

RO0005

[REDACTED]

From: lindsay adair [REDACTED]
Sent: 07 January 2022 15:24
To: planningpolicy@sthelens.gov.uk
Subject: Bold and Clock Face Action Group

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Miss Lynsay Adair
7 Bentely Street
Clockface
St. Helens
WA9 4RP

I have read through the findings which were identified by the Bold and Clockface action group and agree to the findings.

Regards
Lynsay Adair

RO0060

From: Susan Ashton [REDACTED]
Sent: 11 January 2022 10:25
To: planningpolicy@sthelens.gov.uk
Subject: Re: St Helens Borough Local Plan Main Modifications Consultation

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

Please accept our notification of support and endorsement of objection with regard to proposed developments and future projects that include modification to green belt land within the Bold and Clockface locations.

As part of public consultation I wish to have this notification lodged and recorded as an objection to the proposed developments.

I hereby give notification and support to the report produced and submitted on behalf of the Bold & Clockface Action Group,

Regards
Mr David Ashton & Dr Susan Ashton
35 Bold Road
Sutton
St Helens
WA9 4JG

From: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>
Sent: 18 November 2021 12:44
To: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>
Subject: St Helens Borough Local Plan Main Modifications Consultation

Dear Sir/Madam,

Please find attached notification of the St Helens Borough Local Plan Main Modifications public consultation.

For further details on the consultation, please visit www.sthelens.gov.uk/localplanmodifications

Yours faithfully,

The Planning Policy Team

Development Plans Section | Development & Growth Division | Place Services Department | St.Helens Council
Postal Address: Planning Policy Team | St Helens Town Hall | Victoria Square | St Helens | WA10 1HP |
Tel: 01744 676 190
Email: planningpolicy@sthelens.gov.uk
Website: <https://www.sthelens.gov.uk/planning-building-control/planning-policy/>

RO0064

From: [REDACTED]
Sent: 11 January 2022 17:33
To: planningpolicy@sthelens.gov.uk
Subject: Submission Local Plan - Main Modifications
Attachments: PA Submission_MM_January 2022.pdf; Appendix 1.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue category

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Please find attached submission

Kind Regards

Peter Astles
81 The Parchments
Newton-Le-Willows
Merseyside, WA120DX

Q – Can we agree from a biodiversity / environment perspective we are entering very challenging times over the next decades? And Local authorities need to build policies / infrastructure and management energy and focus to meet those challenges? We face dramatically higher urbanisation, more rigorous legislation and a general public who are much more aware of the environment and nature and regulation and information has never been more freely available to the public. Local authorities need to “gear up” to align with this new landscape?

A - It is agreed that the requirements set out by Government to meet the challenges of the housing crisis and to ensure that there are sufficient employment opportunities for everyone requires that the impact on the environment is also at the heart of decision making. It is the responsibility of local authorities to meet all of these challenges, where central government sets out how these challenges are to be met in national planning policy and guidance.

Q – I am not clear who in St Helens MBC has functional responsibility for Biodiversity. Are you the accountable executive within St Helens MBC? and organisationally how does this fit within the St Helens MBC management structure?

A - There is no requirement for there to be an ‘accountable officer’ as such for biodiversity, more it is a material consideration in decision making. You will be aware that the National Planning Policy Framework sets out the planning requirements for conserving and enhancing the natural environment and how plan-making and decisions are to deal with the issue. In terms of the management structure, the Head of Planning and Assistant Director for Planning & Regeneration have responsibility to ensure that planning decisions and the new local plan deal with all issues, including biodiversity, in an appropriate manner.

3 – In your response you have avoided large parts of my letter on the basis of the 2020 / 35 local plan is under examination by the secretary of state. My understanding of the local plan is that hearings have been held and the inspector is not inviting further comment from the public. Moreover, my points are not relevant to the local plan; they are about St Helens MBC management process, focus and delivery on biodiversity. Therefore I am unclear why these points cannot be responded to? If there is a legal reason could you state it?

A - The Council has had to formulate the local plan to meet all the requirements and challenges set out by government. The Framework is explicit that the purpose of planning is to deliver sustainable development, which means balancing economic, social and environmental objectives. There has to be a focus on all aspects of sustainable development in decision making and in the new local plan. This is one of the factors that the inspectors have looked at through the examination. The council's position is set out and you have had the opportunity to set out your views. The inspectors will now decide whether the proposals meet the challenge.

Q – St Helens MBC recently has been making a great deal of local publicity in its efforts to address climate change. St Helens MBC has declared this as an emergency; therefore one would assume the council is putting resources into this? I

am not clear how this aligns with the council's biodiversity policy? It is "self evident" countryside and natural mitigation are prime drivers in addressing greenhouse gases and absorbing pollutants. Climate change and biodiversity are symbiotic but they seem to be separated in St Helens MBC, almost independent organisationally?

A - Climate change is a term that generally refers to changes in temperature and weather patterns and encompasses a series of responses. including to biodiversity. You will be familiar with chapter 14 of the Framework which sets out how local plans and decisions should respond to the challenges. In St Helens, policy LPA02 of the Local Plan Submission Draft (LPSD) sets out the spatial strategy for the Borough and includes a requirement to mitigate the impacts of climate change, including biodiversity. Policy LPC08 specifically sets out proposals to ensure greater resilience and to secure net gain in biodiversity, in conjunction with the draft supplementary planning document on biodiversity submitted with the LPSD dated October 2020). The proposals for ecological networks, by definition, will assist in making biodiversity and the environment more resilient to climate change.

Q – In your response you infer we all have responsibility for biodiversity in the St Helens together ethos? Whereas I fully agree we all bear a collective responsibility, surely the local authority by its policies and actions is the prime enabler to making things happen? If the local authority is not setting the process and infrastructure no amount of effort by the general public / voluntary organisations will have an impact.

A - Please see above.

