

St Helens Borough Local Plan – Hearing Submission

Mr Steve Muskett



Further to my original submission from 11th March 2019, I would like to add the following comments, observations and objections given the various updates and the responses from the Council to numerous PI questions.

Matter 1 – Issue 3 – Q16/17/18

Reference: Sustainability Appraisal (Addendum to the SA Report) - Updated September 2020

AECOM have prepared an update to the SA Report in response to consultation representations and this submission comment on that update.

In my original submission, I pointed out that 8HS had the greatest number of negative (red) indicators from all of the safeguarded sites, with 5 in total.

Only two other sites had greater than or equal to 5 and both were discarded. There were also 10 sites discarded with 3 or 4 red indicators.

Along with the 5 reds, 8HS also scored 6 greens, 2 ambers and 7 neutral greys.

Following the review by AECOM, they have agreed with my assessment and modified SA20 from amber to red.

They have also determined that SA8 should be altered from red to amber.

Thus meaning red and amber scoring remains as it was.

After all the input from residents, and the arguments put forward, AECOM and St Helens Council have been unable to argue any better scoring than previously.

It therefore remains, that 8HS has significantly more red, and therefore likely negative effects, than many other sites which have been discarded.

SA13 has also been updated from grey to green.

This appears to be based purely on the logic that the site is likely to deliver more than 500 dwellings.

I assume the basis of that logic is that new facilities on the site would be required due to the number of dwellings being delivered.

A new primary or secondary school on the site would therefore significantly impact the net developable area, and potentially mean cannot then deliver more than 500 dwellings.

This would then be turned into an argument from the developer, to not deliver new facilities, as that would make the site financially unviable. Especially when you consider that new GP and convenience facilities will also be required, plus all the buffers for the brook, gas and water pipelines plus the 40m buffer for the A580, where apparently no noise or pollution issues were identified.

The basis of that logic to turn 8HS from grey to green for SA13 doesn't actually stand up to scrutiny when you consider the scores of other sites.

Site 4HA for example, scores amber and yet is going to deliver almost 3000 dwellings.

Site 6HA will deliver 540 dwellings and yet remains grey.

Site 10HA will deliver 802 dwellings and remains grey.

You cannot use logic for one site and then score another site differently by ignoring that same logic.

The fact remains that 8HS should be amber or red for SA13, but at the very least has to remain grey in line with all other parcels that are logically determined that way.

The update also touches on SA12 without changing the score or confirming it to be correct.

The author of the report states they were not aware of the relocation plans of the GP surgery which is why they had scored it green due to being 529m away.

Now that they are aware of the move (to 1.75km), why has the score not been updated accordingly?

Site 4HA is marked grey as some of the site is 1.7km from a GP.

GBP_046 is grey with the GP at 1.87km.

GBP_082 is grey as GP access is 1.61km distance.

GBP_043 is also grey at 1.48km.

As are GBP_088 at 1.97 and GBP_027b at 1.07km respectively.

So again, you cannot logically reason and use a set of criteria for some parcels of land and then choose not to apply that same logic to another parcel.

Site 8HS should be grey for SA12, as numerous other parcels are for the same rationale that can be equally applied to it.

To recap, 8HS would remain with 5 reds and 2 ambers, despite the 2 modifications.

The SA Report update would suggest that the previous 6 green and 7 grey would become 7 green and 6 grey, with the modification to SA13.

There is no logical argument to change the SA13 from grey to green.

Multiple other sites, delivering over 500 dwellings, are scored grey or amber, and 8HS should remain at least grey if not turned amber.

The report has omitted to update SA12, despite now knowing that the GP surgery is not located where they thought it was.

Multiple other sites, with a GP surgery closer or similar distance as that at 8HS, are scored grey and 8HS should be changed from green to grey.

That would mean the score for 8HS should in fact be updated to 5 green and 8 grey (or even 7 grey + 1 amber).

In conclusion then, despite having reviewed the many objections and submissions from residents against the plan, the Council and their consultants have failed to counter those arguments and place 8HS in any better light than previously.

In fact, even after their secondary review, the site should actually be more negatively assessed than it was previously.

I have seen nothing from any of the Council updates that changes my view that sites have been pre-selected for allocation or safeguarding, and an attempt made to reverse engineer the data and justifications to suit the argument.