This would have an adverse impact on development on brownfield land in the core area and in neighbouring authorities.

8.4. Point 4

8.4.1. The Council have not demonstrated that it has fully examined all other reasonable options for meeting its identified development requirements. They have certainly not demonstrated exceptional circumstances which are fully evidenced and justified to remove land from Green Belt protection.

8.4.2. Additionally, the Brownfield Site Register identifies land to accommodate 5808 houses against a need identified in LPSD of 7245, leaving a shortfall of 1437. At the minimum density of 30dph this equates to 48ha of land needing to be identified. I can't any logical reasoning for the addition of 20% to that capacity other than what is stated. Why not 10% or 5%; is this number based on some historical proof of contingencies?

8.4.3. Given that only 48ha is required it seems incredulous that the Local Plan allocates 249.83ha of Green Belt land to housing. It seems further unbelievable that an additional 196ha has been safeguarded for future housing needs.

8.4.4. This again questions the validity of this data and the soundness of the Local Plan that has been created. These are the Councils own figures that simply do not add up.

8.5. Point 5

8.5.1. I do not feel that there has been enough exploration of the Brownfield sites or whether there are new and more cost effective ways to clean up contaminated land. Additionally, since the initial plan of 2016, a number of 'windfall' sites have become available for development. This will surely continue over the duration of this 15 year plan.

8.5.2. Whilst it may be the case the council has a requirement "to meet longer term development needs stretching well beyond the Plan period" by creating safeguarded land, some accommodation should be factored in that there are significant number of brownfield sites in St Helens due to its historical industrial past which are no longer now utilised.

8.5.3. There should therefore be some allowance made for this and as such reduce or eliminate the need to safeguard any greenbelt land for future needs, as it will become available from future windfall sites naturally and by default.

8.6. Point 6

8.6.1. Paragraph 2.11 describes the methodology used in Stage 1B assessment of each parcel against each of a number of the purposes of Green Belt designation. The Review focussed on the first three Green Belt purposes referred to in paragraph 134 of the NPPF.

These are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another; and
- To assist in safeguarding the countryside from encroachment.

8.6.2. Paragraph 2.18 attempts to provide a definition of the word "sprawl", as used in Green Belt purpose 1.

8.6.3. The review document has provided one definition of sprawl in isolation in order to suit its own purpose.

8.6.4. It is defined as being "Spread out over a large area in an untidy or irregular way".

8.6.5. Collins Dictionary provides this definition; "the spread of an urban area into what used to be countryside. Beyond the suburbs, many towns and cities have a green belt to stop urban sprawl".

8.6.6. Oxford Learners Dictionaries defines the word sprawl as "a large area covered with buildings that spreads from the city into the countryside in an ugly way".

8.6.6.1. This development would surely be in an ugly way given the amount of open space it would consume and the significant traffic junction that would be required to service a residential estate of this size directly from the main dual carriageway (A580).

8.6.7. It seems clear there is a lack of agreed upon description of what defines sprawl, but it seems there are a number of pointers or indicators that demonstrate sprawl occurring.

8.6.8. The definition in this regard should really be used in context, namely 'urban sprawl'.

8.6.9. This would be something like "the spreading of a city and its suburbs over more and more rural land".

8.6.10. That is exactly what this development would be; increasing the town away from its centre with residents isolated from the main amenities and public transport links.

8.6.11. I accept there is probably widespread disagreement about what constitutes sprawl and how to quantify it, but here is another description, it's associated with decentralization or the spread of population without a well-defined centre. As mentioned previously, this development would be exactly a spread of population further away from the centre.

8.6.12. Or how about this definition, "uncoordinated growth and the expansion of community without concern for its consequences, in short, incremental urban growth which is often regarded unsustainable".

8.6.13. Land for sprawl is often taken from fertile agricultural lands, which are often located immediately surrounding cities. The mere fact that GBP_098 is prime agricultural land being consumed for housing development meets that criteria perfectly and therefore answers the Green Belt point one in regards to this parcel actually contributing to sprawl.

8.6.14. Sprawl is also linked with low-density developments, which could be argued to be a subjective measure itself. Parcel GBP_098 appears to only yield around 50% net development which sounds fairly low-density to me, no matter how subjective/biased I might be on this subject.

8.6.15. Single use development is also associated with sprawl and given this land is only being viewed as residential, it also ticks that box too.

8.6.16. Consequently, large tracts of land that are devoted to a single use and are segregated from one another by open space, infrastructure, or other barriers (in this case, infrastructure).

8.6.17. As a result, the places where people live, work, use health/ medical facilities and shop are far from one another, usually to the extent that walking, public transport and cycling are impractical, so all these activities generally require a car.

8.6.18. Whilst this Local Plan trumpets it plans for the growth of the town, development on 8HS would satisfy all of the negative consequences of sprawl.

8.6.18.1. The impact to existing residents, the environment, (air/noise pollution and wildlife), increased traffic fatalities, congestion and jams, loss of agricultural capacity and increased car dependency due to its isolation from bus and train routes.

8.6.18.2. There is the chance this will have many health impacts, air pollution being the obvious one, but also an increased risk of obesity.

8.6.18.3. People will rely on their vehicles more often, even for short trips, instead of walking or cycling. This lower level of activity increases the risk of obesity, which can lead to other health problems such as heart disease, high-blood pressure and diabetes – further stretching already inadequate health resources in the area.

8.6.19. Once started, where would this sprawl end?

8.6.19.1. The next pieces of rural land adjacent to 8HS would surely be next, thus not only sprawling away from St Helens, but then starting to border on neighbouring districts; in this case Knowsley, Kirkby and Prescot.

8.6.19.2. It is clear that development on this piece of land would also tick the box of the third Green Belt purpose. It seems obvious that not only does this development encroach into the countryside, it opens the door to future developments and therefore would not safeguard the countryside for future generations.

8.7. **Point 7**

8.7.1. Paragraph-4.5 justifies the carrying forward of parcel GBP_033 and GBP_036 despite their 'high' score at Stage 1B, and Paragraph-4.6 justifies GBP_039 being carried forward, despite its 'high+' status.

8.7.2. It seems completely wrong that one of the factors for ignoring these high scores at Stage 1B was the fact that there is strong evidence of developer interest.

8.7.3. I'm quite sure there is strong developer interest in any parcel of Green Belt land that is readily available for development.

8.7.4. It demonstrates again the Council have devised a scoring mechanism to be followed and then subjectively choose when to apply the process.

8.7.5. If they ignore the 'rules' in this instance, how many other times have they chosen to side-step the process in the thousands of pages in the LPSD?

2

9. Appendix – C – Green Belt Review (Stage 1B)

9.1. Reviewing the Council scoring for GBP_098, they have allocated the following scores for the 3 Green Belt purposes:

- 9.1.1. Reason 1 = Low
- 9.1.2. Reason 2 = Low
- 9.1.3. Reason 3 = Low

9.2. Comparing that to other similar parcels we start to see some anomalies in the subjective scoring technique they have adopted.

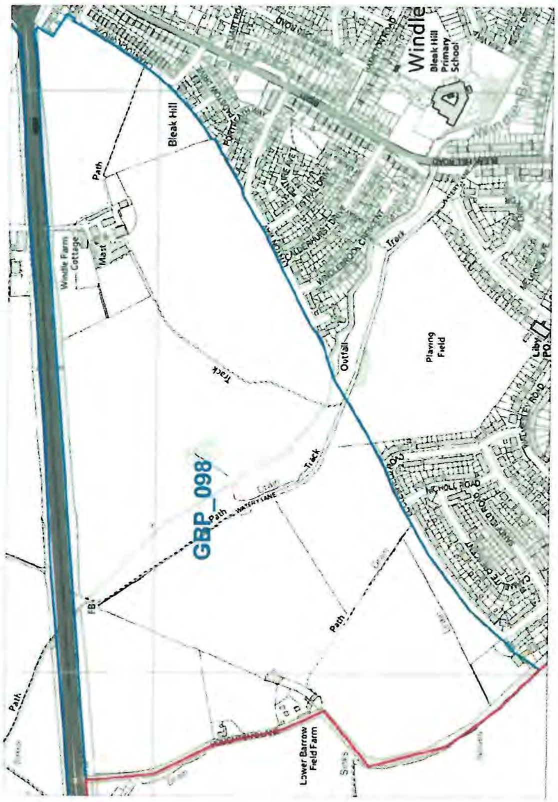
9.3. Whilst I accept that Paragraph-2.15 state that each parcel has been assessed individually, it simply has to follow that a consistent approach is applied across each parcel.

9.4. You cannot logically reason for one parcel and assign one score and then have those same logical findings for another parcel and assign a different result.

9.5. GBP_010 consists of parcel which are not too dissimilar to GBP_098

9.6. Parcels "a", "c" and "d" are also bounded significantly along one edge by residential development and by the A570 along another.

9.7. GBP_098 is bounded by the A580 and a residential development along another.



9.8. GBP_010 however was scored as follows:

9.8.1. GBP_010a: Low, Low, Low

9.8.2. GBP_010b: Low, Low, Medium

9.8.3. GBP_010c: Low, Low, Medium

9.8.4. GBP_010d: Low, Low, Medium

9.9. So how is it for Green Belt reason 3, sub-parcels b, c and d have scored 'medium' on parcel GBP_010 and yet GBP_098 is scored low?

9.10. GBP_010b - The sub-parcel contains little inappropriate development within it. It is enclosed to extent along the eastern boundary although retains a sense of openness to the west.

9.11. GBP_010c - The sub-parcel contains little inappropriate development and retains a sense of openness to the south and west.

9.12. GBP_010d - The sub-parcel contains little inappropriate development and retains a sense of openness to the south and west.

9.13. GBP_098 - The parcel has very little inappropriate development and retains some open views to the west.

9.14. Very similar findings so far and in fact "c" and "d" retain openness to both south and west, when GBP_098 only retains it to the west. In other words, if GBP_010 can be scored

medium by retaining a sense of openness to the south and west, how can it be that GBP_098 is scored low with only openness to the west?

9.15. GBP_010b - It lies on the edge of the settlement in between residential development to the east and the By-Pass to the west affecting the countryside character to a moderate extent. The By-Pass would also form a hard barrier containing any level of countryside encroachment.

9.16. GBP_010c - The degree of enclosure varies and is greater where the sub-parcel adjoins existing residential development to the north-east. The level of any countryside encroachment would therefore depend on the extent to which the sub-parcel is developed; although the By-Pass would serve as a hard barrier to contain this to the west.

9.17. GBP_010d - It is relatively well enclosed by adjacent existing development of a more urban nature to the north, east and south affecting the level of countryside character.

9.18. GBP_098 - The A580 to the north and the residential development to the south and east impact on countryside character.

9.19. On GBP_010, the By-Pass (A570) affects countryside character but would also form a hard barrier. By definition then, the A580 must also affect countryside character and equally form a hard barrier.

9.20. It should therefore follow that if GBP_010b/c/d have been scored medium, then GBP_098 should be scored in the same manner.

9.21. Overall significance:

9.21.1. GBP_010b/c/d - The sub-parcel does not perform a significant role in preventing sprawl and in maintaining a gap between identified settlements; although it maintains a moderate level of countryside characteristics and openness.

9.21.2. GBP_098 - The parcel is well contained. The A580 to the north and the residential development to the south and east impact on countryside character.

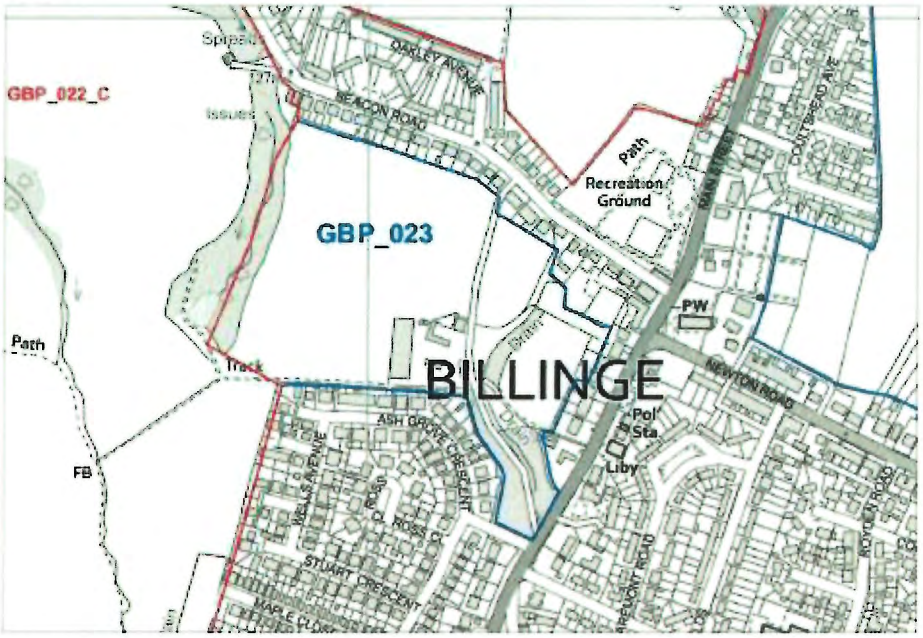
9.21.3. So, GBP_098 parcel is well contained and as such does not perform a significant role in preventing sprawl; same as GBP_010 then. GBP_010 maintains only a moderate level of openness and countryside characteristics; same then as GBP_098 with the south and east impacting on countryside character.

9.21.4. If it is therefore true that if you state that "Sub-parcels GBP_010_B, GBP_010_C and GBP_010_D make a moderate contribution to the purposes of Green Belt land and therefore should be carried forward to the Stage 2 Assessment", the same has to be said of GBP_098.

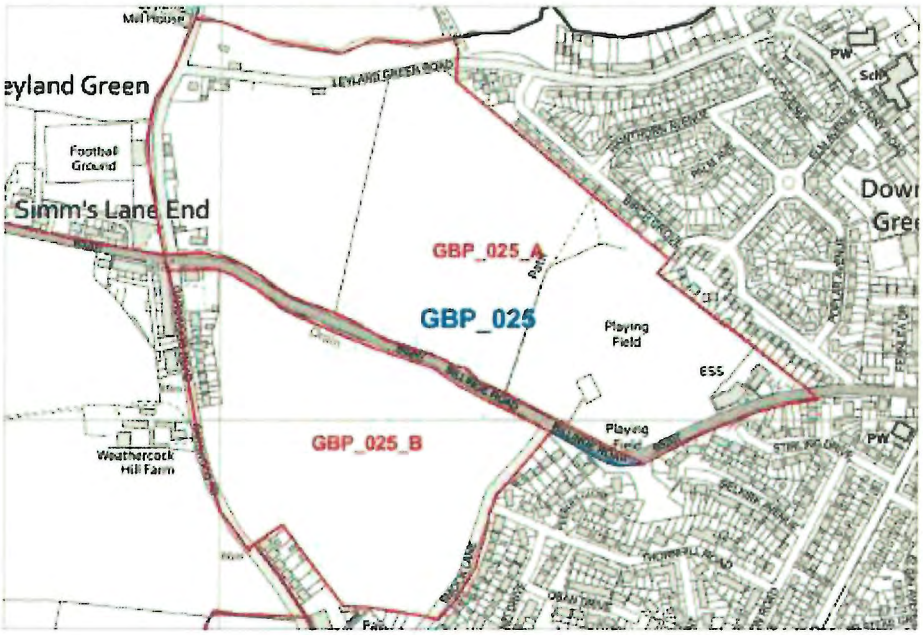
9.21.5. It cannot follow that "Parcel GBP_098 makes only a limited contribution to the purposes of Green Belt land".