Q – In terms of MEAS I agree with your comment MEAS / STMBC have a strong engagement complimentary to your role. My point though, was that this is not a substitute for a strategy driven by the council relating to St Helens borough. MEAS are a strategic advisory body to the Liverpool City Region as a whole; their input cannot be St Helens MBC strategy. You mention Biodiversity Supplementary Planning Document back in 2011 and I am also fully aware of the provisions of LPC06 in the 2020 / 35 plans and that the council have rejected modifications to this in the plan process. In many ways I don't care what is in a written policy; it's the delivery that ultimately matters. Policies are merely broad procedural guidance what matters is the outcome over the plan period. This is my core and overarching point that has motivated me to write in.

A - To clarify, Merseyside Environmental Advisory Service (MEAS) is an organisation that is funded by and provides advice across the local authorities in the Liverpool City Region. In that sense, it is essentially part of the council giving expert advice on matters of biodiversity amongst other things. It is not part of the Combined Authority. Whilst on occasion it has a strategic role, that is not it's purpose. You are aware that MEAS has been closely involved in the formulation of the LPSD and have given specific, expert advice, as well as being consulted on a regular basis on specific development proposals. In terms of policy LPC06, this is before the inspectors at present, where all comments will be taken into account.

Q - In my original letter I cast doubt over the performance of St Helens MBC in relation to biodiversity both historically and present day. You disagreed with my assertions. However the ineluctable status (as outlined in my original letter) is that there are no significant managed nature's reserves in St Helens borough whereas Wigan and Warrington have several. In the new environment we face this matter greatly because it means St Helens not only has substantively less biodiversity assets but critically has less capability for future mitigation and BNG. To be clear here I am referring to nature site assets that are overtly managed with habitat and species action plans not wild areas that have biodiversity as a natural event. Adjacent local authorities also have a close relationship with wildlife trusts and private conservation groups.

A - There are no managed nature reserves in the Borough, but this does not mean that St Helens has substantially less biodiversity. There is no evidence for the assertions being made here.

Q – In terms of the St Helens MBC planning and tick box approach. As I outlined in my original letter I have nothing but respect for the planning officers. But they can only work with what they have. If the boroughs engagement is narrow (effectively only MEAS) and the borough does not have active managed biodiversity infrastructure by definition their conclusions will be limited. We also must address the issue of expertise. In the national press local authorities have been questioned over expertise. Some local authorities employ in house ecologists or other expertise; those that don't are often reliant on the developer's ecologists and have a very narrow independent perspective. Biodiversity is increasing in complexities with the more robust legislation and pressures on the natural assets. I am unclear how St Helens MBC is positioned in that the planning function has access to adequate tactical biodiversity knowledge other than MEAS. MEAS may have generalised knowledge but they may or may not have tactical knowledge of the area or site. St Helens planning are therefore heavily reliant on the individual developer's ecology studies.

A - To confirm the comments above, MEAS are experts and ecologists and are funded and are effectively part of the Council. They do not have 'generalised knowledge' but are appropriately qualified experts. To say that planners in St Helens have simply relied on the conclusions stated in developers report is not true. The ecologists at MEAS have commented in a similar capacity to any in house ecologist at another authority. It just happens that in the Liverpool City Region it is a shared resource.

Q – There is substantial resistance to St Helens emerging strategy of the engagement with Mersey forest as core mitigation for future developers. Mersey Forests aims may or may not align with the need in St Helens borough. I have no issues with delivery via Mersey forest (they have wide ecology enterprise beyond trees) however simply giving a general donation is a gift to developers and vehicle to avoid biodiversity net gain. I am aware the council responded to this in the 2021 local plan stating the initiative was wider than tree planting recognising broad leafed woodland does not cover the spectrum of biodiversity, valuable though it is. However if St Helens MBC are serious about this it requires a stronger biodiversity strategy, than exists now, to deliver the necessary complexity of approach.

A - St Helens Council is a long standing partner of the Mersey Forest, which means that we are fully engaged in their policies and programmes, including in the adopted and proposed development plans for the Borough. You will be aware that for proposed policies LPA09 Green Infrastructure; LPC06 Biodiversity and Geological Conservation; and LPC10 Trees and Woodlands engagement with the Mersey Forest is identified as a key delivery mechanism. You refer to the fact that the Mersey Forest has engaged with the inquiries where, if granted, they will effectively deliver the requirements for biodiversity as a result. Whether the actions of developers and the Council are appropriate is before inspectors at the present time, and we await the outcome.

Q – In terms of development control you state the council actively pursues enforcement action where developers fail to meet obligations in planning. However there does seem to be an issue with Florida Farm development? But I have no knowledge borough wide and I accept your assertions. However, as with the points above, all this is heavily reliant on the biodiversity capability and expertise of the local authority in order to monitor this effectively. If this is not in place its highly likely this will fail, which it seems to be doing, in some cases.

A - In terms of enforcement action, I can confirm that there is an open enforcement case in respect of breaches in planning control, including provision of landscaping. It is an on-going investigation, where the council is in contact with the developer to resolve the outstanding issues.

Q – Generally your response asserts St Helens MBC “To ‘create green and vibrant places that reflect our heritage and culture’ and recognise that together we can ensure ‘our environment is protected for future’.” In your response I was expecting a battery of initiatives that St Helens MBC is undertaking with examples. Yet this statement above is merely a mission statement. This cannot give the public confidence that there is energy and active planning and making real things happen in the borough.

A - The Council is committed to meeting the challenge of sustainable development including providing for biodiversity and meeting the challenge climate change, including the requirements of the Environment Bill. Our policies and plans take account of the needs of all including the preservation and promotion of biodiversity, when pressure to develop and provide homes and jobs is also high.

Peter Astles ACMA, ACIS – [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From being a toddler, I have always been fascinated by nature and the natural world. I am a very keen wildlife photographer and ornithologist in the local area and nationally. [REDACTED] to a number of groups in this field in the local area.