9.21.6. GBP_098 should have a Stage 1B score therefore of medium.

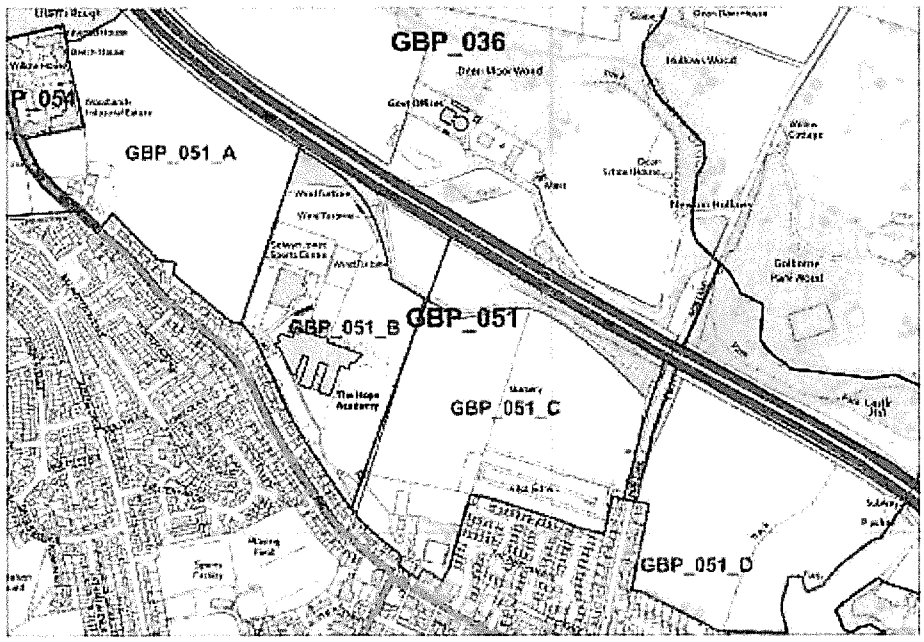
9.21.7. The same analogy can be performed with GBP_023 which also scored medium and had findings of "The perception of open countryside is only obtained when looking westward", which is the same as GBP_098 only retaining "some open views to the west".



9.21.8. Equally for GBP_025a which has strong boundaries to the east, south and west and in-part to the north and is therefore partially well contained which scores a medium on Green belt purpose 3; GBP_098 should be scored the same.



9.21.9. GBP_051 does not look too dissimilar to GBP_098 but yet is scored as medium. The perception of open countryside is only achieved on one side, to the north.



9.21.10. Prior to reviewing the Stage 2B score (currently medium also), this would yield a medium-medium score for GBP_098, producing an overall score of 4.

9.22. In line with all other parcels of land that produced an overall score of 4, GBP_098 should have been ***discounted*** instead of safeguarded.

10. Appendix – D – Green Belt Review (Stage 2B)

10.1. Unlike Stage 1B the LPSD provides no logical reasoning for its findings to score parcels as 'good', 'medium' or 'limited' in terms of development potential.

10.2. The Stage 2B Pro-Forma templates are not part of the Green Belt review document.

10.3. It is therefore not possible to critique the results of this process.

10.4. STHC have given a score of 'medium' to GBP_098 to assess its developability.

10.5. I disagree and say it is 'limited'

10.6. Given that the Stage 2B pro-forma documents are missing it is impossible to perform a comparative analysis between parcels in order to demonstrate consistency or not as the case may be.

10.7. In the absence of those documents, I have followed the template myself in order to assemble the findings and assess suitability in my view.

10.8. Appendix F: Page-429 - STAGE 2b DEVELOPABILITY ASSESSMENT

10.9. <u>SUITABILITY</u>

10.9.1. ***Landscape and visual character (Landscape Character Assessment Final Report January 2006)***

Visual Sensitivity	**Medium**
General Visibility	Medium – subtle change in elevation visually links area to adjacent landscapes.
Population	Medium – limited population within character area, but views from access roads and adjacent urban edge.
Mitigation Potential	Low – difficult to mitigate changes to landform and repetition of elements.

Landscape Strategy

From the combined assessment of strength of character and landscape condition the landscape strategy is defined as ***Conserve & Restore.***

Condition			
Good	Strengthen	Conserve & Strengthen	Conserve
Moderate	Strengthen & Enhance	Conserve & Enhance	Conserve & Restore
Poor	Creation	Restore & Enhance	Restore
	Weak	Moderate	Strong

Strength of Character

Landscape Management Issues & Opportunities
Strategy recognises importance of conserving unique small scale of rural landscape character and the restoration of elements which contribute to that character.

Woodland Recommendations
The existing pattern of hedgerows within the landscape should be conserved and enhanced with a mixed broadleaf species including hawthorn, appropriate to the area. There are limited opportunities to develop woodland within this area as this would interrupt the existing repetition of landscape elements. Although some opportunity exists for the small scale development and reinforcement of existing tree belts and copses associated with farm steadings.

Judgement about potential to accommodate Development
Due to the small size of the area and unique landscape character further development should be avoided within this character area.

10.9.2. ***Would any development lead to enhancement of a derelict or previously developed site?***

10.9.3. No, this site does not promote any regeneration of derelict land or any enhancement whatsoever.

10.9.4. It would in fact have a negative impact to the landscape rather than achieving any enhancement at all.

10.9.5. ***The Councils own reference document on this subject has concluded the following:-***

10.9.6. The landscape assessment concluded that further development should be avoided in this area.

10.9.7. The strategy should be one of Conserve and Restore

10.9.8. ***Additionally:-***

10.9.9. The site does not promote the regeneration of any derelict land which might offset or override the landscape character assessment findings

10.9.10. ***Ecology***

10.9.11. The Habitats Regulation Assessment has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area.

10.9.12. Other parcels of land have equally been identified as such and been discounted.

10.9.13. ***Agricultural Land and Quality***

10.9.14. Predominantly Grade 1 (98%) agricultural land – the best and most versatile land.

10.9.15. The "appendix-5-sa-scoping-report.pdf" document prepared by LUC states in Para-4.28 that the Local Plan should avoid development on the best and most versatile agricultural land

10.9.16. Where its use is permitted, it should be temporary and reversible

10.9.17. What is the use in paying for these expert consultancy reports if they are then ignored?

10.9.18. National Planning Policy Framework (NPPF):

10.9.18.1. LPAs should make decisions that contribute to and enhance the natural and local environment by:

10.9.18.2. protecting landscapes, geology, and soils considering the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land preventing soil, air, water, or noise pollution, or land instability from new and existing development

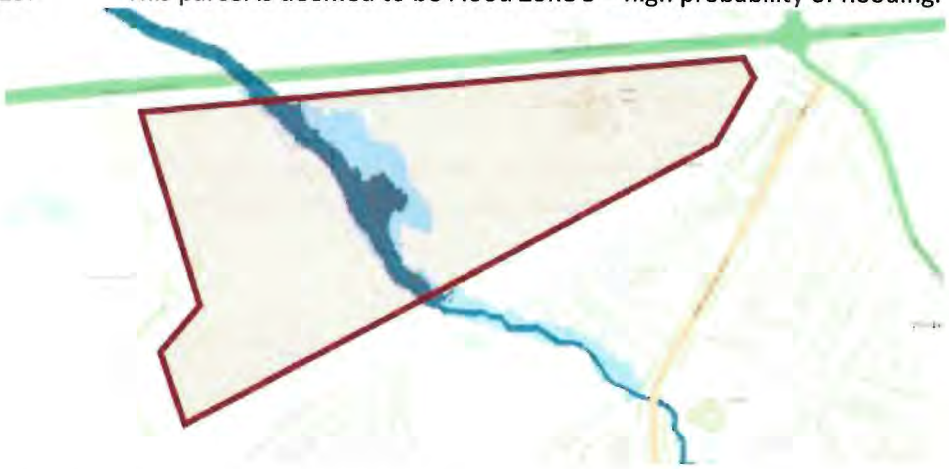
10.9.19. ***Heritage***

10.9.20. No comment

10.9.21. ***Flooding***

10.9.22. Reference "flood-map-planning-2019-01-28T19_11_52.008Z"

10.9.23. This parcel is deemed to be Flood Zone 3 – high probability of flooding.



10.9.24. Refer to Appendix F - Sustainability Appraisal for more detailed comments on flooding.

10.9.25. ***Trees and Woodland***

10.9.26. No comment

10.9.27. ***Open Space and Recreation***

10.9.28. There are 4 Public footpaths/ rights of way through the site

10.9.29. ***Minerals***

10.9.30. No comment

10.9.31. ***Infrastructure***

10.9.32. United utilities pipes

10.9.33. Would be affected by transport requirements – essentially everything would need to be via East Lancs/ Houghtons Lane.

10.9.34. Significant new junction required, typically something like the Haresfinch junction, so close to the existing Windle Island which is already a very dangerous junction, undergoing significant investment to make it safer.

10.9.35. ***Ground Conditions***

10.9.36. No comment

10.9.37. ***Air, Water and Noise pollution***

10.9.38. Significant Air and Noise pollution from the East Lancs. Developing here has already identified that it would need to be set-back 40m from the A580, thus reducing the net area available.

10.9.39. Given a new junction likely to be required at Houghtons Lane, there will be an increase in stationary traffic sat idling at a signalled junction, both east and westbound.

10.9.40. Hazardous Installations

10.9.41. No comment

10.9.42. Neighbouring Issues

10.9.43. Development would undoubtedly lead to amenity issues.

10.9.44. Services are already stretched in the area with council currently looking to expand Bleak Hill for the current needs of the area, something that will already significantly impact the residents living in the immediate proximity to that school.

10.9.45. All supermarkets are across the other side of town, leading to increased traffic congestion.

10.9.46. It is already the case that you need to know you will be sick 3 weeks in advance of it happening so that you can get an appointment with your GP.

10.10.TRANSPORT ACCESSIBILITY

10.10.1. Walking

10.10.2. Is the parcel/sub-parcel within 800 metres safe and convenient walking distance of a district or local centre?

10.10.2.1. NO

10.10.3. If not what is the walking distance to such facilities?

10.10.3.1. 1200 metres+

10.10.4. Is the parcel within 400 metres, 400-1200 metres or 1200 metres+ safe and convenient walking distance of a primary school? (1200m+ should be flagged up as an issue that needs considering further in the overall Developability section)

10.10.4.1. 1200 metres+ to a primary school but given there is no capacity at those schools within that distance, the actual distance is significantly more. Building another primary school in the Eccleston/ Windle area would just magnify the existing traffic/ parking/ congestion issues significantly.

10.10.5. Cycling

10.10.6. Is the parcel/sub-parcel within 1 mile safe and convenient cycling distance of a district or local centre?

10.10.6.1. NO

10.10.7. If not what is the cycling distance to such facilities?

10.10.7.1. 1200 metres+

10.10.8. Public Transport

10.10.9. Is the parcel/sub-parcel within 400 metres safe and convenient walking distance of a bus stop with a reasonable range of services to different destinations?

10.10.9.1. NO

10.10.10. Is it within 800 metres safe and convenient walking distance of a train station?

10.10.10.1. NO

10.10.11. Is the parcel/ sub-parcel within a 40 minute journey by public transport to a secondary school?

10.10.11.1. Yes, but those secondary schools within that 40 minute journey time have no capacity

10.10.12. Vehicular Traffic

10.10.13. Can safe and convenient access be provided for all vehicles that are likely to use the parcel/sub-parcel to and from (a) the public highway and (b) the strategic road network?

10.10.13.1. Access can only be from A580 or Houghtons Lane, a point already recognised within the plan. Access from the A580 would mean the creation of a significant new junction, within close proximity to the already dangerous and congestion Windle Island junction (currently undergoing a significant makeover due to the issues there, none of which anybody truly knows will fix the issues). At the very least, access from the A580 would have to be a signal controlled junction, again, very close to the Windle Island traffic controls, which wold not seem to fit in with creating flow traffic. It would lead to a significant increase in idling vehicles, close to the residential development, thus increasing the air and noise pollution exponentially.

10.10.13.2. Houghtons Lane is a small country lane, (a farm access road type). This cannot be considered as a viable access route to serve over 1000 new homes. Delivery trucks, new bus routes and refuse collection also has to be considered. This would mean investment in converting this road to something more suitable for that volume of traffic access. This can only really be done from the A580 end of the road, as the other end cannot be expanded due to be constrained by existing residential properties.

10.10.13.3. This would mean the primary access point to this development would have to come via the A580, meaning the majority of additional traffic would have to approach via Rainford Bypass, A580, Rainford Road, Bleak Hill Road; all of which already suffer with congestion and directing another 2000+ vehicles through this area is not in line with safe and convenient vehicular access.

10.11. ACHIEVABILITY

10.11.1. Viability Considerations

10.11.2. What viability zone (as identified in the EVA) does the parcel/sub-parcel fall within?

10.11.2.1. No comment

10.11.3. Would any development be likely to be subject to abnormal costs?

10.11.3.1. YES

10.11.3.2. Road network infrastructure to provide safe and convenient access.

10.11.3.3. New/ expanded primary school

10.11.3.4. New/ expanded secondary school

10.11.4. Gross Developable Area

10.11.4.1. 59.79Ha (based on Stage 1B sheet contained in GBR2018)

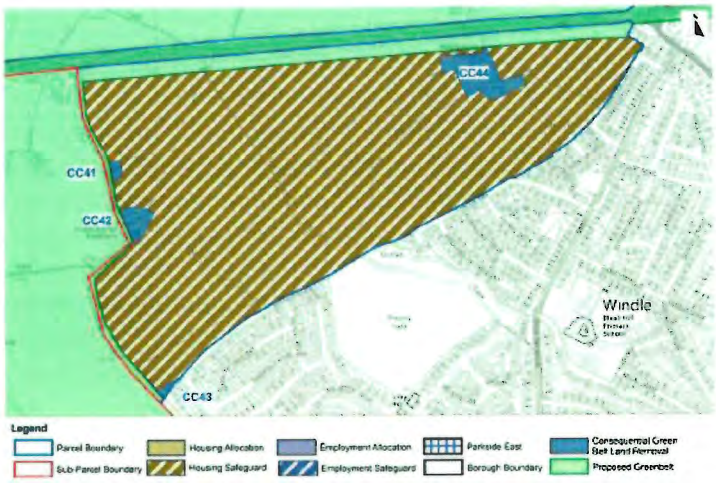
10.11.4.2. @30 dph = 1794 Houses

10.11.5. Net Developable Area

10.11.5.1. 956 (based on summary sheet contained in GBR2018)

10.11.5.2. 956 / 1794 = 53%

2

Sub-parcel	GBP_098	LPPO Ref:	HA16	Ward	Eccleston and Windle
Location	Land south of A580 between Houghtons Lane and Crantock Grove, Windle				
Plan					

Summary						
Stage 1b (Purposes of Green Belt)	Stage 2b (Developability Assessment)	Agricultural Land Classification	Overall Scores	Preferred Use	Residential Density (dph)	Net Developable Capacity (NDC)
Low	Medium	Mixed with Grade 1	5	Housing	30	956

10.12. CONCLUSIONS ON DEVELOPABILITY

10.12.1. Summary of Developability Assessment

10.12.2. Negative impact to landscape
10.12.3. Strategy advised to be one of conserve and restore
10.12.4. Loss of high quality farmland
10.12.5. Site fall within Flood Zone 3
10.12.6. No safe vehicular access – significant infrastructure work required
10.12.7. Two main water pipelines running directly through the site
10.12.8. Air quality and noise implication due to proximity to A580
10.12.9. Edge of town development leading to increased vehicle dependence
10.12.10. Isolated from main public transport hub
10.12.11. Isolated from local amenities
10.12.12. No capacity at local primary schools
10.12.13. Net development capacity only just above 50% - significantly below 75% target for a parcel of this size

10.12.14. Preferred use

10.12.15. HOUSING

10.12.16. Notional development capacity

10.12.17. 53%

10.12.18. Developability Score

10.12.19. LIMITED

10.13. In line with all other parcels of land that produced an overall score of Limited, GBP_098 should have been ***discounted*** instead of safeguarded.

11. Appendix – E – Green Belt Review (Stage 3)

11.1. Ignoring the fact I believe GBP_098 to be scored incorrectly at Stages 1B and 2B, when comparing with other parcels that had matching scoring through Stages 1B and 2B, (i.e. Low-Medium), produces a list of 6 other parcels (so 7 in total including GBP_098), one of which was discounted; GBP_001b.

11.2. Referencing the tables in the document, it seems clear that Low-Medium should score a 5, as 6 of the 7 parcels did.

11.3. It doesn't seem to make any sense why GBP_001b was given an overall score of 4 and just highlights that the measurement system used by the council in this review is not robust, repeatable or capable.

STAGE 3A - RANKING OF THE REMAINING PARCELS AND SUB-PARCELS

2.54 To rank the remaining parcels and sub-parcels, the Council firstly attributed a numerical score from their assessment at Stages 1B and 2B. For the Stage 1B findings the following points were attributed:

Overall significance of the parcel/sub-parcel to the 3 Green Belt purposes assessed in the Review	Score attributed
Low	3
Medium	2
High	1
High +	0

2.55 For the Stage 2B findings the following points were attributed:

Overall development potential of the parcel/sub-parcel	Score attributed
Good	3
Medium	2
Limited	1

11.4. If GBP_001b is truly a 4, for some other reason, there may be some indication in the ranking and refinement section of the document in Chapter 5. The residential section starts on Page-57 with Paragraph-5.8 and Table-5.3.

11.5. <u>GBP_001b – Discounted</u> *<u>(Overall Score=4 | True Score=5)</u>*

11.5.1. GBP_001b has significant constraints which impact its developability.

11.5.2. GBP_098 has a number of constraints which would have a significant impact on the NDA and the deliverability of development within it.

11.5.3. GBP_001b is classed as Grade 1 Agricultural Land and is also a considerable distance from the nearest local centre, key amenities (including nearest primary schools); 1.3m to Rainford Village. Its development would cause an extension of development into the countryside.

11.5.4. GBP_098 is mixed Agricultural Land but does contain a significant percentage of Grade 1 along with some Grade 2. In terms of what might be classed as a 'local centre', it is 1.1m to Dentons Green shops and facilities. The primary schools in this area are already at capacity but in any case would be the same distance away, as

per GBP_001b. Likewise, development here would be an extension of development into the country side.

11.5.5. GBP_001b has Bawdy Brook (a LWS) running along the boundary, requiring a considerable buffer for any development.

11.5.6. GBP_098 would be required to protect Windle Brook (also a designated LWS), thus needing a 20m buffer.

11.5.7. GBP_001b is believed to provide functionally linked habitat connected to European sites in the wider area.

11.5.8. GBP_098 was also identified in the Habitats Regulation Assessment that it too is likely to provide functionally linked habitat for bird species, connected with the European protected sites in the wider area.

11.5.9. GBP_001b is identified as needing to address the lack of footpath on the highway.

11.5.10. GBP_098 identifies that significant improvements would be required to highways infrastructure. Vehicular access is likely only possible from Houghtons Lane, a narrow country lane, requiring a substantial upgrade and the creation of a new junction with the A580.

11.6. In summary, both of these parcels have practically identical findings and yet one has been discounted and the other safeguarded, thus highlighting the inconsistency in the subjective scoring mechanism devised by the council; it is open to interpretation and manipulation. If there has been some manual adjustment to GBP_001b for any or all of the above finding, that adjustment should be equally applied to GBP_098.

11.7. If anything, GBP_098 should have been the discounted site given that the findings mention the available capacity at schools in the area, plus other social infrastructure (GBP_001b only mentions distance to schools and not capacity).

11.8. Additionally, GBP_098 has two United Utilities pipelines running right across the site, further impacting development.

11.9. Adding all of that to the fact that a further minimum buffer of 40m to the A580 would be required, it is hard to see how this site is considered suitable for removal from Green Belt and safeguarded for future development needs.

11.10. Not that I agree with GBP_044 or GBP_45a being safeguarded and I have not investigated those parcels to the depth I have GBP_098, but comparing the findings between the two shows the inconsistency again. GBP_044 is identified to be in a sustainable location, within walking distance of local conveniences and public transport facilities. GBP_45a can obtain suitable access of the A49, subject only to a speed limit zone being extended and not significant and substantial upgrades. If those two sites are truly what is deemed to be suitable for safeguarding, again, it is hard to see how GBP_098 can also be considered in the same category given it is not in a sustainable location, does not have local amenities or school places and requires substantial highway infrastructure works. It should be noted that those significant highway upgrades would be in an area around the A580 and Windle Island, something that is currently ongoing for existing issues and is causing significant traffic congestion problems, appearing daily on every local radio hourly traffic announcement.

11.11. If we compare with what GBP_098 should have been (i.e. Medium @ Stage 1B, therefore Medium-Medium), we have 3 comparisons, 2 of which were discounted and 1 safeguarded. These are GBP_005b, GBP_029b and GBP_025a respectively.

11.12. <u>GBP_005b – Discounted</u> *<u>(Overall Score=3 | True Score=4)</u>*

11.12.1. GBP_005b is land classed as Grade 1 agricultural land; same as GBP_098 contains.

11.12.2. GBP_005b is in close proximity to Rainford by-pass (A570) giving rise to potentially significant air quality and noise issues; same as GBP_098 in regard to the far busier A580.

11.12.3. GBP_005b would require a buffer strip amongst other suitable attenuation measures; same as GBP_098 would require on probably a greater scale.

11.12.4. GBP_005b lies partially (only partially) in the buffer zone (not the actual pipe, just the buffer zone) for an Oil Pipeline.

11.12.5. GBP_098 actually has two United Utilities pipelines, including a main combined sewer.

11.12.6. GBP_005b is clearly recognised as a parcel not suitable as a potential development site and therefore released from Green Belt due to the cumulative constraints associated with it.

11.12.7. GBP_098 has all of those same cumulative constraints and yet is somehow considered to be suitable for removal from Green Belt, albeit as safeguarded.

11.12.8. GBP_005b has had its score manually adjusted/ manipulated from a 4 to a 3 to ensure it looks a parcel to be discounted.

11.13. <u>GBP_025a – Safeguarded</u> *<u>(Overall Score=5 | True Score=4)</u>*

11.13.1. Not that I agree with GBP_025a being safeguarded and I have not investigated that parcel to the depth I have GBP_098, but comparing the findings between the two shows the inconsistency again.

11.13.2. GBP_025a is within walking distance of convenience stores and is readily accessible by bus and rail.

11.13.3. GBP_098 is not served by any public transport and significant improvements would be required.

11.13.4. GBP_025a includes agricultural land which is Grade 3 quality and therefore lower than in other parts of the borough.

11.13.5. GBP_098 is Grade 1 and 2 agricultural land.

11.13.6. GBP_025a can have safe vehicular access from 3 existing road (Leyland Green, Garswood and Billinge Roads).

11.13.7. GBP_098 would not have safe vehicular access without significant and substantial investment in the highways.

11.13.8. If GBP_025a is truly what is deemed to be suitable for safeguarding then, once again, it is difficult to comprehend how GBP_098 is categorised in that same bracket.

11.13.9. GBP_025a has had its score manually adjusted/ manipulated from a 4 to a 5 so that it could be classed as safeguarded. Its true score though is a 4 and with all those similar findings to GBP_098, it demonstrates further that GBP_098 should have been discounted rather than safeguarded.

2

11.14. <u>GBP_029b - Discounted</u>

11.14.1. GBP_029b suffers with not all being developable with the southern part housing a wildlife habitat which is expected to be retained, thus reducing the NDA.

11.14.2. GBP_098 has a number of constraints which impact its developability, far more than GBP_029b (a designated LWS driving a 20m buffer zone, 40m buffer to A580 for noise and air pollution, two UU pipelines).

11.14.3. GBP_029b has access via Camp Road but there are known capacity issues.

11.14.4. GBP_098 can only really be accessed via a small country lane and a significant new junction on the A580 would be required in order to provide safe access. A580 in that area already suffers capacity issues, with major surgery already being carried out at Windle Island to solve existing issues, never mind additional capacity from this development.

11.14.5. GBP_029b would require noise attenuation measures to be provided due to the proximity of the railway line.

11.14.6. GBP_098 would equally need suitable attenuation measures for noise and air pollution from the A580.

11.14.7. Once more, if GBP_029b is deemed a site to be discounted, then it is difficult to see how all of the same logical arguments are not equally applied to GBP_098 and as such, also discounted.

11.15. The points raised throughout this document clearly show inconsistencies with subjective scoring and findings.

11.16. It's is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

12.4. Summary

12.4.1. As with the Green Belt Review 2018 document, it appears this report also appears to skew the reality in order to present a parcel of land in a particular way.

12.4.2. You can't help but assume when that is done, the end result is in fact the starting point and all data and factors are "engineered" to suit.

12.4.3. That aside, the fact is 8HS has been recorded with more factors that are likely to promote negative effects and yet has still been safeguarded for development.

12.4.4. The reality of the situation though is that this parcel of land has more negative factors than have been recorded.

12.4.5. Misleading data has been used in order to lower the negativity of some of the objectives.

12.4.6. When the integrity of the data can be questioned like this and so easily be shown to be a distortion of the truth, how can we trust any other areas of the plan and determine it to be 'a sound Local Plan'?

PO3794

ELO117

Representations concerning the St Helens Borough Local Plan 2020-2035 SPIC 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)

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. However, the name didn't really matter – the main issue was that it continued to be the green belt area separating the two communities of Eccleston Park and Rainhill. 1

Before it became a golf course the land was used as grazing land for livestock and to grow crops. Even as a golf course it continues to provide an attractive feature to the area and helps to retain a semi-rural feel to Eccleston Park and the communities which are adjacent to it, down Portico Lane, off Delph Lane, Two Butt Lane and those in Rainhill. It also helps to retain character and identity for Rainhill and Eccleston Park, rather than the housing estates simply running into one another to create an anonymous urban sprawl. Losing this open space, whether in 15 or 50 years time, will affect the feel, character and attractiveness of the whole area, and impact the quality of life for all local residents. 1

It also identifies the purposes of including land within the Green Belt as being:

1. to check the unrestricted sprawl of large built-up areas;
As stated above, the land currently does fulfil this role 1

2. to prevent neighbouring towns merging into one another;

The land at EPGC does fulfil this requirement. The communities / settlements in Eccleston Park and Rainhill have a strong 'sense of place' and separate identities. 1

3. to assist in safeguarding the countryside from encroachment;

The land at EPGC does fulfil this requirement. Despite being a golf course the land is still 'countryside' and is home to a host of species of birds, mammals and flora. 1

4. to preserve the setting and special character of historic towns; and

The character of both Eccleston Park and Rainhill is significantly influenced by their bordering onto green belt land. Eccleston Park is currently bordered by the fields behind St Helens Road to the North, and EPGC to the south. Rainhill is similarly characterized by EPGC to the north, fields behind Mill Lane stretching to the M62 in the south, and farmland to the east. The status of EPGC as green belt should be preserved to help maintain this. 1

5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Overall, the function and role of the land meets all the criteria to justify its current status as green belt. 1

THE NEED FOR A GREEN BELT REVIEW IN ST.HELENS

1.11 The NPPF sets out a presumption in favour of sustainable development under which local planning authorities should *'...positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change...'* and *'provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas'.* The NPPF also confirms that *'...once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...'.* The Council considers, for reasons summarised

below, that such circumstances exist in St.Helens.

I strongly disagree that there are any 'exceptional circumstances' to justify altering the EPGC green belt boundary / status. The review is flawed in many ways and does not provide adequate evidence to support the change in status to 'safeguarded'.

2.20 Green Belt Purpose 2 is to *'prevent neighbouring towns from merging into one another'.* Although the NPPF refers specifically to 'towns' the Council has also, in considering Purpose 2, taken some smaller settlements (including Rainhill, Rainford, Billinge and Garswood) into account. This is because, whilst these settlements are not regarded as 'towns', they each form separate communities with their own identities, character and range of community facilities and are identified in the Local Plan as the Borough's Key Settlements. The Council, therefore, has assessed each parcel/sub-parcel according to the contribution that it makes in preventing the following settlements from merging with each other:

- St.Helens
- Haydock and Blackbrook
- Newton-le-Willows/Earlestown
- Prescot/Whiston/Rainhill
- Rainford
- Billinge
- Garswood
- Warrington
- Ashton-in-Makerfield
- Golborne

I note that the list provided does not include Eccleston Park (or Eccleston). Eccleston Park has very much its own identify and character, to the extent of having two landmark public houses, its own railway station, and several roads (Central Avenue, Elm Grove, Albany Avenue) being considered by St Helens Council as 'Residential Character Area' locations (ref: 'https://www.sthelens.gov.uk/media/3189/residential-character-areas.pdf). I consider this a major omission and flaw in the review, given that the Eccleston Park Golf Club land currently stops the

distinct settlements / communities in Rainhill and Eccleston Park from merging into one another and creating a single community, and helps to avoid 'urban sprawl'. ①

At LPPO stage, Sport England objected to the allocation of the site for housing (proposed at that stage) on the basis that insufficient evidence concerning sporting needs had been provided. Whilst the golf course closed in summer 2018, there are a number of other golf courses in St.Helens and the Council did publish some evidence relating to this matter at LPPO stage, these points do not preclude the need for further evidence to be brought forward to meet the requirements of Sport England. This further evidence has not been obtained, meaning that the allocation of the site at present would conflict with national policy protecting sporting facilities from loss through new development. ① & ②

I would contest that any consideration to changing the status from green belt to 'safeguarded' is premature, given the statement above concerning the need for further evidence.

A further constraint relates to the highway network in the surrounding area (both within St.Helens and in the neighbouring Knowsley Borough). A number of junctions in the area already experience

capacity issues that are likely to be difficult to improve practicably or economically. In response to consultation at the LPPO stage, Knowsley Council (the relevant highway authority for some of the

affected highways) raised objections to the allocation of the site. These constraints are considered likely, in the absence of evidence to the contrary, to at least substantially limit the residential

capacity of this large parcel. In addition a number of physical constraints exist within the parcel itself.

Most households today have at least one car and many, two or three. Any development on EPGC land will certainly have a very bad effect on travelling in and around Eccleston Park, Rainhill and Prescot; we simply don't have the infrastructure to cope with any more traffic.

Previous developments around Rainhill and Prescot have had a massive impact on the volume of traffic generally in the Rainhill, Whiston and Prescot areas – but in particular on the whole of Warrington Road from Prescot, all the way through to the M62 junction at Rainhill Stoops. At many times of the day there are traffic queues, but during both morning and evening rush hours, Rainhill village is virtually gridlocked by traffic to/from the M62 and parents doing the school-run. The knock-on is to most roads joining Warrington Road; Delph Lane leading onto Warrington Road by the Hospital is particularly badly affected with queues sometimes stretching all the way back to the small roundabout at the convenience store on Portico Lane. Rainhill is already crying out for a some form of bypass, since the level of traffic on Warrington Road is continually growing at an unsustainable rate. ① & ②

Similarly, particularly during the morning rush hour, traffic heading from St Helens to Prescot along St Helens Road (the A58) on the stretch between the Portico Lane and Burrows Lane junctions regularly backs-up from the traffic lights at the Burrows Lane junction to as far back as Central Avenue and beyond. This is several hundred yards. In the evening rush hour, the traffic returning ① & ②

from the direction of Prescot and the M57 regularly backs-up all the way from the St Helens Road/Burrows Lane lights all the way onto the Prescot bypass. Any additional traffic generated by a development on EPGC would have serious implications to the already congested roads around Eccleston Park.

In another potential future scenario, should an access road be created from a housing development on EPGC onto Portico Lane, this would have serious impact on all roads in the vicinity. For example:

- *Delph Lane would see further traffic increases – and at rush hours it would be unable to cope*
- *The junction of Portico Lane and St Helens Road (at the Grapes pub) would become a significant bottleneck*
- *Central Avenue would become a cut-through for traffic heading onto St Helens Road and beyond*
- *The crossroads at St Helens Road and Burrows Lane (by the Wellington pub), which are themselves already horrendous at rush hour, would also be badly affected*

① + ②

These include a number of large electricity pylons that run through the parcel, alongside which a buffer would need to be provided to ensure satisfactory levels of amenity for occupiers of any new housing. An appropriate buffer zone would also need to be provided alongside the adjacent railway line to reduce the potential noise impact on occupiers of future dwellings within the parcel. A further buffer would be needed to protect the woodland to the north of the parcel. UU has also advised that a number of other major infrastructure assets run through the parcel including: various sewers; a trunk water main; the North Prescot Aqueduct; and Vyrnwy Aqueduct/pumping station. These physical constraints serve (particularly when viewed in combination) to fragment the developable areas within the parcel, thereby substantially limiting its NDA. ✓

I would suggest that all these issues, when viewed in combination, further support the retention of the current green belt status of the EPGC land. ①

Extracted from: 'The Green Belt Review 2018 Appendices: Appendix C, Part 6'

STAGE 1B ASSESSMENT AGAINST GREEN BELT PURPOSES

Findings: GBP_087 The parcel bounders the Liverpool to Manchester Northern Railway line to the north, a substantial protected woodland belt and residential dwellings to the north-east. Rainhill Road runs the length of the eastern boundary, with Two Butt Lane and the urban fringe of Rainhill on the southern boundary and the built-up area of Eccleston Park on the western boundary.

Please note that the railway to the north is the Liverpool to Wigan line, and not Manchester. ✓ NOTED

The parcel has strong boundaries and as such is considered to be well contained, and therefore would not lead to unrestricted sprawl.