[REDACTED]
[REDACTED] But I am greatly concerned locally with the very intensive and uncontrolled loss of habitats. I am also not satisfied with the approach to biodiversity in the St Helens local authority, in particular the direction of its biodiversity mitigation strategy.

I believe I have a good working knowledge of the species and habitats in the St Helens, Wigan and Warrington boroughs and the wider North West gained over several decades.

I participated in the 2012 St Helens MBC Core Strategy hearings and 2021 Local Plan hearings. Parkside and Haydock Point public inquiries.

My comments below refer to Biodiversity aspects of the Proposed Local Plan.

General Matters Biodiversity

I have very significant concerns over the overall direction of the local plan in relation to Biodiversity. Principally the entire focus on nature improvement areas, which in reality are chosen for planning and recreational purposes not habitat related. In addition the strategy of sapling planting as compensation for mature habitats lost. The nature improvements areas reserved in the plan already have high human pressure and disturbance. This is likely to increase with population increase and the overt policy of shielding the statutory protected sites by increasing human disturbance on the boroughs wildlife, a clear MEAS policy stated in the hearings and referenced in the main modifications.

The outcome of this is likely to be a significant reduction in St Helens borough biodiversity due to large scale loss of habitats with remaining wildlife areas limited to restricted habitats with large scale human disturbance.

I also have concerns the local authority does not have sufficient resources and management focus to meet the challenges of the next 15 years. Climate change, increasing development, increased population, global and national biodiversity crisis requires a “step change” approach to meet the future St Helens environment as it will be, not what it has been historically.

See Appendix 1 where I have engaged with St Helens MBC on these issues. Whereas I thank the local authority for their efforts in responding I do worry all we appear to have are policies that are designed to frame planning applications being the driver for the entire future St Helens biodiversity landscape, without any internal management process / measurement or accountability within the local authority.

The Environment bill requires local authorities to take direct steps to mitigate the loss of wildlife and take steps to increase biodiversity.

For the reasons I have given I do not believe the local authority will meet these challenges and the current local plan has substantial gaps in future Biodiversity provision.

Specific Points relating to modification schedule.

MMM03 – As well as inclusion of climate change add inclusion Biodiversity Impact of Environment Bill or, at least, refer Environment Bill

MM014 - n such cases, mitigation, for example, in the form of incorporating the identified Green Infrastructure assets into the scheme design and layout through a masterplanning process to maintain the key Green Infrastructure assets and connections, and / or as a last resort APPROPRIATE compensatory provision will be required.” . . .

Inclusion of appropriate here. This is important as we are seeing generalized mitigation as compensation for specific losses. For example where wetland assets are lost we would expect to see relevant compensation or at least attempt it. Otherwise we are simply planning for cash donations that may or may not contribute to biodiversity objectives.

“4.33.1 Policy LPA09 aims to protect, enhance and sustain the Borough’s natural assets and increase accessibility to them and connectivity between them, whilst protecting and enhancing landscape character, to ensure that the natural environment underpins the quality of life. The Green Infrastructure network in the Borough has a wide range of functions and values for recreation and tourism, air quality (supporting the Council’s Climate Change Emergency declaration), public access, health, heritage, biodiversity, water management and landscape character; providing a sense of place ...”

Suggest for clarity add biodiversity development. This is because the environment bill aims for a step change in delivery. It is not protect wildlife but positively enhance it, in line with the governments strategy. That needs to be recognised as you have done with Climate emergency.

MM026

101 LPC06

Evidence requirements

5. 6. Development proposals that would affect a designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and / or compensation proposals, and of any proposed management measures.

Inclusion of “measurable” here BNG target by definition has to be measurable in some way, otherwise its impossible to implement.

7.6.2 Policy LPC06 sets out how sites, habitats and species within this the hierarchy of sites, habitats and species will be protected and managed with the objective of ensuring that there will be no net loss of the ecological resource. The policy will also guide how appropriate mitigation, replacement or other compensation measures should be identified.”

Measure should also be included in this section.

MM035

7. consider the Borough's environmental assets (including, but not limited to, biodiversity and associated habitats, landscapes, trees, woodland and hedgerows) in accordance with policies LPC06, LPC08, LPC09 and LPC10

Add mature grassland, wetland and scrub.

HABITATS REGULATION ASSESSMENT

The study needs to include the recognition of the following

The statutory protected sites are not isolated ecologically. They have a natural and sustaining symbiotic relationship with the wider ecological network. Pink Footed Geese and other wildfowl and waders feed inland on moss land and agricultural areas, birds of prey owls, and falcons (Short Eared Owl, Barn Owl, Peregrine, Hobby, Merlin and others, buntings, finches and other species.

This is self-evident and a natural ecological fact, St Helens (due to its location) has a pivotal role. I am greatly concerned the local plan has little recognition of this or draws this connection.

If we add to this the initiative to encourage recreational use of nature improvement areas in St Helens to relieve pressure on the statutory sites with inevitable impacts on biodiversity in St Helens due to human disturbance.

Then we are creating a situation where the enabling feeding and migratory areas supporting the statutory sites are severely reduced in capacity.

BIODIVERSITY NET GAIN MEASUREMENT

In the local plan hearings I raised the issue of measurement of biodiversity net gain (BNG) in the local plan. In 15 years time how will we know we have achieved the local plan and national objectives if there is no measurement process. BNG is described by Natural England as an approach to development

or land management that leaves nature in a measurably better state than beforehand.

I recall this issue was recognised and an action in the hearings, my recollection was it was included as an update to the plan but the local authority were awaiting further guidance from central government.

I do not see this action in the main modifications has it been lost from the update or rejected? This has to be included otherwise the policies are meaningless text, that are unlikely to comply with UK Government guidance.

RO0078

[REDACTED]

From: Jeanette Bailey [REDACTED]
Sent: 11 January 2022 12:56
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Please accept this email as evidence that I support the comments made by RAFFD and GRAG.

Jeanette Bailey
13, Peebles Close
Garswood
Wigan
WN4 0SP

Sent from my iPad

RO0115

From: [REDACTED]
Sent: 10 January 2022 09:41
To: planningpolicy@sthelens.gov.uk
Subject: The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted, this is the list of values it contained. You can turn this email off under workflows in Umbraco Forms.

Title

Mr

Other title

First Name

Clive

Last Name

Barton

Organisation/company

Address

19 Brooklands Road

Ecclestone

Postcode

WA10 5HE

Telephone Number

Mobile Number

Email Address

[REDACTED]

Do you have an agent?

No

Agent's Title

Other title for Agent

Agent's First Name

Agent's Last Name

Agent's organisation/company

Agent's Address

Agent's Postcode

Agent's Telephone Number

Agent's Mobile Number

Agent's Email Address

3. Would you like to be kept updated on future stages of the St Helens Borough Local Plan 2020-2035? (Namely publication of the Inspectors' recommendations and adoption of the Plan.)

Yes

4. Which Main Modification does this representation relate to?

MM011

5a. Do you consider that this proposed Main Modification is legally compliant?

No

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

No

6. Please provide a reason for your response to questions 5a and 5b

LPA06, to which Main Modification 11 refers, includes a housing target of 486 per annum over 15 years. This is also carried forward to justify safeguarding Green Belt for another 15 years (2037 - 2052). It has been shown that this housing target is not sound for many valid reasons. St Helens Council have added a further reason this week. On Wednesday 12th January 2022 (the day before this consultation closes) the Council are being asked to approve a new Draft Housing Strategy. This strategy acknowledges that the household growth in St Helens is less than the North West generally and equates to 407 households per year. The Local Plan cannot be considered sound when Council Policies directly contradict each other, using different housing targets. The Local Plan should use the lower of these housing targets for the 15 years of the plan and remove all safeguarded land to protect the Green Belt as it is clear that forecasting housing need between 2037 and 2052 is not a sensible approach when growth is unpredictable.

7. Do you wish to make a representation on another Main Modification?

No

8. Which Main Modification does this representation relate to?

9a. Do you consider that this proposed Main Modification is legally compliant?

9b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

10. Please provide a reason for your response to questions 9a and 9b

11. Do you wish to make a representation on another Main Modification?

12. Which Main Modification does this representation relate to?

13a. Do you consider that this proposed Main Modification is legally compliant?

13b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

14. Please provide a reason for your response to questions 13a and 13b

15. Do you wish to make a representation on another Main Modification?

16. Which Main Modification does this representation relate to?

17a. Do you consider that this proposed Main Modification is legally compliant?

17b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

18. Please provide a reason for your response to questions 17a and 17b

19. Do you wish to make a representation on another Main Modification?

20. Which Main Modification does this representation relate to?

21a. Do you consider that this proposed Main Modification is legally compliant?

21b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

22. Please provide a reason for your response to questions 21a and 21b

23. Do you wish to make a representation on another Main Modification?

24. Which Main Modification does this representation relate to?

25a. Do you consider that this proposed Main Modification is legally compliant?

25b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

26. Please provide a reason for your response to questions 25a and 25b

27. Do you wish to make a representation on another Main Modification?

28. Which Main Modification does this representation relate to?

29a. Do you consider that this proposed Main Modification is legally compliant?

29b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

30. Please provide a reason for your response to questions 29a and 29b

31. Do you wish to make a representation on another Main Modification?

32. Which Main Modification does this representation relate to?

33a. Do you consider that this proposed Main Modification is legally compliant?

33b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

34. Please provide a reason for your response to questions 33a and 33b

35. Do you wish to make a representation on another Main Modification?

36. Which Main Modification does this representation relate to?

37a. Do you consider that this proposed Main Modification is legally compliant?

37b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

38. Please provide a reason for your response to questions 37a and 37b

39. Do you wish to make a representation on another Main Modification?

40. Which Main Modification does this representation relate to?

41a. Do you consider that this proposed Main Modification is legally compliant?

41b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

42. Please provide a reason for your response to questions 41a and 41b

RO0117

[REDACTED]

From: Su Barton [REDACTED]
Sent: 07 January 2022 13:29
To: planningpolicy@sthelens.gov.uk
Cc: [REDACTED]
Subject: ECRA, with Windle, response to Main Modifications to the Local Plan
Attachments: ECRA MM Submission_Jan22.docx

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached a response to the Main Modifications of the St Helens Local Plan Submission Draft for the attention of the Inspectors.

This is submitted on behalf of the Eccleston Community Resident Association (ECRA, with Windle.)

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

c/o 19 Brooklands Road

WA10 5HE



**Response to
ST HELENS LOCAL PLAN
Main Modifications
January 2022**

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

ECRA (Eccleston Community Residents Association) was formed in 2016, primarily to oppose proposals to build on Green Belt sites included in the St. Helens Local Plan Preferred Options (2016). Residents from Windle supported this organisation and the two parishes joined together to campaign against overdevelopment in the Eccleston and Windle area. ECRA with Windle, (hereinafter to be referred to as ECRA) has responded to a groundswell of local opinion in favour of retaining Eccleston and Windle site 8HS as Green Belt - we trust our submission reflects the views of our community.

Our response to the Submission draft (May2019) remains a significant comment on the Local Plan process (May 2019) and we remain convinced by our argument stated therein.

ECRA believes the plan is not sound and needs to be modified, specifically that the parcel of Green Belt 8HS in Eccleston and Windle should NOT be removed for development in the next 15 years nor safeguarded for longer term development.

Report from Kirkwells - SHGBA Response to Main Modifications

This report, by ECRA (January 2022) fully endorses and complements the SHGBA submission by Kirkwells Planning (January 2022).