I totally disagree that the development of the land would not lead to unrestricted sprawl. As I have explained above, the land currently provides a clear gap between the Rainhill and Eccleston Park ①

settlements. If this gap becomes filled with houses, the identities of these settlements will be lost by merging them into one. ①

The parcel currently lies in a Green Belt 'gap' between Eccleston Park, West Park, *West Park does not border EPGC* Rainhill and Whiston *EPGC borders Whiston for a few yards only.* However, this gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it is considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location. ✓ NOTED

The portion of EPGC land which boarders Portico Lane provides a clear, well defined and important border between Eccleston Park and Rainhill. I would contest that it's role is not 'moderate to weak' given that it runs along a significant portion of Portico Lane and provides a wide gap between the two communities. ①

Although the parcel has an open aspect, it has strong permanent boundaries and is surrounded by residential development on three sides, so therefore lacks a sense of openness. The parcel is quite clearly a golf course and as such has a more recreational appearance than countryside character.

I would estimate that about a third of the perimeter of the EPGC land borders residential developments and it does not lack a sense of openness at all. I would also contest whether the function or use of the land (i.e. whether a golf course or simply 'countryside') is relevant to this review, particularly when the definition and function of 'green belt' land, as summarized above, is taken into account. ①

The parcel benefits from strong boundaries, and is encroached on almost all sides (*I would suggest about 60% of its perimeter is encroached on)* by urban development. The parcel plays a limited role in the prevention of merging any two settlements or built up areas.

As discussed above, I totally disagree with this statement. I also believe that the 'encroachment by urban development' has been exaggerated in order to support the Council's wish to remove EPGC's green belt status. ①

Extracted from: 'St Helens Borough Local Plan 2020 – 2035'

4.6.9 The Council will also give continued priority to the development of suitable and available sites within urban areas. However, due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2035. Some other sites have been removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2035. This will ensure that the changes to the Green Belt endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, and giving a clear

PO3795

ELD169

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation
Peter Black
to:
planningpolicy
13/03/2019 11:46

[redacted]

1 - LPA04
2 - LPA04.1
3 - GBR
4 - LPA06
5 - LPA10

1 Attachment

St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black
Blackfryers Planning and Environmental Consultants
9 Ecclesbridge Road
MARPLE SK6 7PF
[redacted]

Final

St Helens Local Plan – submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council	Croft Parish Council
Clerk to the Council Mr. M. Durrington	Clerk to the Council Mr. M. Pope
9, Wigshaw Lane,	Unit K1, Taylor Business Park
Culcheth WA3 4LX	Warrington Road, Risley WA3 6BH

[redacted]

1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the Submission Draft for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- Employment Land Needs Assessment – Addendum Report January 2019; and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision *'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. A range of high-quality new employment development will have taken place…'.*

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide *'balanced regeneration'* or *'sustainable growth'* or provide *'high quality new employment'*. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a world leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests '*Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...*'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met. 1

4 Green Belt

4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that '*The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment.*' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'. 3

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen 'large previously undeveloped sites in *close proximity to the M6 and M62 in order to meet modern requirements and market demand*'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside. 3

4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration. 4

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

PO3796

ELD169

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation
Peter Black
to:
planningpolicy
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PO3797

EL0206

HS20

① - LPA05

② - GBR

③ - TABLE 4.7

St Helens Borough Local Plan 2020 - 2035 Submission Draft Representations
Daniel Strode
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:26

[redacted]

1 Attachment

PWA Representations to Submission Draft Local Plan_Rainford.pdf

Dear Sir/Madam

Please consider the attached document as a formal submission to the St Helens Local Plan Submission Draft representations. The online representations form has been completed and submitted to accompany the attached document.

I would be grateful if you could confirm safe receipt of the attached and we are kept updated of future stages of the Local Plan.

Kind regards,

Daniel Strode | Graduate Planner
[redacted]
2 Lockside Office Park, Lockside Road, Preston, PR2 2YS

www.pwaplanning.co.uk

Paul Walton Associates and PWA Planning are trading names of
Paul Walton Associates Limited, a company registered in England with number 8605706.

Representor Details

Web Reference Number	WF0055
Type of Submission	Web submission
Full Name	Mr & Mrs J & M Berry (landowners)
Organisation	and Seddon Homes (prospective developer)
Address	C/O agent C/O agent
Agent Details	Mr Paul Walton PWA Planning 2 Lockside Office Park Lockside Road Preston, PR2 2YS

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

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

Policy	Policy LPA05, Policy LPA05.1 & Policy LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
Please see supporting representations statement produced by PWA Planning which will be provided by email.

7. Please set out modification(s) you consider are necessary
Please see supporting representations statement produced by PWA Planning which will be provided by email.

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

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:
To explain in further detail the case put forwards within the supporting representations statement.

Response Date	3/13/2019 3:17:17 PM

pwa planning
GETTING DEVELOPMENT MOVING

ST. HELENS LOCAL PLAN 2020-2035: SUBMISSION DRAFT

LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD

Representations on Behalf of Mr & Mrs Berry (landowners) and Seddon Homes (prospective developer)

March 2019

RTPI
Chartered Town Planners

PWA Planning is a trading name of Paul Walton Associates Ltd. Registered in England and Wales no. 8605706. Registered Address: 316 Blackpool Road, Fulwood, Preston PR2 3AE

2 Lockside Office Park
Lockside Road
Preston
PR2 2YS

01772 369 669
info@pwaplanning.co.uk
www.pwaplanning.co.uk

3.4. Land adjacent to the site subject to this submission, known as HA15 (Land South of Higher Lane and East of Rookery Lane, Rainford) within the Preferred Options Plan has been retained as a Housing Allocation for the Submission Draft:

- 8HA - *Land South of Higher Lane and East of Rookery Lane, Rainford* – 11.49ha, 259 dwellings within the Plan period, 802 capacity.

3.5. Within the Preferred Options Plan there was a total of 24 sites allocated as 'Safeguarded Land' to meet the longer-term housing needs beyond the plan period. This included the site in question at Land South of Higher Lane and West of Mill Lane (ref. HS20). Of those 24 sites designated as Safeguarded Land, only 4 were carried forward as safeguarded land within the Submission Draft. HS20 was removed from the Submission Plan.

3.6. There are only 8 sites for Safeguarded Land within the St Helens Submission Draft and notable additions include large sites with a high dwelling capacity, which includes:

- 3HS – *Former Eccleston Park Golf Club, Rainhill Road, Eccleston* – 49ha, 956 dwellings capacity.

- 8HS – *Land South of A580 between Houghtons Lane and Crantock Grove, Windle* – 52.69ha, 1027 dwellings capacity.

Green Belt Review (December 2018)

3.7. As part of the preparation for the new Local Plan, St Helens Council identified that there was a shortfall of suitable land within its existing urban areas and in urban areas of near authorities to meet the Borough's housing needs. A Green Belt review was undertaken in 2018 which identified where development could be accommodated whilst causing least harm to the purposes of the Green Belt.

3.8. Within this Green Belt review, the site in question was considered for residential development (ref. GBP_019b Land south of Higher Lane, Rainford). The site was considered as part of a sub-parcel of a wider site, which included the land adjacent to the west (ref. GBP_019b). The site was reviewed with a potential capacity of 367 dwellings and was given an overall score of 3 (sites allocated were given a score of 6) and was therefore discounted.

3.9. The review indicates within the commentary on page 80 that although the site was proposed by the Council as a safeguarded site at LPPO stages, *"a number of constraints affect the sub-parcel that limit its suitability for new development"*. It is noted that there are more sustainable sites which would meet the future housing needs of the Borough.

3.10. The constraints of the site noted within the Green Belt Review are as follows:

- *The sub-parcel is bounded by highways to the north and east, Rainford Industrial Estate to the south, and a band of mature trees to the west. However, it is considered to have a lower degree of visual enclosure than the neighbouring sub-parcel GBP_019a. It is also further away from the village core of Rainford, and is a significant distance from the nearest primary school and convenience shop (approx. 1.45km). Due to its location, development of the sub-parcel would not represent a sustainable spatial approach to meeting housing needs.*

- *The sub-parcel has a Medium to High landscape and visual sensitivity, and is classed as mixed agricultural land including Grade 1.*

- *UU has advised that a main surface water sewer and a pressurised water main (and associated easements) exist to the north and south of the sub-parcel, which would need to be afforded due regard in any development proposal. A buffer would be required alongside the south-west boundary of the sub-parcel, due to air quality and noise pollution issues related to the adjacent Rainford Industrial Estate.*

- *The 2018 SA (Sustainability Assessment) concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of negative effects likely with regard to biodiversity, landscape sensitivity and access to education and health facilities.*

period as well as *"developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*. The NPPF supports the allocation of an appropriate mix of sites and highlights within Paragraph 68 that *"small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"*.

4.11. It is therefore considered that the Local Plan should include a greater mix (scale / location) of sites to meet the meet the Local Plan's housing requirement and the housing needs of the Local Authority and the communities they serve. As NPPF Paragraph 11 states, plans should *"seek opportunities to meet the development needs of the area and sufficiently flexible to adapt to rapid change"*. The reliance on a smaller number of larger Housing Allocations would not ensure that any future changes would be accounted for and would not see the Borough's housing needs met. 1

4.12. As there has also been a reduction in the amount of Safeguarded Land identified within the Submission Draft Local Plan for larger and a fewer number of sites, this may require further green belt reviews sooner than anticipated and this would also make the Local Plan unsound. 1

Suitability of the site

4.13. The Green Belt Review conducted of the site concluded that there are constraints to the delivery of homes on the site. As discussed in depth within the representations submitted in response to the Preferred Options (Appendix 2), there would be no technical constraints preventing the delivery of the site. Although mentioned within the Green Belt Review, it has been demonstrated that there would not be any negative effects on the biodiversity or landscape sensitivity of the site, and it lies within a sustainable location for development with schools and heath care facilities within walking distance of the site. 2

4.14. When testing the site against the purposes of including the site within the Green Belt, as stated within Paragraph 134 of the NPPF, the benefits of removing the site from the Green Belt would outweigh its continued inclusion as Green Belt land. The site would 2

lie adjacent to the Housing Allocation 8HA on the eastern edge of Rainford with the Rainford Industrial estate directly to the south of the site. Therefore, it would not result in unrestricted sprawl of large built up towns nor towns merging into one another. In terms of the visual enclosure of the site, the site is considered to be well contained in landscape and visual terms, with the site bound by the industrial estate to the south which extends along Mill Lane. (2)

4.15. Seddon Homes are working with the landowners to support the removal of the site from the Green Belt and the delivery of a residential-led scheme which can begin to deliver homes to meet the needs of all sections of the community within the early years of the plan period. The allocation of land at the site in question offers a very sensible means of achieving a better balance and increasing supply in the short and medium term and would help to address the unsoundness evident in the current plan. (1)

/5 CONCLUSIONS

5.1. PWA Planning is retained by Mr & Mrs Berry (landowners) and Seddon Homes (prospective developers) to make representations on the St. Helens Local Plan 2020 – 2035 Submission Draft.

5.2. PWA Planning are of the opinion that the allocation of the site at land located to the south of Higher Lane and to the west of Mill Lane, Rainford should be allocated for housing within the emerging Local Plan and is consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.

5.3. In summary, in response to the St Helens Local Plan Submission Draft, it is considered the following:

- The significant reduction in housing requirement figure conflicts with the Council's earlier economic growth agenda;
- The significant reduction in the range and geographical spread of housing sites in favour of a small number of much larger green belt releases is not good practice;
- The reduced amounts of safeguarded land may require further green belt reviews sooner than anticipated;
- The allocation of the site offers a sensible means of achieving a better balance and increasing supply in the short and medium term;
- Seddon Homes are working with the landowners to see the land released from the Green Belt and the delivery of homes to meet all needs of the community within the early years of the plan period;
- Technical and environmental reports have shown that there are no insurmountable barriers to the delivery of the site for housing and there are no

constraints preventing the development of this site in conjunction with the Housing Allocation 8HA. (2)

5.4. Given the importance of ensuring that the St Helens Local Plan 2020 - 2035 is able to identify an adequate supply of housing for the plan period, PWA Planning support the removal of this site from the Green Belt and its allocation for housing development. (1)

PO3798

EL0207

St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of Bellway Homes Ltd
Claire Pegg/GBR
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:33

(1) - LPA 05
(2) - LPA05 Table 4.6
(3) - LPA02
(4) - GBR

[redacted]

3 Attachments

lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf Appendix 1 - Previous Representations.pdf

Bellway - Rainhill Hall Farn - St Helens Submission Draft - March 2019.pdf

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of Bellway Homes Limited with regards to Land at Rainhill Hall Farm.

I will send Appendices 2 and 3 under separate cover due to their large file size.

I would be grateful if you could confirm receipt of this email and the attachments, and keep us updated on the progress of the Local Plan.

Please don't hesitate to let me know should you have any queries.

Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting

[redacted]

No 1 Marsden Street I Manchester I M2 1HW

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St. Helens Borough Local Plan 2020-2035 Submission Draft
Claire Pegg/GBR
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:31

[redacted]

2 Attachments

lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf

Bellway - Rainhill Hall Farn - St Helens Submission Draft - March 2019_merge.pdf

Hello,

Please find attached representations made to the St. Helens Borough Local Plan 2020-2035 Submission Draft on behalf of Bellway Homes Limited with regards to Land at Rainhill Hall Farm.

I would be grateful if you could confirm receipt of this email, and keep us updated on the progress of the Local Plan.

Please don't hesitate to contact me should you have any queries.

Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting

[redacted]

No 1 Marsden Street I Manchester I M2 1HW

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St.Helens Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	**2. Your Agent's Details (if applicable)** (we will correspond via your agent)
Title: Mr	Title: Miss
First Name: Mike	First name: Claire
Last Name: Stone	Last Name: Pegg
Organisation/company: Bellway Homes Limited (Strategic Land Division)	Organisation/company: Cushman & Wakefield
Address: Bellway Homes Limited (Head Office), Seaton Burn House, Dudley Lane, Seaton Burn, Newcastle upon Tyne, Postcode: NE13 6BE	Address: 1 Marsden Street Manchester Postcode: M2 1HW

[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 ☒ (Via Email)	No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02; LPA05	Paragraph / diagram / table		Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*		
Legally Compliant?	Yes ☐	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 accompanying statement of representations. Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

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

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
	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 assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, Bellway Homes Limited (Strategic Land Division) would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the site at Rainhill Hall Farm. Bellway Homes Limited (Strategic Land Division) do not consider that this can be achieved by relying on the submitted written representations alone.

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

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

CUSHMAN & WAKEFIELD

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

BELLWAY HOMES LIMITED

March 2019

3.0 Green Belt Review

3.1 As part of the Local Plan evidence base, the Council has undertaken a review of the Green Belt (GB). The methodology and assessment results are set out in the Green Belt Review, December 2018.

3.2 The draft Local Plan recognises that a number of sites must be released from the GB for the Council to meet its housing and employment needs.

3.3 Paragraph 4.18.11 of the draft Local Plan acknowledges that the GB Review methodology has resulted in some key settlements not having had any suitable sites identified within or near to them.

3.4 This is particularly the case for Rainhill, which Policy LPA02 identifies as a Key Settlement, where the Policy states sustainable regeneration and growth will be focussed. The supporting text to Policy LPA02 states that land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements and that among other factors, this should take account of past rates of housing delivery in relation to settlement size (paragraph 4.6.8).

3.5 Further, the Spatial Vision sets out the Council's aspiration for the "balanced regeneration and sustainable growth of its built-up areas", with Strategic Objective 5.3 seeking to enhance the vitality and viability of town centres.

3.6 It is significant that no allocations are proposed in Rainhill south of the railway line and it is therefore clear that the GB Review process conflicts with the aspirations of Policy LPA02, the Spatial Vision and Strategic Objectives.

3.7 Paragraph 8.19 of the January 2019 SHMA Update identifies barriers to owner-occupation in St Helens due to access to capital for deposits. The SHMA notes that schemes such as Help-to-Buy can assist with this, alongside other affordable housing products. New build developments on greenfield or GB sites are best placed to meet this affordable housing need as they do not face the same viability issues as smaller, technically constrained or brownfield sites.

Stage 1B Assessment

3.8 We now turn to the Stage 1B assessment of the GB parcels within which the site is located.

3.9 The sites are within Green Belt Parcel (GBP) 090, with the areas of the site north and south of Blundells Lane each occupying approximately a quarter of GBP_090_C and GBP_090_B respectively. Both these sub-parcels scored "high" in the Stage 1B GB assessment and were therefore discounted from further assessment stages.

3.10 The detailed sub-parcel assessments are contained at Appendix C of the GB Review. We consider the assessment to be incorrect and have undertaken a reassessment as set out in the table on the following page.