In our initial report, ECRA demonstrated and maintain that:

1. there are no exceptional circumstances to justify not using the standard method.
2. the economic analysis is flawed and based on over-optimistic assumptions.
3. the area of land needed for development is not as great as set out in the Local Plan.
4. there are, therefore, no exceptional circumstances to change Green Belt boundaries.
5. other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.
6. the policy and process for progressing the identification and remediation of contaminated land in preparation for entry onto the Brownfield Register is not robust.
7. these alternatives will have less impact on the environment and result in a reduced need for new infrastructure.
8. the Green Belt Reviews are inconsistent and biased.
9. the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

ECRA have further developed the evidence concerning points 5, 6 and 7. These pertain directly to Main Modification 11 and are detailed below.

St Helens Council should amend the plan - retaining Green Belt and allocating more previously-developed land.

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

4.6.11 As previously identified, all the neighbouring Authorities have, or are planning to, build more housing units than the ONS (2014, 2016, 2018) has stated are needed. This will result in an oversupply in the North West and, as a consequence, will remove Green Belt unnecessarily.

4.6.12 There is an assumption that the new housing is to accommodate current residents when this is not the case. The current population of St Helens is housed, and the average household size is 2.1 which is less than the national average of 2.3. It is unclear how the new Local Plan can guarantee delivery of affordable or special needs housing for residents as there is no evidence that affordable housing targets have been met in over 10 years, as identified in the current Local Plan and Plan reviews.

4.6.25 The Council state that “Open spaces and landscaping, including those provided within development sites also provide opportunities to adapt to climate change by storing flood water, reducing urban heat islands, capturing carbon and improving air quality, and therefore support the Council’s Climate Change Emergency declaration.”

Building on Green Belt is contrary to these aspirations – particularly on 8HS, which is mainly Grade 1 and 2 agricultural land, contains a flood zone, and protects residents from the air pollution caused by the proximity of the A580.

4.6.29 ECRA welcomes the partnership with the English Cities Fund and the emphasis on regeneration. It would be wise to await the outcomes of this before safeguarding Green Belt land for development in 15 years’ time.

MM007 - 008 No comment

MM09 We fully support this response made by Kirkwells on behalf of the SHGBA, which contests the findings of the Green Belt review for 8HS:

“SHBC’s exceptional circumstances argument is flawed. By acknowledging that this is a “significant greenfield site” and that the site “forms a sizeable outward extension of the urban area into the countryside” – SHBC’s “exceptional circumstances” case demonstrates that the site serves 3 of the 5 purposes of Green Belt:

- a) it checks the unrestricted sprawl of a large built-up area;
 - c) it assists in safeguarding the countryside from encroachment;
- and
- e) it assists in urban regeneration, by encouraging the recycling of derelict and other urban land.

The MM wording demonstrates that the site makes a high, rather than low, overall contribution to the purposes of Green Belt.”

MM010 No comment

MM011

1. If the housing supply falls below the numbers needed, the Council will “Seek funding to unlock brownfield sites to boost housing supply.” We do not believe that the Council should wait for sporadic triggers to put this policy into action. They could be more proactive and optimize the funding opportunities which result from being a Liverpool City Region (LCR) member. In October 2021, Michael Gove spoke out on the Government’s behalf, saying: “Making the most of previously developed land is a government priority” and this was backed by the release of a £75m Brownfield Release Fund on October 12th, 2021. The latest list of monies allocated was released on November 30th, 2021, and this does not include St Helens.

Due to our industrial heritage, we have a high proportion of potentially contaminated land which is currently regarded as unfit for development. The Council policy on this appears not to be implemented. ECRA have been pressing for answers from Council officers and Councillors about the Contaminated Land Inspection Strategy because the processes which should sit coherently alongside this strategy are sadly ineffectual (Appendix 2) This means that over 6000 sites await inspection, and we await an explanation as to why this has been so since 2017.

ECRA had previously identified these issues and opportunities in its report on the Local Plan, May 2019. (Appendix 1)

2. St Helens Council have commissioned a Habitat Regulation Assessment as one of their submission documents for the Local Plan. The latest version (October 2021) makes clear that 8HS is a site of importance for wildlife. It highlights that development on 8HS is likely to have significant effects due to the possibility that it contains land suitable for non-breeding birds. The consequences of this recognition resulted in the Council updating its Policy LPC06 Biodiversity and Geological Conservation, to put stricter requirements in place.

These require future development proposals to adequately assess and mitigate for the loss of functionally linked habitat. To prove this, a survey will be required to determine the current use of the site including a non-breeding bird survey to determine if the site and neighbouring land constitute a significant area of supporting habitat. If it is identified that habitat within the site or adjacent land supports significant populations of designated bird features, avoidance measures and mitigation will be required. Any planning application would be likely to require a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.

Eccleston and Windle residents have been reporting sightings of wildlife to the Merseyside Biobank project, so we are well aware that 8HS is an important site for non-breeding birds. Recently a significant number of pink footed geese were photographed on 8HS. ECRA believe that this fact should have been considered in both the Green Belt Review and the Local Plan review. The only certain mitigation is to leave the site in the Green Belt.

It is obvious that an Environmental Impact Assessment (EIA) would be required before any detailed planning can be undertaken on 8HS. The St Helens Council “Nature Conservation SPD (Supplementary Planning Document) is still in draft form (October 2020) and we believe this is a key document that should be addressed before the Local Plan can be approved. An EIA must also consider any biodiversity issues which extend beyond the boundary of the development site and the neighbouring Catchdale Moss is recognised as an important area for farmland birds such as yellowhammer, corn bunting and tree sparrow.

Documents - [sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf](https://www.sthelens.gov.uk/media/10000/sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf) (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

6. Direct access from new development on to the Strategic Road Network will only be permitted **as a last resort**, where agreed by Highways England **and where the necessary levels of transport accessibility and safety could not be more suitably provided by other means.**

The outline proposal for 8HS includes a new roundabout on the A580 from Houghton's Lane, which directly contravenes this statement. If this had been considered during the Green Belt Review, 8HS would not be allowed to progress.

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

- 7. Further details concerning the implementation of this policy will be set out in the Council's proposed Nature Conservation Supplementary Planning Document."**

The Nature Conservation Supplementary Planning document is in draft form (October 2020) and contains Climate and Ecological issues of vital importance to the validity of the plan.

MM027 - 046 No comment

ECRA suggest that the plan needs to be modified, specifically that the parcel of Green Belt, 8HS in Eccleston and Windle, should NOT be removed for development in the next 15 years or safeguarded for longer term development.

Appendix 1

The following is from the ECRA Response to the Local Plan Submission Draft (May 2019)

Contaminated, Previously Developed and 'Brownfield' Land

ECRA calls upon the council to rigorously adopt policies to bring forward contaminated, previously-developed or 'brownfield' land, in the plan period, to ensure that both Sections 8 c) and 11 of the NPPF (February 2019) are satisfied (Appendix 1). There is a concern that the Brownfield First policy commitment of the council is weakened significantly by the addition of the wording: "as far as practicable."

ECRA calls upon the council to be proactive in the implementation of its documented strategies and joint working arrangements, as detailed in the SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS). This strategy (CLIS) highlights the fact that "contamination in St Helens is widespread, due to the area's industrial heritage and the nature of its past industries" (p.35 Contaminated Land Inspection Strategy Revised January 2017 CLIS). Furthermore, it is noted that "Tackling the historic legacy of contaminated land through the regeneration process is a sub-regional priority. Its importance is being flagged up through joint working arrangements at the sub-regional level including:

- Liverpool City Region Combined Authority and its future delivery of a Spatial Framework covering the City Region;
- The Local Enterprise Partnership (LEP);
- City Region Growth Strategy (LEP);
- EU Investment Plan 2014-2020 (LCR EU Structural and Investment Funds Strategy 2014-2020);
- Local Nature Partnership". (p.11 & p. 12 CLIS)

Two key strategic aims within this strategy suggest that STHMBC has an appetite to protect valuable Green Belt whilst acting to remediate sites which are currently deemed unsuitable for re-development:

- "to assist regeneration, improvement of the environment and protection of the Green Belt through effective links with wider Council and regional policies;
- to encourage, where appropriate having due regard to ecological importance, the reuse and remediation of brownfield land through the planning regime in accordance with the National Planning Policy Framework (NPPF) to ensure that new developments are suitable for use." (p.36 CLIS)

However, there is a distinct lack of cohesion between these documented intentions and the Council's own evidenced activity, particularly when viewed in the context of the SHLPSD. The Contaminated Land Inspection Strategy states that "speed and progress during implementation of this strategy continues to be dependent on the resources available".

A rolling programme of detailed inspections commenced in 2009 and is reviewed annually. Notably the progress has been reactive rather than proactive; during the last 10 years the programme has been entirely as stated in the strategy, i.e. "Much of the action taken to deal with land contamination has been development-led, through the planning and development management process." (p.33 CLIS).

SHMBC published a statement of Contaminated Land (CL) sites, 2015, shown as Table 35 (Appendix 1) – Brownfield and Contaminated Land. The table illustrates that 3,170 ha of the lowest priority contaminated land exists in St Helens, whilst the SHLPSD states that 148 ha of Green Belt are in

jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need. **This area equates to less than 7% of the 3,170 ha CL. Hence the need for reclassification of Green Belt to Safeguarded land could be totally eliminated if the process outlined in the Strategy (CLIS) was rigorously adopted.**

It is not surprising therefore that the slow rate of progress is of great concern to ECRA and it is entirely wrong to risk the loss of Green Belt rather than implement a robust policy and efficient process for remediation.

SHMBC suggest that funding poses a barrier and the CLIS states:

“Local authorities are required to investigate potentially contaminated sites in accordance with the Statutory Guidance and, where necessary, at their own expense. Where sufficient evidence is obtained to conclude that sites are Contaminated Land, the” polluter pays” principle will apply, ... Where no responsible person(s) can be found, the local authority may be required to undertake this work at their own expense.”
(p.49 CLIS)

Presumably with this in mind, Leader of the Council (SHMBC), Cllr Derek Long on national TV (June 2018), stated that two-thirds of St Helens was made up of contaminated land and that it would cost £40m to remediate. ECRA question why would the Council leave two-thirds of the borough to languish and blame a lack of central government funding when there is a regional funding under-spend?

St Helens is part of the Liverpool City Region. Liverpool City Region (LCR) hold a Strategic Investment Fund (SIF) which, in February 2019, was reported, by the Liverpool Echo, to be £80m underspent. The newspaper quoted Mark Bousfield, Director of Commercial Development and Investment for the LCR as follows: “The £80m that was not spent during the first phase is still available and has been rolled into our new £500m Strategic Investment Fund.”

“The SIF will support projects that:

- “Unlock unviable housing sites in order to accelerate housing delivery in the City Region;
- ...are located in areas of strategic significance and deliver neighbourhood regeneration;
- include development of housing on Brownfield sites...”

ECRA question why would St Helens Council fail to apply, via the Combined Authority SIF, for redefinition monies? SHMBC and St Helens Chamber are eligible to bid into the SIF – why don't they collaborate; optimise their development team capacity and make viable bids to this fund?

This shows that vital funds, from the SIF, are within the Council's reach and could be used commensurate with the LCR's Sustainable Urban Development Strategy.

ECRA was pleased to hear the announcement, in February 2019, that SHMBC is taking part in a national pilot to look at innovative ways to bring small brownfield sites back into use. This is a study supported and funded by the Local Government Association, together with the consultancy firm – Local Partnerships. Cllr Derek Long (Leader of the Council) suggests “a renewed focus on a brownfield-first policy (where possible)”. If this offers a vehicle to identify new models for bringing brownfield sites forward, then it is obviously welcomed. ECRA equally trusts that findings/outcomes of this pilot will mitigate the moves to safeguard land.