3.11 When discussing the boundary features, we have referred to Table 2.1 of the GB Review which explicitly states protected woodlands greater than 20m in width should be considered strong boundary features.

3.12 We have also considered paragraph 2.18 of the GB Review which defines "sprawl" as an untidy or irregular spread [of development]. Paragraph 2.19 then states that in determining the extent to which sprawl may occur, the sub-parcel size, proximity to large built up areas (like Rainhill) and other strong physical features should be considered.

Green Belt Purpose	GBP_090_B		GBP_090_C	
	Council Assessment/ Score	**C&W Assessment/ Score**	**Council Assessment/ Score**	**C&W Assessment/ Score**
1. To check the unrestricted sprawl of large built-up areas.	The sub-parcel is bounded to the north by Blundells Lane and agricultural land, to the west by Blundells Hill Golf Course, to the east by Hall Lane, agricultural land and residential development, and to the south by the M62. The sub-parcel is therefore well contained on three sides but remains open to the west. **Score: Medium**	The east boundary of Blundells Hill Golf Course (adjoining the sub-parcel) is demarcated by a strong line of mature trees. This treeline comprises a strong boundary of the site, visually and physically separating the sub-parcel. We therefore consider the sub-parcel is well-contained and bound by strong physical features on all sides. **Score: Low**	The sub-parcel is bounded to the north by the Liverpool to Manchester Railway Line and the large built-up area of Whiston, to the west by Whiston Woods, to the east by residential development and to the south by Blundells Lane, agricultural land and Blundells Hill Golf Club. The sub-parcel is therefore well contained on three sides but remains open to the west. **Score: Medium**	Whiston Woods forms a community woodland owned and operated by the Forestry Commission. It serves an important purpose in maintaining a gap between Rainhill and Whiston and is considered a strong boundary to development. We therefore consider the sub-parcel to be well-contained and bound by strong physical features on all 4 sides. **Score: Low**
2. To prevent neighbouring towns merging into one another	The sub-parcel falls within a strategic gap between Rainhill and Whiston. Albeit Rainhill and Whiston have already partly joined to the north. Development of the sub-parcel would lead to a reduction in the gap between these settlements particularly in the context of the allocated Halsnead Urban Extension in Knowsley. **Score: High**	The Council's assessment acknowledges that Rainhill and Whiston have already merged. Blundells Hill Golf Course forms a strong feature preventing the settlements from merging, alongside Whiston Woods to the north-west (see Figure 2). The land herein being promoted is capable of 'rounding off' the western edge without harming the sub-parcel's overall integrity. Approximately 1km would remain as a gap between Rainhill and Whiston and thus the sub-parcel does have scope for some development. **Score: Medium**	The sub-parcel falls within a strategic gap between Rainhill and Whiston. Albeit Rainhill and Whiston have already partly joined to the north. Development of the sub-parcel would lead to a significant reduction in the gap between these settlements. **Score: High**	The Council's assessment acknowledges that Rainhill and Whiston have already merged. In any case, Whiston Woods is strongly protected from development and alongside Blundells Hill Golf Course to the south forms a permanent landscape feature to prevent the settlements from merging (see Figure 2). The land herein being promoted is capable of 'rounding off' the western edge without harming the sub-parcel's overall integrity. Approximately 750m would remain undeveloped between Rainhill and Whiston and thus the sub-parcel does have scope for some development. **Score: Medium**

3. To assist in safeguarding the countryside from encroachment	The sub-parcel contains agricultural land and buildings (Rainhill Hall and Sandy Carr Farms) and protected woodland (The Rough). The sub-parcel contains very little inappropriate development and has a sense of openness. The M62 to the south and Hall Lane and Blundells Lane have some impact on countryside character. **Score: Medium**	Agreed. **Score: Medium**	The sub-parcel contains residential development along Blundells Lane and Stoney Lane and agricultural land. The sub-parcel contains very little inappropriate development and has a sense of openness southwards and westwards. The nearby residential development, Stoney Lane, Blundells Lane and the railway line all have some impact on countryside character. **Score: Medium**	Agreed. **Score: Medium**
Summary	The sub-parcel is well contained on three sides but remains open to the west. The sub-parcel falls within a strategic gap between Rainhill and Whiston. **Score: High**	The sub-parcel is well-contained and bound by strong physical features on all sides. Whilst the sub-parcel does prevent Rainhill and Whiston from merging further, the Golf Course provides a strong, permanent open feature in the landscape to prevent further merging. A significant distance between Rainhill and Whiston would remain. The sub-parcel is considered to have some scope for development and the development of the sites being promoted would not result in urban sprawl. **Score: Medium**	The sub-parcel is therefore well contained on three sides but remains open to the west. The sub-parcel falls within a strategic gap between Rainhill and Whiston. **Score: High**	The sub-parcel to be well-contained and bound by strong physical features on all 4 sides. Whilst the sub-parcel does act to prevent Rainhill and Whiston from merging further, Whiston Woods provides a strong, permanent open feature in the landscape to prevent further merging and a significant distance between settlements would remain. The sub-parcel is considered to have some scope for development and the development of the sites being promoted would not result in urban sprawl. **Score: Medium**

Figure 2: Strong, permanent features in the GB parcel.

3.13 As set out above, we consider both sub-parcels should have had their overall contribution to the GB assessed as 'medium' and they should therefore have been progressed to Stage 2A.

Stage 2A Assessment

3.14 With reference to Table 2.6 of the GB Review, we have undertaken the Stage 2A assessment for the sub-parcels and considered below whether 'prohibitive constraints' are present at either parcel.

Constraint	**GBP_090_B**	**GBP_090_C**
More than 2/3rds of the sub-parcel is in fluvial flood zones 2 or 3 as defined on the Environment Agency flood risk maps or by high flood risk from other sources	The sub-parcel is entirely located in flood zone 1.	The sub-parcel is entirely located in flood zone 1.
More than 2/3rds of the sub-parcel is covered by a Site of Special Scientific Interest or Local Nature Reserve	The sub-parcel contains no SSSIs or LNRs.	The sub-parcel contains no SSSIs or LNRs.
More than 2/3rds of the sub-parcel is covered by a playing pitch in an area of deficit for such facilities, and there is no identified scope for suitable replacement provision.	The sub-parcel contains no playing pitches.	The sub-parcel contains no playing pitches.
More than 2/3rds of the sub-parcel is covered by an area of public open space, sporting or recreational provision in an area of deficit for facilities of the type which would be lost, and there is no identified scope for suitable replacement provision.	The sub-parcel contains no public open space, sporting or recreational provision.	The sub-parcel contains no public open space, sporting or recreational provision.
More than 2/3rds of the sub-parcel is covered by trees that are covered by Tree Preservation Order or are worthy of preservation	Tree cover in the sub-parcel falls far below 1/3.	Tree cover in the sub-parcel falls far below 1/3.

More than 2/3rds of the sub-parcel is occupied by existing development or landscaping works associated with existing development	More than 2/3 of the sub-parcel comprises agricultural land and buildings.	More than 2/3 of the sub-parcel comprises agricultural land.
There is no reasonable likelihood of a suitable vehicular access being provided from the highways network to support development of the sub-parcel for housing or employment	The sub-parcel adjoins the adopted highway.	The sub-parcel adjoins the adopted highway.

3.15 The above clearly demonstrates that there are no prohibitive constraints to residential development present at either sub-parcel. Both sub-parcels should therefore have been assessed at Stage 2B. (4)

Stage 2B Assessment

3.16 The GB Review does not clearly set out how the assessment of a site against the list of constraints (Table 2.7), transport accessibility and ownership and viability has resulted in a score of good, medium or limited development potential for Stage 2B. (4)

3.17 The lack of transparency in this stage of the GB assessment coupled with a lack of proformas for those sites which were assessed at Stage 2B has rendered it impossible to undertake a comparable and fair Stage 2B assessment of GBP_090_B and GBP_090_C.

3.18 Nonetheless we have briefly considered the sub-parcels against the Stage 2B criteria below. Given the adjacency and similarity of the sub-parcels, the same comments are applicable to both sub-parcels and so we have combined for ease.

- **Constraints** - Further to the Stage 2A assessment, it is not considered that there are any significant or insurmountable constraints to the delivery of some development on the edge of the parcel closest to Rainhill.
- **Transport accessibility** - The sub-parcel adjoins the adopted highway, whereby safe and convenient vehicular access can be provided from Blundells Lane.

  The edge of the sub-parcel is within 800m walking distance of Rainhill centre and Rainhill train station and is close to bus stops along Old Lane and Mill Lane. (4)

  A primary school, high school and college are within safe and convenient walking distance.
- **Ownership and Viability** – The land parcels being promoted for development and adjoining the built-up edge of Rainhill are secured to Bellway Homes via an option agreement. There are no ransom situations and thus no ownership issues to prevent development.

  Bellway Homes are a reputable and highly experienced developer, active in the local market. Bellway Homes are confident that the sites could be viably developed and there are no significant abnormal development costs.

  Preferred Development Type, Developable Area and Notional Development Capacity – The land parcels being promoted by Bellway Homes have a combined capacity of 27.9 acres (11.3 hectares) and a potential capacity of up to 340 new homes.

3.19 It is strongly considered both sub-parcels should have been assessed at Stage 2B of the GB Review and proceeded to the overall ranking and review in Stage 3.

5.0 Conclusion

5.1 These representations have demonstrated that there is a clear case for considering supporting the release of the site from the Green Belt and allocation for residential development.

5.2 The delivery of up to 340 new homes at the site would make a significant and necessary contribution towards the Council's housing need, which as set out in Section 2, should be significantly higher to account for the Council's significant economic growth aspirations.

5.3 The development of the site would also assist in supporting Rainhill as a key settlement, ensuring a fair and balanced distribution of new development in St Helens in accordance with the Spatial Vision and settlement hierarchy set out in Policy LPA02.

5.4 The site presents an appropriate and logical location for development, adjacent to the settlement edge, without causing harm to the wider landscape or threatening the remainder of the Green Belt sub-parcels or wider parcel.

5.5 We consider that the Council incorrectly dismissed the relevant sub-parcels at Stage 1B of the GB Review and should have progressed the assessment through Stage 2 and Stage 3 of the review. Our own assessment of the sub-parcels at these later assessment stages demonstrates that sub-parcel's capacity for some development, principally adjoining the settlement edge of Rainhill.

5.6 We consider that the release of the site from the Green Belt is wholly justified as the scheme will deliver a high quality residential environment, with significant associated socio-economic benefits. The development has a willing landowner and developer, and Bellway are able to start delivering homes at the site in the short term.

5.7 In summary:

- The site is sustainably located, near to a wide range of community services and infrastructure;
- The site is extremely well-located for access to a range of public transport options;
- The site is not subject to any significant technical constraints;
- The development will deliver high-quality market and affordable homes;
- The development would contribute towards meeting the Council's housing land supply, at a time when there is an identified requirement to release land from the Green Belt;
- The proposed development would deliver economic benefits through increased local spend from new residents; job creation during the construction phase; and monies to the Council through Council Tax;
- The release of the site from the Green Belt would not prejudice the preservation of the wider parcel; and
- The land owner and reputable developer are willing and available to deliver homes in the short term.

5.8 The development of the site is strongly considered to comprise sustainable development and accord with national and local planning policy. The proposal can be sensitively designed to ensure there is no significant adverse landscape impact and the desktop review has not identified any insurmountable technical constraints to the delivery of housing. The site is available, suitable and achievable for residential development and we therefore ask the Council to afford strong consideration to the release of this site from the Green Belt as an immediately deliverable allocation.

PO3799

EL0211

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

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.

EL0211

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

Appendix 2 Technical Note – St Helens Green Belt Review

Briefing Note

Our ref 41874/03/SPM/MWl
Date 13 March 2019

Subject St Helens Green Belt Assessment

1.0 Introduction

1.1 This note has been prepared by Lichfields on behalf of Taylor Wimpey UK Ltd to inform its representations to the St Helens Borough Council [the Council] Submission Draft Local Plan [SDLP] consultation. This note reviews the robustness of the Council's Green Belt Review [GBR] (December 2018) which the Council is relying upon to justify the Green Belt land proposed for release in its emerging Local Plan. This note focuses on the general approach taken in the GBR in the context of Taylor Wimpey's land interest in the Borough.

1.2 This note should be read in conjunction with the accompanying representations prepared by Taylor Wimpey on the St Helens Local Plan. Taylor Wimpey's interests in St Helens only relate to residential development and as such, the focus of this note is on Green Belt land released for residential development.

The St Helens Borough Submission Draft Local Plan 2020-35

1.3 In January 2019, the Council released its SDLP (2020-2035) for consultation. A key role of the SDLP is to plan positively to ensure the communities needs for housing and employment are met. The Council has acknowledged that there is a shortfall of suitable and developable land within its existing urban areas (and in urban areas of neighbouring authorities) to meet the needs over the plan period. As such, the Council consider that the lack of sufficient supply of development land represents exceptional circumstances. This therefore justifies the Councils review of the Green Belt boundaries within the Borough.

1.4 It has been established in the SDLP that at least 9,234 dwellings will be needed to meet local needs up to 2035. Of this it is anticipated that land to accommodate up to 2,034 dwellings must be released from the Green Belt. It should be noted that Taylor Wimpey consider that the housing requirement should be higher than that set out in the Local Plan.

1.5 The current proposed plan period for the SDLP is 15 years, between 2020 and 2035. As noted in the response to the representations (Policy LPA05), Taylor Wimpey believe that in line with the Framework[1] this should be extended as it does not currently allow for any flexibility in the event of delays in the adoption process. Elongating the plan period would result in the requirement to identify additional land (above that set out in the SDLP) to be removed from the Green Belt to meet the additional needs.

Taylor Wimpey's Interests

1.6 Taylor Wimpey has two sites that have been allocated for residential development in the SDLP:

[1] The Framework 2019 - §22

1 Land at Gorsey Lane (Site reference: 4HA-Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb); and,

2 Land at Gartons Lane (Site reference: 5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold).

Taylor Wimpey's Vista Road site is also proposed to be removed from the Green Belt but is safeguarded for future development rather than allocated for residential development in this plan period.

1.7 Taylor Wimpey fully supports the draft allocation of these two sites and welcomes the Council's acknowledgement that they perform limited Green Belt purposes, are not constrained, and are deliverable sites which should be allocated to meet the Borough's housing needs.

1.8 Taylor Wimpey is seeking to secure further allocation of the following two sites for residential development in the SDLP:

- Vista Road, Newton-le-Willows; and,
- Common Road, Newton-le-Willows.

Taylor Wimpey has prepared masterplans for all of its land assets in St Helens and these masterplans are appended to the overall representations on the St Helens Local Plan.

Vista Road, Newton-le-Willows

1.9 It is noted that a small parcel of the Vista Road Site (southern most area) has a draft allocation as Safeguarded Land in the SDLP (Site Reference: 2HS). In the previous Submission Draft the wider site was allocated for residential development with the eastern area allocated as Safeguarded Land.

1.10 A Vision Statement has been completed for the Vista Road site; and submitted with representations to earlier iterations of the Local Plan to assist the Council in their approach to the assessment of the site as part of the GBR. The Vision Statement identifies that the site is appropriate for future development because:

1 It will remove a site which logically forms part of the surrounding urban area on the northern edge of Newton-le-Willows and will consolidate existing residential development in the area.

2 It would not result in the unrestricted sprawl of Newton-le-Willows nor would it result in the merging of any settlements. The site does not perform an important strategic gap role between Haydock and Newton-le-Willows and has existing defensible boundaries which support its release.

3 It does not have any impact on the preservation of the setting of any historic town and Newton-le-Willows is not a nationally recognised historic town.

4 It will not prevent the recycling of brownfield land, but will be complementary to it as there is insufficient previously developed land in the Borough to meet future housing and employment needs. The Council accepts that Green Belt is required to accommodate the SDLP development requirement as well as its needs beyond the Plan period.

Common Road, Newton-le-Willows

1.11 The Common Road site has also been put forward by Taylor Wimpey. A masterplan was submitted in support of residential development on this site. Taylor Wimpey believes that this

site also performs a limited contribution to the purposes of the Green Belt. Taylor Wimpey has already built out the area immediately to the east of the site (the Whittle Chase development) and as such it would form a natural and logical extension to the western edge of Newton-le-Willows. It would deliver a high quality, sensitively designed, landscaped urban edge to the settlement.

1.12 The Masterplan shows that the site is appropriate for future development because:

1 Currently the Green Belt is not defined by any physical landscape features at the urban edge. The establishment of a wooded buffer as proposed by Taylor Wimpey at the perimeter of the site will create a strong and permanent defensible Green Belt boundary to the adjacent open countryside that ties into the existing physical landscape features to the north and south of the site.

2 The existing high-pressure gas pipeline which passes along the western edge of the site will prohibit any future urban expansion to the west beyond the Common Road site. This constraint further ensures that the edge of the development will provide a firm and defensible boundary to the western edge of Newton-le-Willows, and the adjacent Green Belt designation.

3 As noted above, it does not have any impact on the preservation of the setting of any historic town as Newton-le-Willows is not a nationally recognised historic town; nor does it prevent the recycling of brownfield land.

2.0 Analysis of the Green Belt Review

2.1 Whilst there is no single method for undertaking Green Belt Reviews, the general approach set out by the Council is supported, although Taylor Wimpey has some queries and concerns over the assessment conclusions.

Defining Green Belt Parcels

2.2 The GBR has used existing boundary features to define Green Belt parcel boundaries. Taylor Wimpey has the following concerns in respect of the boundary features that have been used:

1 It appears that underground features that are not readily identifiable (such as pipelines) have been excluded from Table 2.1. Whilst it is acknowledged that these features do not contribute in visual or openness terms, Taylor Wimpey considers that these do represent long-term, defensible boundaries that provide permanent barriers to development. As such, they should be categorised as a "strong" boundary feature.

2.3 In addition, Taylor Wimpey considers that the parcels of land should have also been identified by land ownership to provide a more balanced assessment of the contribution of this land to the purposes of the Green Belt and its actual deliverability.

2.4 Taylor Wimpey considers that in respect of the Common Road site, the inclusion of the "pipelines" as strong boundary features and reference to land ownership boundaries, would have allowed Green Belt parcel GBP_057_A (shown in Figure 3) to be further broken up to separate the Common Road site from the area to the west which includes Sankey Valley Park. This would provide a more logical parcel for assessment and the remainder of this parcel could then be assessed separately. Furthermore, St Helens Council should be looking for a range of sites, including smaller and medium-sized sites that can come forward quicker to deliver housing. For Vista Road, the inclusion of the pipeline as a defensible boundary would also have

strengthened the sites assessment against the purposes of the Green Belt and Taylor Wimpey cannot see why the underground pipeline has not been factored into the assessment.

2.5 It is suggested that a re-assessment of these sites should be undertaken taking into account those points above and the discussion below.

Consistency in the Assessment and Selection of Sites for Release

2.6 Taylor Wimpey notes that the justification and overall assessment for some of Taylor Wimpey's sites has changed between the 2016 GBR and 2018 GBR as shown at Table 1. For Common Road and Vista Road, there does not seem to be adequate explanation for why this is the case. It is, however, difficult to fully compare the two as the methodology has been amended for the 2018 GBR. This now includes a new Stage 3 'review of results' and the overall assessment is given a number rather than a ranking. The 2016 GBR considered that both sites were appropriate for release. No reasoned justification is provided as to why the Common Road site and part of the Vista Road site is no longer considered appropriate for release.

2.7 Nonetheless it is clear to see that the allocations for these sites have changed considerably between the two assessments, whilst Gorsey Lane and Gartons Lane have remained largely unchanged.

Table 1 Assessment of Taylor Wimpey Land Interests

Green Belt Assessment 2016	Overall Assessment	Green Belt Assessment 2018	Overall Assessment
Land at Vista Road (GBS_037)	Allocated as Residential Development - HA7	**Land at Vista Road** (GBP_053_C)	Part Safeguarded Land and part Green Belt
Land at Vista Road (GBS_036)	Safeguarded Land - HS07	**Land at Vista Road** (GBP_051_A)	Green Belt
Land at Common Road (GBS_158)	Safeguarded Land – HS06	**Land at Common Road** (GBP_057_A)	Green Belt – *Discounted at Stage 1B*.
Land at Gorsey Lane (GBS_051)	Safeguarded Land – HS03	**Land at Gorsey Lane** (GBP_074_D)	Allocated for Residential Development as part of a wider parcel of land – 4HA
Land at Gartons Lane (GBS_050)	Allocated as Residential Development – HA5	**Land at Gartons Lane** (GBP_080)	Allocated for Residential Development – 5HA

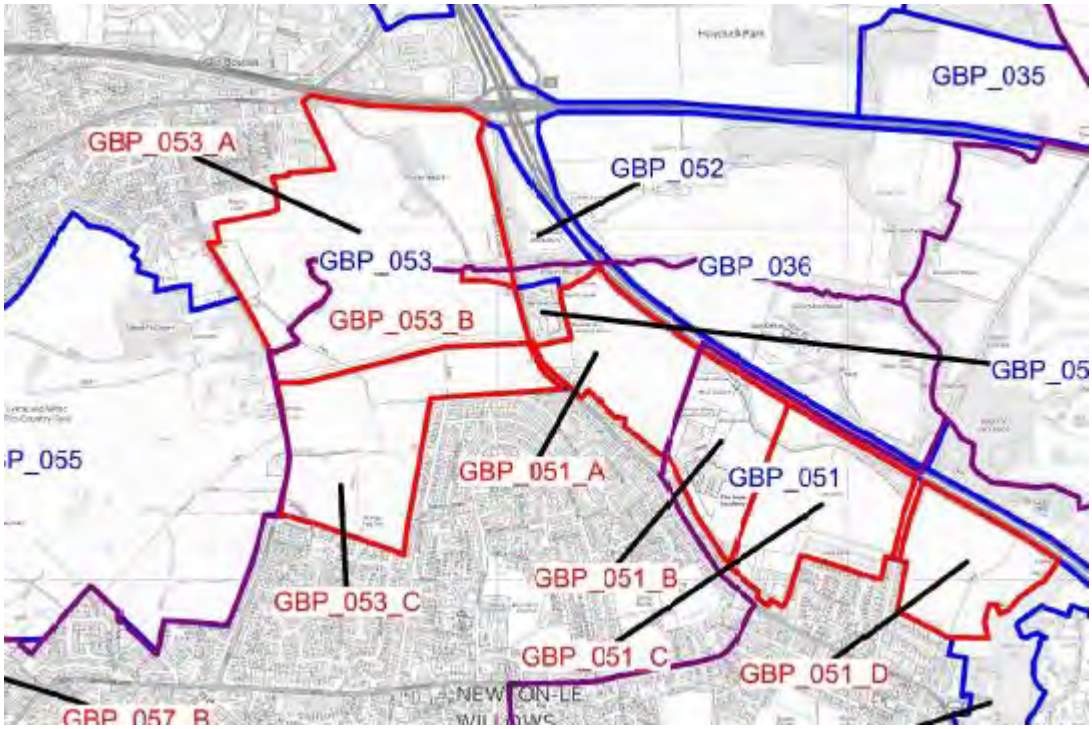
Source: Lichfields

2.8 In respect of Vista Road, whilst the individual parcel references have changed, the boundaries of the above land parcels in the 2016 and 2018 GBRs are largely the same. The 2018 GBR splits the Vista Road site across three parcels (GBP_053_B, 053_C and 051_A, as shown at Figure 1.

This note excludes parcel GBP_053_B as it is proposed this area would comprise an extension to the Country park rather than be promoted for residential development.

Vista Road (2018 Ref:053_c) - Part allocated as Safeguarded Land

Figure 1 Vista Road - GBR 2018 References 053_C and 051_A



Source: St Helens Borough Local Plan Green Belt Review December 2018

2.9 Turning to a review of the Green Belt purposes 1 to 3, as assessed in the GBR, Taylor Wimpey would note the following:

Purpose 1 – To check the unrestricted sprawl of large built-up areas:

2.10 The 2018 GBR reviews Parcel 053_C as "*being bound on 3 sides by strong boundaries; with a single temporary highway to the north*". It is noted that a certain amount of development could be accommodated without it leading to unrestricted sprawl as it prevents ribbon development along Ashton Road and Vista Road. It is assessed as making a "*Medium*" contribution to this purpose. The justification in the 2016 GBR is similar (albeit briefer) and notes the site is well contained on three sides; however, this is given an assessment of making a "*Low*" contribution. It is unclear why this justification has changed. Taylor Wimpey considers that the removal of parcel 053_C will not result in the unrestricted sprawl of large built up areas for the following reasons:

- It is accepted that a large portion of the parcel is surrounded by development which forms part of the existing urban area;
- The temporary access road provides an opportunity to deliver a strategic link road with appropriate landscape treatments which will provide a long term defensible boundary between Vista Road and Ashton Road; and,
- The pipeline to the west of the site provides a strong, defensible boundary.

Purpose 2 – To prevent neighbouring towns merging into one another

2.11 The parcel is given a "*Medium*" contribution to Purpose 2; as it forms a 'strategic gap' (with parcels 53_a and 53_b) to the physical and visual separation of Haydock and Newton-le-Willows, although it is noted that should the other parcels remain; then the strategic gap would still be retained. The 2016 GBR also acknowledges the 'strategic gap' between Haydock and Newton-le-Willows. Taylor Wimpey considers that the sites contribution to this purpose is low as the landform ties it to the urban area, and given the higher ground to the north, it has visual separation from Haydock; thereby not contributing to the strategic gap.

Purpose 3 – To assist in safeguarding the countryside from encroachment

2.12 The parcel is given a "*Medium*" contribution to this purpose as there" *is no built development and it has a semi-rural character when viewed against the existing urban fringe*". The 2016 GBR noted that the site was over 2/3rds enclosed and it is noted as providing a "Low" contribution to this purpose. Again, it is not clear what the justification is for the change in assessment. Taylor Wimpey believe that the removal of this parcel will not contravene the purpose of safeguarding the countryside from encroachment as:

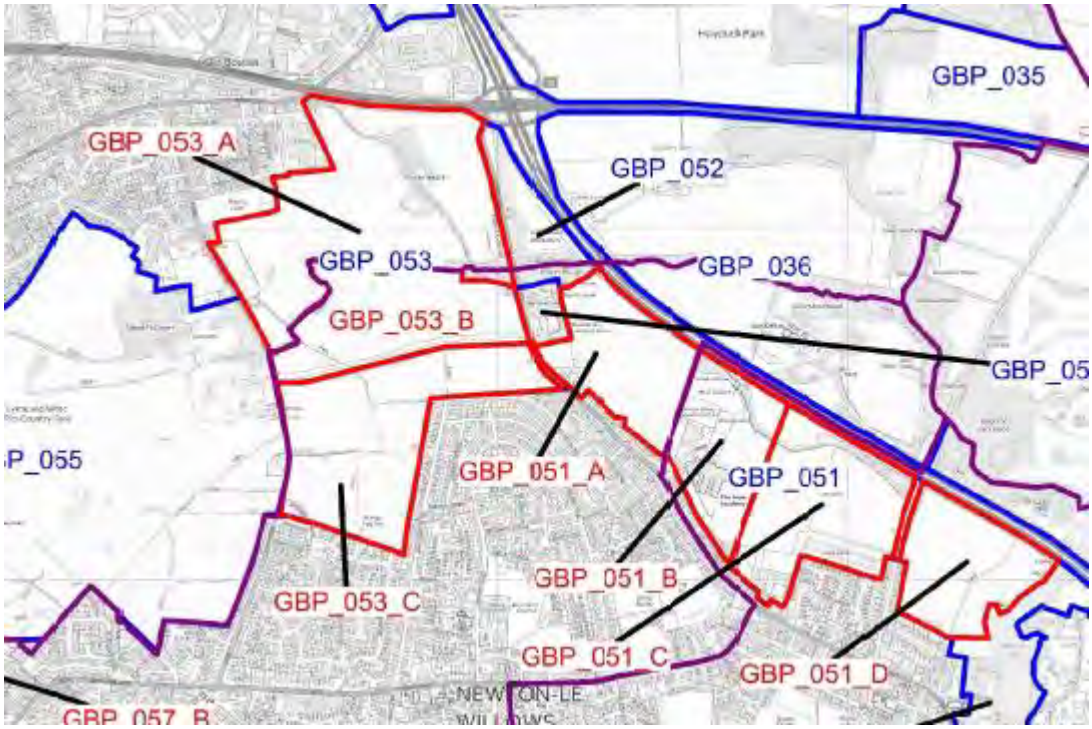
- It is dominated by existing built development being defined by existing boundaries including roads and residential development.
- It would result in the delivery of a natural extension to the existing built up area of Newton-le-Willows and not extend into the countryside much beyond the existing built development.

Overall

2.13 The overall comments in the 2018 GBR notes that "*although a large part of the sub-parcel was proposed by the Council as an allocated site at LPPS stage, a number of constraints affect it that would have significant impact on the NDA and the deliverability of the site. These constraints, considered in the context of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this sub-parcel*". As noted above, Taylor Wimpey has shown that the site serves limited contribution to the Green Belt purposes and is available, suitable and deliverable for housing. It will not encroach into the countryside and it has existing and potential strong, permanent boundaries on all sides of the site. The GBR notes there is a potential for impact on J23 of the M6; however, the additional link road (as shown on the masterplan) will alleviate pressure on the motorway.

Vista Road (2018 Ref: 051A) - remain in Green Belt

Figure 2 Vista Road - GBR 2018 References 053_C and 051_A



Source: St Helens Green Belt Review December 2018

2.14 In respect of this parcel of Vista Road, following a review of Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

Purpose 1 – To check the unrestricted sprawl of large built-up areas:

2.15 The site is considered to serve a "*Low*" contribution to Purpose 1 in both the 2016 and 2018 GBRs given it has strong boundaries that would ensure development containment. Taylor Wimpey agrees with this assessment.

Purpose 2 – To prevent neighbouring towns merging into one another

2.16 The 2018 GBR assesses the site as serving a "*Medium*" contribution to this purpose, this is because the western edge of the parcel is noted as "*broadly contributing to the physical and visual separation of Haydock and Newton-le-Willows*". Considered against the remaining parcels in GBP_051 which all score "low" it is not considered this is assessment is correct. The 2016 GBR assessed this parcel as having a "*Low*" contribution as there is a wide gap between Haydock and Newton-le-Willows. Taylor Wimpey do not believe this is an important "strategic" parcel as it does not contribute to the functional separation of Newton-le-Willows and Haydock.

Purpose 3 – To assist in safeguarding the countryside from encroachment

2.17 The site is again scored as having a "*Medium*" contribution to this purpose in the 2018 GBR as it has a semi-rural character due to encroachment from existing urban development on three of its four sides. The 2016 GBR scored this as "*Low*" as more than 2/3rd of the site is enclosed by built

development. It is not clear why this scoring has changed. Taylor Wimpey consider this site does not contribute to the open nature of the countryside.

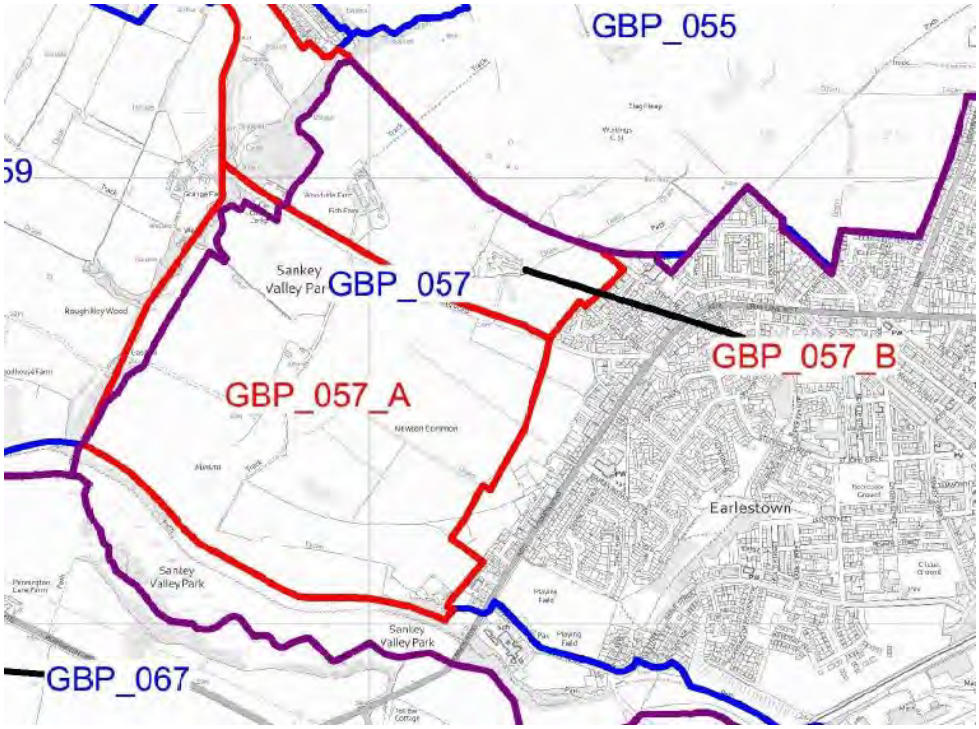
Overall

2.18 The overall discussion is similar to that for Parcel 053c in that it is no longer considered that the 'constraints' justify an allocation as a result of the reduction in housing numbers. The Council raises concerns in respect of constraints; however, Taylor Wimpey consider the site to be fully deliverable.