ECRA would support all viable means by which St Helens Council could identify and process more Brownfield and Contaminated land to make it available for development within the period of the plan.

ECRA's evidence shows that there can be a meaningful and sustainable change in policy to recover contaminated land during the next 15 years, and hence there is no requirement for any Safeguarding for development beyond the plan period, and no exceptional circumstances for removing land from the Green Belt.

ECRA is concerned that:

1. The SHLPSD ignores any provision in meeting the housing need from Unsuitable sites. These sites have been excluded on the basis that it is not possible to bring them forward for development during or beyond the period of the proposed SHLPSD.
2. Policy LPA06 of the SHLPSD sets out the council's view that Safeguarding is needed to ensure the long-term development needs for housing beyond 2035. However, ECRA understands that the acknowledgement within the SHLPSD that housing needs will be lower after 2035 effectively means that 2955 dwellings from Allocated sites (even using 468 units) would provide over 6 years supply.
3. Designating high quality agricultural land now, as development land for the period beyond 2035 (by which time circumstances and needs will have changed), does not accord with the principles of sustainability and is not an efficient custodianship of precious land resources.
4. Whilst remediation may be an expensive and complex process, the type, extent and cost of remediation of contamination will vary. Safeguarding land for future development will act as a disincentive for landowners to work in conjunction with developers to remediate and develop contaminated land. (Further exploration of this point can be found within Appendix 2)

ECRA ultimately demonstrate that these factors, combined with a high level of community concern, with regard to non-compliance with NPPF, regional strategies and SHMBC's own policies indicates that the safeguarding provisions in the SHLPSD are absolutely unnecessary and as such should be withdrawn completely.

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton [REDACTED]

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

as the Consultation on the Local Plan opens on Thursday, we were wondering if there is any further detail regarding our questions on Contaminated Land? The availability of new government funding could have a significant impact on available building land, both before and after 2037? As this is new money, it makes sense to take it into consideration as the Local Plan may be adopted in 2022 and this money could ensure that safeguarded land will not be required after 2037.

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

----- Original Message -----

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

Thank you for your response, ECRA, with Windle, appreciate all the council are doing to build on Brownfield sites, where it is possible to do so. We are aware, however, that there are opportunities for further use of Brownfield and Contaminated Land and have some questions about this. This has been highlighted by both the government, in their recent budget announcements, and the Labour party's emphasis on the continuing need for agricultural land as a food provider(supported by Conor McGinn, Sept 2021). The government has announced that it will make new money available for the remediation of contaminated land and we hope that St Helens Council will be looking very carefully at applying for this new money.

The Contaminated Land Strategy was last revised in 2017. In Table 1, the number of potentially contaminated sites is 9,105 with a suggested inspection rate of 200 sites per year. This is partly in response to Part 2A of the Environmental Protection Act 1990 which was introduced in England and Scotland in 2000 placing duties on local authorities to identify potentially contaminated sites in their area and ensure that they are cleaned up appropriately. I have tried to find a Contaminated Land Register detailing sites that are deemed to be contaminated, sites that have been inspected along with their outcome, and sites still to be inspected, but none appears to exist online.

Could you confirm that a Contaminated Land Register is available and is updated as detailed in the Council Contaminated Land Strategy?

How many sites have been inspected since 2017?

How many sites are due to be inspected in 2021/22?

Is there a priority list of sites to be inspected?

Presumably more potentially contaminated sites will be identified and added to this list – is there a process for this?

The Executive Summary of the same report suggests that only 6 sites had been investigated between 2006 and the publication date of 2017. How does this tally with the proposed 200 sites per year? Is this programme still Council policy?

Of course, not all contaminated sites will prove to be a problem, indeed, many contaminated sites have been successfully and safely redeveloped to provide high quality housing and working environments. The UK Government now wants to bring as much Brownfield land as possible back into use. By encouraging the regeneration of previously developed land this limits unnecessary development of Greenfield sites, helps preserve the countryside and protects against urban "sprawl". In order to implement their strategy, they have made funds available to assist councils to remediate areas of contaminated land within their borough. It would appear sensible to use available funds to move suitable contaminated sites into the Brownfield Category and, considering St. Helens' industrial past, it seems inconceivable that some of this money would not be made available to the council should they apply.

Can you please confirm that the council intend to apply for the new funds available from the Government?

If the application is successful and suitable sites become available as part of the inspection process, then maybe this Contaminated/Brownfield land could be safeguarded for after 2035 removing the need to safeguard Greenbelt and particularly sites such as 8HS which is predominantly grade 1 agricultural land and an ideal example of the type of land the Government and the Labour party is trying to protect.

regards,

Su Barton

Communication Lead for ECRA, with Windle

On 19 October 2021 at 12:10 Sean Traynor [REDACTED] wrote:

Good afternoon Su and thanks for your email of 10 October. I hope that this response on behalf of the Leader of the Council is of assistance.

As you note, through our partnership with the English Cities Fund, the Council has been considering the regeneration opportunities for the town centres of St Helens and Earlestown. In doing so, Draft Masterplan Development Frameworks have been prepared for each centre, setting out a vision, objectives and proposals for each. The Strategic Objectives for both draft masterplans include 'promoting high-quality town centre living' and 'creating a sustainable, accessible and connected town centre'. More information (and links to the documents) can be found here - <https://www.sthelens.gov.uk/news/2021/october/12/ambitious-plans-set-for-regeneration-of-st-helens-and-earlestown-town-centres/>. Subject to the agreement of the Cabinet, these documents will be consulted on for 6 weeks from the 1 November, and we would welcome your views via the available feedback channels.

With regards to the use of brownfield land, you will be aware of the Council's enviable record in supporting the development of high-quality family housing on previously developed sites where this is possible. Recent examples include Moss Nook, where the Council has helped secure significant financial support from the Liverpool City Region to make the site viable, and the former Cowley Hill Works site that will deliver over 1,000 new homes, plus there are many others that I could reference.