2.19 Taylor Wimpey considers that the allocation of both parcels of land comprising the Vista Road site provides a more logical extension to Newton-le-Willows and will result in a comprehensively masterplanned development that maximises the site's full potential.

Common Road (2018 Ref: 057A) – Remain in Green Belt

Figure 3 Common Road Parcel - GBR 2018 Reference 057A



Source: St Helens Green Belt Review December 2018

2.20 For Common Road, the 2016 GBR reviewed the Taylor Wimpey site as two separate parcels (2016 GBR Ref: GBS_158 and GBS_127; Parcel GBS_127 was subsequently taken out of the Green Belt and has now been developed by Taylor Wimpey). The 2018 GBR reviewed the Common Road site as part of a much wider parcel of land.

2.21 In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

Purpose 1 – To check the unrestricted sprawl of large built-up areas:

2.22 In the 2018 GBR, the wider parcel scored a "High" contribution to this purpose as a result of weak boundaries (other than the eastern side adjoining Common Road). The parcel is

considered to have a strong sense of countryside character with open views; with a lack of containment leading to a potential sprawl. The 2016 GBR assessed this site as "*Medium*" as it was partially contained to the west by woodland and east by Newton-le-Willows/Earlestown. Taylor Wimpey considers that when considered on its own, the introduction of a woodland buffer around the perimeter of the site would create a strong and defensible Green Belt boundary. Similarly, the pipeline adjacent to the western boundary of the site restricts development in this direction and provides a long term boundary to the western edge of the site.

Purpose 2 – To prevent neighbouring towns merging into one another

2.23 The parcel was assessed as making a "High" contribution to this purpose in both the 2016 and 2018 GBRs as it '*forms a significant strategic gap between Haydock and Earlestown*". Taylor Wimpey considers that the Common Road site, on its own, forms a natural extension to the residential development to the west of Newton-le-Willows; and the implementation of landscape treatments will strengthen Green Belt boundaries in this area to prevent the merging of settlements.

Purpose 3 – To assist in safeguarding the countryside from encroachment

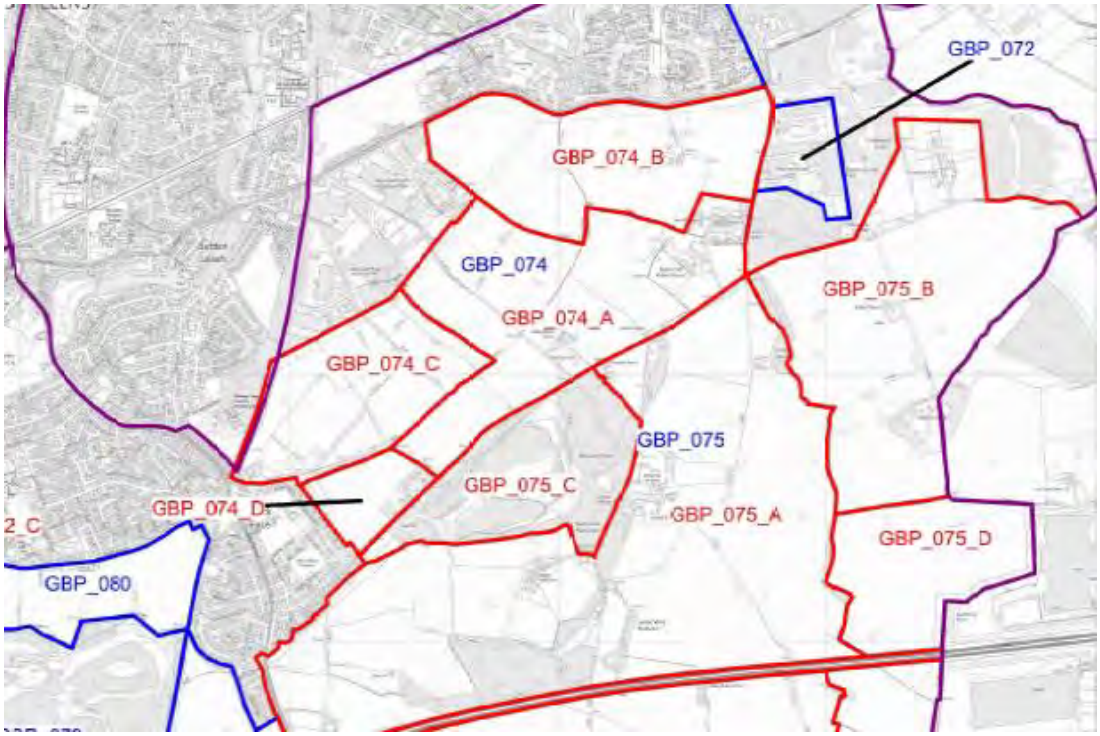
2.24 The parcel was scored as making a "*High*" contribution to this purpose in the 2016 and 2018 GBR as it has a strong rural, open character where any development is likely to give rise to significant encroachment. Although it is acknowledged by Taylor Wimpey that the site has a semi-rural character, the development of Whittle Chase gives the eastern boundary a relatively urban appearance and it is considered that appropriate landscaping of the western edge of the site will provide a high-quality transition between the urban and rural landscape.

Overall

2.25 As the site was not taken forward past Stage 1B in the 2018 GBR it was not given an "overall" commentary. Taylor Wimpey considers that separating this site from the wider site and incorporating the pipeline as a boundary demonstrates the site no longer fulfils the purposes of the Green Belt.

Gorsey Lane (2018 GBR Ref: 074_D) – Allocated for Housing as part of Parcel 074

Figure 4 Gorsey Lane - GBR 2018 Reference 074_D



Source: St Helens Green Belt Review December 2018

2.26 The 2016 and 2018 GBRs assessed the same extent of land, however the overall justification in the 2016 GBR was included as part of the wider 074 parcel. In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

Purpose 1 – To check the unrestricted sprawl of large built-up areas:

2.27 The 2018 GBR assessed the site as providing a "*Low*" contribution to this purpose; with Gorsey Lane to the south, the urban area to the west, tree lined boundary to the north and a strong field line to the west providing strong boundaries. The 2016 GBR assessed the purposes against the wider parcel (Ref: 074) which assessed this purpose as "*Low*". Taylor Wimpey would agree with this assessment as the site benefits from clearly defined physical boundaries.

Purpose 2 – To prevent neighbouring towns merging into one another

2.28 The 2016 GBR assessed the site as having a "*Medium*" contribution to this purpose as it was part of a wide gap when considered as the wider parcel. The 2018 GBR however, assessed this site making a "*Low*" contribution as "*although it sits on the urban edge of Clock Face (Bold), it provides little or no discernible contribution to the merging of Bold with any other settlement*". Taylor Wimpey support the 2018 GBR assessment of this parcel.

Purpose 3 – To assist in safeguarding the countryside from encroachment

2.29 The site was assessed as "*Low*" in the 2016 and 2018 GBRs as although it is fairly open, the perception of openness is weak and limited when considering the strong boundaries, visible urban development and the planning permission for properties on the site of the former colliery

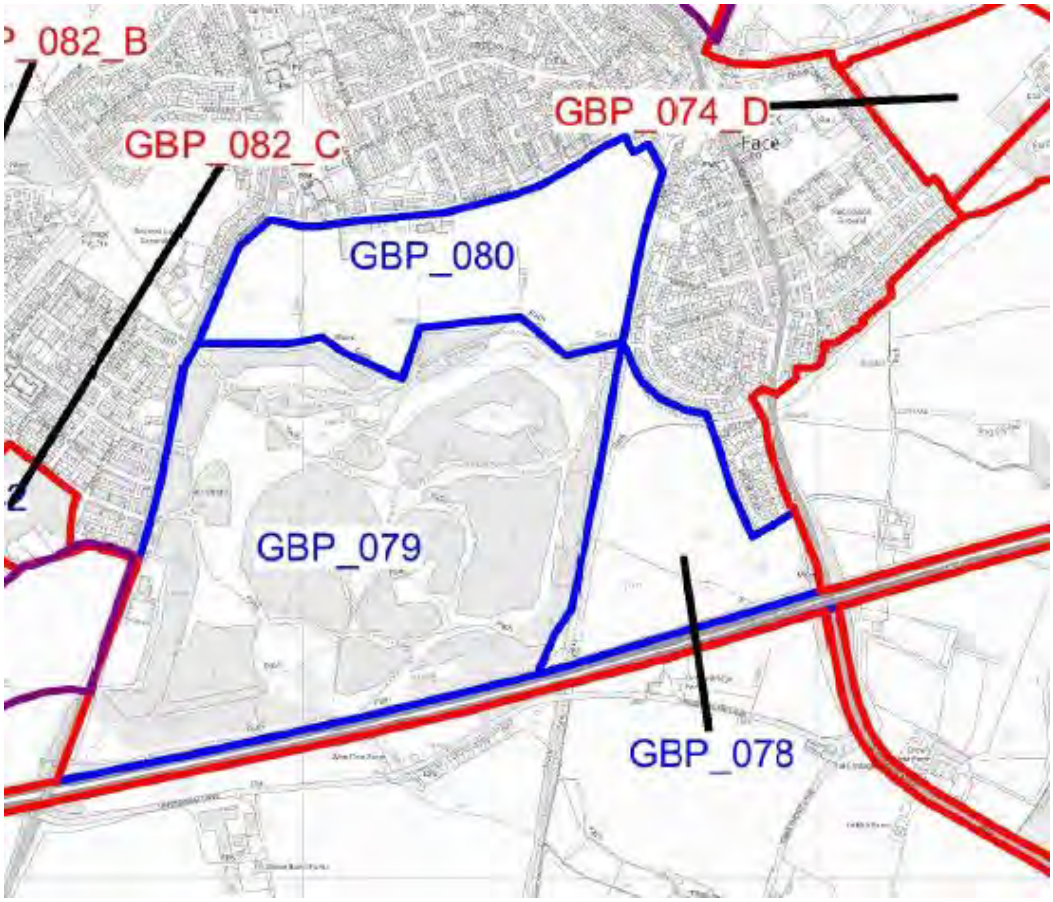
building. Taylor Wimpey agree with this assessment as Gorsey Lane comprises a natural extension to the urban area and would not contravene this purpose.

Overall

2.30 The overall assessment in the 2016 GBR was that the site (as part of the wider parcel of land) provided a "*Low*" contribution to the Green Belt purposes. This was supported in the 2018 GBR which asserts that the site plays a "*limited role in the outward expansion of Bold into the countryside and plays no real part in a strategic gap*". The 2018 GBR notes that it was allocated as "safeguarded" in the previous iteration of the Local Plan largely due the wider site being spread across different land ownerships. However, it is acknowledged that as each of the parcels has been actively promoted, ownership issues are not considered significant. Taylor Wimpey supports the assessment of this site given it no longer fulfils its purpose as Green Belt land and is a suitable and deliverable site for housing.

Gartons Lane (2018 GBR Ref: 080) – Allocated for Residential Development

Figure 5 Gartons Lane - GBR 2018 Reference 080



Source: St Helens Green Belt Review 2018

2.31 In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

Purpose 1 – To check the unrestricted sprawl of large built-up areas:

2.32 The 2016 GBR assessed the site as providing a "*Medium*" contribution to this purpose as it is well contained with housing to the north and east and woodland to the south. The 2018 GBR assesses the site as having a "*Low*" contribution to this purpose given it has strong boundaries and should not lead to unrestricted sprawl. Taylor Wimpey agree with the 2018 GBR assessment as the site is substantially contained by built development.

Purpose 2 – To prevent neighbouring towns merging into one another

2.33 The 2016 GBR assessed this parcel as making a "*Medium*" contribution to this purpose as settlements have already merged to the north of the parcel. The 2018 GBR amends this to a "*Low*" contribution given that the two settlements are not considered as "large built up areas" in the context of the GBR and Taylor Wimpey support this clarification in the 2018 methodology.

Purpose 3 – To assist in safeguarding the countryside from encroachment

2.34 This was assessed as making a "*Low*" contribution to this purpose in the 2018 GBR ("*Medium*" in the 2016 GBR). The justification being that the site is fully enclosed with urban features and residential development is clearly visible when viewed from the south, east and west, therefore Taylor Wimpey support this assessment as development of the site will not have a significant impact on the countryside.

Overall

2.35 The overall assessment in 2016 and 2018 GBRs was that the site makes a "*Low*" contribution to the Green Belt purposes, is in a sustainable location and would form a natural extension to the existing urban settlement. Taylor Wimpey fully support this assessment as its release would not conflict with the purposes of the Green Belt and its proximity to services and facilities ensures it is entirely suitable for a residential allocation.

General Comments

2.36 Notwithstanding the above, as evidenced in Taylor Wimpey's representations on the SDLP and the supporting Technical Review of the SHMA; Taylor Wimpey has concerns over the evidence base underpinning the OAN calculation. It is considered that there is a misalignment between the economic growth aspirations and the housing supply to support this objective; as such Taylor Wimpey believes that St Helens should be considering a higher housing requirement figure. This would have a knock-on effect in terms of requiring additional land to be released from the Green Belt.

2.37 As detailed above, taking into account Taylor Wimpey's comments on the methodology and assessment of the wider Vista Road and Common Road sites, it is considered that these two sites serve a limited Green Belt function and should also be released from the Green Belt to meet St Helens future housing need. Finally, Taylor Wimpey considers that the small parcel of land currently occupied by the farm buildings fronting Gartons Lane should be included in the overall Gartons Lane allocation and can see no reason for its exclusion.

3.0 Conclusion

3.1 Having regard to the Framework, Taylor Wimpey largely supports the methodology as set out in the GBR, however it does have concerns regarding some of the assessment conclusions. Taylor

Wimpey strongly supports the removal of the Gorsey Lane and Gartons Lane sites and their allocation for housing (SDLP Reference: 4HA and 5HA) to meet the needs of St Helens.

3.2 Based on the comments above, Taylor Wimpey believes the assessments for the wider Vista Road site and the Common Road site are not justified and that these sites should be allocated to meet housing need. As noted in Taylor Wimpey's representations on the Local Plan and the supporting Technical Review of the SHMA, Taylor Wimpey believes that the current evidence base for the OAN is not robust or sound and is likely to need further review.

3.3 Taylor Wimpey would strongly support the allocation of its sites at Vista Road and Common Road if further land is required for release from the Green Belt. It is shown above the both sites are available and deliverable and serve a limited contribution to the Green Belt purposes. If an allocation for housing is not considered appropriate at this time, then these sites should be allocated as Safeguarded Land.

3.4 Taylor Wimpey would recommend that following a review of the housing figures, the Green Belt Review is updated.

PO3800

4HS

EL0216

Representations on behalf of Jones Homes (North West) Limited - Submission Draft
Lorraine Robertson
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:49

[redacted]

1 Attachment

27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

1 - LPA02
2 - LPA05
3 - LPA05 - TABLE 4.6
4 - GBR
5 - HERITAGE IMPACT ASS
6 - LPA06
7 - APPENDIX 4 MONITORING FRAMEWORK
8 - SHLAA
9 - LPA04

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson
Senior Planner
[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: Mr
First Name:	First name: Vincent
Last Name:	Last Name: Ryan
Organisation/company: **Jones Homes (North West) Ltd**	Organisation/company: Barton Willmore
Address: **c/o Agent**	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester
Postcode:	Postcode: M3 3BZ [redacted]

Signature: [redacted] **Date:** 13 March 2019

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

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

Yes ☒ (Via Email) No ☐

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

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)				**Green Belt Review 2018** 4					

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

See separate document.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR
13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 – SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange – 153 units
- Eccleston Grange – 283 units
- Former Caremlite Monastery – 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.

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Land East of Newlands Grange, Newton-le-Willows

-4HS

Jones Homes' ("our Client") primary land interest in respect of the Local Plan relates to Land to the East of its recently completed Newlands Grange development at Newton-le-Willows. This 15.6 hectare site has been promoted by our Client throughout the preparation of the Local Plan.

In response to the Local Plan Preferred Options Consultation (December 2016 to January 2017), which identified our Client's land at Newton-le-Willows as a Safeguarded Housing Site (Site Ref: HS14) capable of accommodating 291 dwellings, our Client submitted detailed representations to the Council promoting the deliverability of the Site. This included a desktop published Development Framework document, which was updated in May 2018 following further discussions with the Council. The document addressed the potential constraints of the Site and provided a strong framework for delivery, including a neighbourhood connectivity and facilities assessment and an Illustrative Masterplan. The document provided evidence of the economic, social and environmental benefits that the Site could deliver, as well as a development trajectory, to demonstrate that the Site could, if allocated, be delivered within the Local Plan period, including completions within the first five years of Local Plan period.

The Development Framework Document and accompanying representations from the Preferred Options stage are enclosed with this letter.

Scope of Representations

Notwithstanding our Client's previous submissions, the Submission Draft Local Plan ("SDLP") has retained the allocation of Land East of Newlands Grange as Safeguarded Land under policy LPA06. Table 4.7 of the SDLP lists the Site as reference *4HS: Land East of Newlands Grange (former Vulcan works) and west of the West Coast mainline, Newton-le-Willows.* The SDLP, whilst retaining the status of the Site from the Preferred Options document, has reduced the Site area from 15.56 hectares to 9.76 hectares. These representations comment on the evidence relied on by the Council to justify the reduction in site area, and conclude that the required justification is not provided.

According to the *St Helens Borough Local Plan 2020-2035 Green Belt Review (December 2018)*, the Site has a 'low' significance to Green Belt purposes, but is only rated 'medium' (as opposed to 'good') in terms of development potential. This results in a site score of 5 out of 6, which places it in the Tier 2 group of sites, which have less potential for housing allocation than Tier 1 sites. These representations analyse the reasons for this scoring and address them accordingly in order to demonstrate that the Site should be determined as having a 'good' development potential, thereby falling within the Tier 1 group of sites.

In addition to the above site specific issues, whilst our Client is generally supportive of the SDLP there are some strategic policies that require further justification or revisions in order to be considered sound. There are also areas of the SDLP evidence base that are not sufficiently up-to-date. Finally, our Client does not consider the Monitoring Framework of the SDLP to be appropriate and adequately justified.

Site Specific Matters

The December 2018 Green Belt Review, referenced above, identifies the Site subject of our Client's interests as sub-parcel reference *GBP_044: Land West of the West Coast mainline and East of Newlands Grange.*

At this juncture, we highlight that site referencing throughout the Council's evidence base and the progress of the Local Plan has been inconsistent and is potentially confusing. For example, our Client's Site has been labelled as reference 'HS14', 'GB3_067', 'GBP_044' and now '4HS'. It is imperative that the public, stakeholders, promoters and the examining Inspector is able to clearly track the Council's assessment process, linked to the various evidence base assessments; but the inconsistent referencing throughout the process creates the potential for confusion and mis-understanding.

Returning to the Green Belt Review, Table 5.3 of the document summarises the ranking attributed to each residential Site. Under the Stage 1B Score, our Client's Site is concluded as having a 'low' significance to Green Belt purposes, thereby scoring 3 out of 3 under the Stage 3A ranking. Our Client supports this conclusion.

Under the Stage 2A assessment, our Client's Site is not identified as having any prohibitive constraints to development.

Development Potential

Under the Stage 2B developability assessment, as highlighted above, our Client's Site is categorised as having a 'medium' development potential, thereby scoring 2 out of 3 under the Stage 3A ranking. Table 5.4 of the Green Belt Review sets out the reasons for this conclusion, which is referred to as the Stage 3 refinement exercise. Table 5.4 states that the *'highway network in the surrounding locality has a number of constraints'.* It then goes on to state:

> *'For example, Alder Root Lane, which links this area of Newton to the Warrington to the south* (sic)*, is a narrow country lane (single track in places) which includes an awkward bridge under the railway. The highway issues in the area are likely to prove difficult to fully address. Therefore further work on the surrounding highway network is likely to be required before the extent of development potential within the parcel can be confirmed.'*

By citing the above as an example, the suggestion of using such text is that there are additional issues. However, no further highway constraints are referenced in the Council's assessment. Consequently, we must assume that there are no further matters of concern. In addition, it is not clear whether the above conclusions are supported by robust technical highways evidence. Without confirming this, the evidence base cannot be regarded as robust.

In contrast, to this lack of technical evidence, our Client has instructed Focus Transport Planning to review the Table 5.4 comments, set out above, and provide a Transport Representations Appraisal in response. The Technical Note concludes that the Council's concerns in relation to the surrounding highway network are unfounded, and, consequently, highway constraints do not prohibit the developability of the Site. In summary, the Appraisal concludes the following:

- The Site benefits from a wide range of sustainable travel opportunities for future residents;
- The Site benefits from convenient access to key local facilities and services via existing local walking and cycling infrastructure;
- The surrounding highway network has a predominantly positive safety record;
- In granting planning permission for the adjacent Newlands Grange development, the Secretary of State and Inspector considered the surrounding highway network to be suitable for accommodating the development of circa 630 dwellings;
- The restricted geometry of the road network to the south of the Site means that traffic travels at lower speeds, with higher levels of awareness, resulting in an acceptable level movement; and
- Predicted vehicular trips from the Site are not expected to be substantive enough to have any material effect on sensitive local highway network links.

It can therefore be concluded that **there are no highway constraints that act as a barrier to the Site's development**.

Table 5.4 also refers to the need for attenuation measures being required to limit noise from the railway line along the eastern boundary of the Site. It is not clear whether the Council considers this to be a factor affecting the developability of the Site, and subsequently the scoring attributed to the Site under stage 2B. However, we can confirm that this issue has already been factored into our assessment of the Site's deliverability set out in the enclosed Development Framework. The Illustrative Masterplan contained within the Development Framework incorporates a 20m 'no-development' easement, as does the updated Masterplan enclosed separately with these

representations. Such an easement is a commonly applied design mitigation when developing adjacent to a railway line. We can also confirm that our Client has delivered a number of successful developments adjacent to railway lines, including the West Coast Mainline, and is therefore well-versed in providing the necessary mitigation. We can therefore conclude that our Client's assessment of the potential yield of the Site, and the Illustrative Masterplan, already takes account of the necessary attenuation measures required to mitigate noise from the West Coast Mainline.

Development Potential – conclusions

On the basis of the above conclusions, and those set out within the enclosed documents, including the Development Framework and Highways Appraisal, **we do not consider there to be a sound evidential basis for the Council's conclusions set out in Table 5.4 of the Green Belt Review**. There are no constraints to the Site's development that call into question its developability. On this basis, the Site's Stage 2B score should be categorised as 'good', thereby scoring 3 out of 3 under the Stage 3A ranking.

Table 5.4 of the Green Belt Review concludes that the Site has strong defensible boundaries and is in a sustainable location. The enclosed Development Framework provides further evidence of the Site's sustainable location and its links to 2 x nearby railway stations, pedestrian linkages, shops and services and sources of employment. On this basis and having addressed the Council's conclusions in relation to developability, the Site should in fact score 6 out of 6 in the overall Green Belt Review assessment, placing it in Tier 1 in the tier ranking of overall scores. Whilst a score of 6 does not automatically mean that the Site should be allocated for housing, to do so would be consistent with the Council's approach to selecting site allocations set out within the Green Belt Review.

Development Area

As highlighted above, the Council has reduced the overall Site area of Land East of Newlands Grange from 15.56 hectares to 9.76 hectares, between the Preferred Options and SDLP documents. This follows as assessment of the potential impact of the development of the Site upon the Vulcan Village Conservation Area, to the west of the Site.

Table 5.4 of the Green Belt Review states that in response to the Preferred Options consultation, Historic England ("HE") expressed concerns about the impact that the development of the Site would have on the setting of the Conservation Area. As a result, the Council undertook a Heritage Impact Assessment ("HIA"), which concluded that the extent of any development would need to be limited to mitigate the impact upon the Conservation Area. This in turn resulted in a reduction in the Site area, which the Council considers to be justified in light of *'the need to address the issues raised by HE'*. Having undertaken a review of HE's representations to the Preferred Options consultation (enclosed), we can confirm that the entire basis for the Council's review of this matter is completely false. The HE's representations make no reference whatsoever to our Client's Site. The Council's evidence base is therefore flawed in this respect and it can only be concluded that HE is in fact satisfied that the development of the full Site would *not* harm the setting of the Conservation Area.

Notwithstanding the above, there is a need to address the Council's HIA, which we note is not included within the Council's evidence base subject of this consultation.

The HIA is in two parts, consisting of the HIA and HIA Addendum. The outcome of the HIA process, is to remove an arbitrary section of the Site, broadly parallel to the Conservation Area. We consider the process for concluding that this is the most appropriate way to address the presence of the Conservation Area, is flawed. At no point within the HIA, or HIA Addendum, does the Council consider whether an alternative approach to the Site's delivery could result in the preservation and enhancement of the Conservation Area's setting, relying on development management policies and a well-conceived design.

Vulcan Village exists because it was constructed to house the workers and families of the adjacent former Vulcan Works. It was not constructed in this location due to its rural setting, or desire for "quietness", as inferred in the HIA. If the Vulcan Works had not been constructed, neither would the Village. We also question whether it would have been a quiet existence for its past residents,

given the proximity to the heavily industrialised foundry. With the Vulcan Works now gone, a main component of the Village's historical significance and setting has been lost. Furthermore, the replacement of the Vulcan Works with a modern housing development of circa 630 dwellings, wrapped tightly around the northern perimeter of the Village, has completely altered its setting to the extent that it is now part of suburban Newton-le-Willows. To therefore seek to avoid the development of a significant portion of our Client's Site on the basis of an alleged need to retain openness around the Village, is at odds with its established setting.

Notwithstanding this, the Village has a strongly landscaped eastern boundary, meaning that if our Client's Site were to be developed, it would maintain an internal sense of isolation in the Conservation Area – aside from the northern part of the Village, which is now consumed by modern housing. It is only on 'plan' view that there could potentially be any sense of encroachment.

The enclosed Development Framework includes at Figure 9 (Page 15) an Illustrative Masterplan. The Illustrative Masterplan was prepared having regard to the setting of the Vulcan Village Conservation Area. Alongside the strong visual boundary and containment already provided by the landscape, the Illustrative Masterplan shows a further heavily planted boundary, recreational route and public open space adjacent to the Conservation Area. The HIA makes no reference to the Development Framework or Illustrative Masterplan in order to assess the potential impact of future residential development at the Site. The HIA only considers a "no development" scenario, which in our opinion is overly simplistic and lacks vision and creativity. Allowing development closer to the Conservation Area, if designed appropriately, could better reveal, complement and enhance the character and appearance of the Conservation Area; however, such a scenario has not been tested in the Council's evidence base, which is a major flaw.

Enclosed with this letter of representation is a revised Concept Masterplan (Plan Ref: BW01 Rev V3). This version of the Concept Masterplan proposes a larger area of open space between the Conservation Area and housing development, demonstrating a further option for the Site's delivery. This version of the Concept Masterplan would yield approximately 260 dwellings, based on a density of 30 dwellings per hectare. The revised Concept Masterplan demonstrates that development is achievable throughout the full extent of the 15.56 hectare Site, without harm to the setting of the Conservation Area.

In conclusion on this matter, contrary to the Council's evidence base, and the Green Belt Review, HE has no objection to the extent of the Site as identified in the Preferred Options consultation document, and as promoted by our Client in the submitted Development Framework and enclosed revised Masterplan. The HIA fails to consider a range of potential approaches to addressing the impact of future development upon the setting of the Conservation Area, and only considers a 'no-development' scenario. Such a lack of option testing in our opinion is evidence of a lack of a thorough understanding of the Conservation Area's significance. A considered masterplan for the Site's development, as presented by our Client, clearly has the potential to make a more efficient use of land in a sustainable location, whilst at the same time protecting and enhancing the character and appearance of the Conservation Area. We therefore submit that the full extent of the Site that has been promoted by our Client should be reinstated, on the basis that **the evidence base behind the Council's decision to physically curtail the Site is inadequate and the associated conclusions are not justified**.

Exclusion of Council-owned Land

The exclusion of part of the Site from the Safeguarded Land allocation, as advocated in the HIA and as proposed in Table 5.4 of the Green Belt Review, includes the southern most part of the Site that is within the ownership of the Council. The exclusion of the Council's land is partly justified by the Council on the grounds of Conservation Area impact. We set out above why we believe that reasoning is flawed. In addition to this, Table 5.4 also states that the recreational ground *'would be unlikely to be developable in any event'*. This conclusion is not justified within the Council's evidence base and there is no assessment provided as why it would not be 'developable'.

The fact that the recreational ground is within the ownership of the Council is not in itself a reason to conclude that it cannot be developed. In our Client's opinion, the recreational ground is under-

St Helens Local Plan: Preferred Options

Representations on Behalf of Jones Homes (North West) Ltd

January 2017

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BARTON WILLMORE
PLANNING / DESIGN / DELIVERY

4.6 Both Jones Homes and Persimmon Homes are currently on-site and nearing completion of their respective development phases. Both sites have experienced strong sales rates; in the case of our Client this has been between 25-30 units per annum.

4.7 As stated above, the land to the east, subject of this representation, was promoted by our Client as part of the recent "Call for Sites" on 10 March 2016.

Site Location

4.8 The Site is bounded to the west by a strip of vegetation and woodland and beyond this is the former Vulcan Works site described above. To the south is a parcel of land which whilst vacant, is used as a sports pitch and owned by St Helens Council. Beyond this is Newton Brook. To the east of the Site is the West Coast Mainline Railway line and to the north is agricultural land and public amenity land including Newton-le-Willows Cemetery.

Site Description

4.9 The Site is approximately 15.6 ha in size and comprises primarily arable agricultural land, and a Council owned sports pitch to the south of the Site.

Local Plan Allocation

4.10 The Site is currently within the designated Green Belt according to the adopted Core Strategy and UDP.

Council's Green Belt Assessment

4.11 The Council has undertaken a Green Belt Assessment of the Site (Ref: GBS_067) which concludes that the Site is "**well contained and of low significance**".

4.12 The Council has assessed the Site against the 5 purposes of the Green Belt as required by Paragraph 80 of the NPPF, and it has been concluded that it will have a "low" impact on the Green Belt if it were developed. We support this conclusion and consider, when assessed against the purposes of the Green Belt, the Site makes a weak to no contribution to the 5 purposes of the Green Belt.

- **Unrestricted Urban Sprawl** - The site is well contained, and surrounded by residential development to the west and the railway line to the east which form boundaries to the Site, which mean that the Site will not result in unrestricted urban sprawl.

- **Merging of Settlements** -The Site is located adjacent to an existing residential development, and given the boundary line of the existing development and railway line. This will ensure that there is no merging of the settlement with Winwick and Hermitage Green (located to the east of the Site). Both these settlements are located 1.7km and 1.9km respectively.
- **Safeguarding the Countryside from Encroachment** - The Site is bounded by existing housing development, vegetation and railway line. Whilst there are views beyond the railway line, these views are limited in nature and the railway line will act as a natural boundary to the Site. Whilst development of the Site will encroach into the countryside, it is limited, well-defined and falls within strong defensible boundaries preventing future encroachment. This will ensure that the countryside is safeguarded from encroachment in respect of the wider Green Belt function.
- **Setting and Character of Historic Towns** – Whilst the Vulcan Village Conservation Area is located adjacent to the western boundary of the Site, the Site itself is not located within a Conservation Area. There will be no impact in terms of maintaining the setting and character of the towns, and it is not a material consideration to fulfil this Green Belt purpose.
- **Urban Regeneration** - The Site is located adjacent to an existing brownfield development site, and would form a natural extension to the Site. There is insufficient land available within St Helens to meet the Borough's housing requirements without the release of Green Belt land. The release of the Site will not conflict with this purpose of the Green Belt and will assist in bringing forward much needed housing, including affordable housing, in the early part of the Plan period.

4.13 It is therefore concluded that having regard to the above comments and the Council's Green Belt assessment of the Site, the release of our Client's Site for housing will result in a low impact on the wider Green Belt and its purposes, and its release is justified.

4.14 We also note from the Council's assessment of sites, other sites which have been similarly considered to have a low/weak impact have been released from the Green Belt due to their limited contribution to the five purposes of the Green Belt. We trust that the additional information provided in this representation demonstrates the deliverability of the site and justifies a similar conclusion.