In terms of the Local Plan, the Council is currently in the process of finalising the Main Modifications to the Plan. They have been requested by the Planning Inspectors as changes necessary to make the Local Plan "sound", as required by national policy, based on all the evidence submitted to the Examination to date, both written and verbal. The proposed Main Modifications will be presented to a future Cabinet meeting, and subject to Cabinet approval, a public consultation on them will be undertaken. You will therefore have the opportunity to comment further, and this will be taken account of by the Inspectors in their further considerations as part of the Local Plan process.

As you may be aware, during the public hearing sessions earlier this year, the Inspectors chaired a detailed discussion on the Council's stated housing land supply supporting the Plan. This considered the inclusion of individual sites in the supply in rigorous detail, as well as whether there were further sites that should be added to the supply. Based on all the evidence presented, it has simply not been the case that the Inspectors consider there is sufficient brownfield site availability to meet development needs, without releasing Green Belt. There is therefore no sound evidential basis on which to modify the Plan to remove the proposed Green Belt release.

Of course, the Council will continue to keep up to date on changes to national planning policy and legislation, but there is no clear directive from Government at this stage to suggest the Council should change its approach. Indeed, following the publication of the Planning White Paper last year, which mooted changes to the planning system, the Government's Chief Planner strongly encouraged Local Authority's to continue in the preparation and adoption of Local Plans as St Helens has done.

Kind Regards

Sean Traynor
Director of Strategic Growth
Place Services | St.Helens Council | Town Hall | Corporation Street | St.Helens | Merseyside | WA10 1HP

████████████████████
██

From: Su Barton [REDACTED]

Sent: 10 October 2021 18:13

To: Councillor David Baines [REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

I hope this finds you well. ECRA, with Windle are encouraged to read of the progress being made in breathing new life back into our Town Centres. We look forward to hearing more about this and sincerely hope that it includes affordable housing in Brownfield locations which are well served by infrastructure and accessibility to jobs. As you know, any announcements that include these key issues will be welcomed by residents and business alike, as well as ensuring we are protecting our climate by potentially reducing pollution from unnecessary private car journeys.

You will also be aware that Boris Johnson and Michael Gove are reviewing the NPPF and Planning law. In his speech to the party conference, Boris stated that 'you can... see how much room there is to build the homes that young families need... beautiful homes, on brownfield sites in places where homes make sense.' There is certainly an indication that both housing targets and building on Green Belt are being reviewed by central government.

With this in mind, and looking forward to your announcement on the future of our Borough, it would be the ideal opportunity to ensure that the Major Modifications to the Local Plan acknowledge the increased availability of Brownfield sites and look to eliminate all planned building on Green Belt. ECRA have previously shown how this can be done in our responses to the consultation. If some newspapers are correct, it would appear that the government may look to prevent Local Authorities from removing Green Belt - perhaps St Helens Council could introduce this popular measure prior to any announcement and regain the public trust as a result?

We look forward to hearing more about the developments in due course,

regards,

Su Barton

Communication Lead for ECRA, with Windle

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From: [REDACTED]
Sent: 09 December 2021 15:30
To: [REDACTED]
Subject: The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted

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The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted, this is the list of values it contained. You can turn this email off under workflows in Umbraco Forms.

Title

Mrs

Other title

First Name

Susan

Last Name

Barton

Organisation/company

Address

19 Brooklands Road
Ecclestone

Postcode

WA10 5HE

Telephone Number

[REDACTED]

Mobile Number

[REDACTED]

Email Address

[REDACTED]

Do you have an agent?

No

Agent's Title

Other title for Agent

Agent's First Name

Agent's Last Name

Agent's organisation/company

Agent's Address

Agent's Postcode

Agent's Telephone Number

Agent's Mobile Number

Agent's Email Address

3. Would you like to be kept updated on future stages of the St Helens Borough Local Plan 2020-2035? (Namely publication of the Inspectors' recommendations and adoption of the Plan.)

Yes

4. Which Main Modification does this representation relate to?

MM011

5a. Do you consider that this proposed Main Modification is legally compliant?

No

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

No

6. Please provide a reason for your response to questions 5a and 5b

The Plan is not legally compliant against the criteria "planning the sustainability appraisal". The Habitats Regulation Assessment (2016) is out of date and contains factual inaccuracies.

An example can be seen in the statement "It is not possible to determine if the site (8HS/16HA) is suitable to support a significant population of pink footed goose." Residents have photographic evidence of a substantial number of these geese on 8HA.

The document has not been updated to take account of the change of status of 8HS from allocated to safeguarded.

The Local Plan is not sound, as it is not based on robust or credible evidence. The main criteria mentioned for the selection of "suitable" Green Belt sites remains that parcels are "well contained with strong boundaries". This cannot be an exceptional circumstance for removal from Green Belt. The reasons given in MM011 are inconsistent for each safeguarded parcel and remain questionable.

7. Do you wish to make a representation on another Main Modification?

No

8. Which Main Modification does this representation relate to?

9a. Do you consider that this proposed Main Modification is legally compliant?

9b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

10. Please provide a reason for your response to questions 9a and 9b

11. Do you wish to make a representation on another Main Modification?

12. Which Main Modification does this representation relate to?

13a. Do you consider that this proposed Main Modification is legally compliant?

13b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

14. Please provide a reason for your response to questions 13a and 13b

15. Do you wish to make a representation on another Main Modification?

16. Which Main Modification does this representation relate to?

17a. Do you consider that this proposed Main Modification is legally compliant?

17b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

18. Please provide a reason for your response to questions 17a and 17b

19. Do you wish to make a representation on another Main Modification?

20. Which Main Modification does this representation relate to?

21a. Do you consider that this proposed Main Modification is legally compliant?

- 21b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 22. Please provide a reason for your response to questions 21a and 21b**
- 23. Do you wish to make a representation on another Main Modification?**
- 24. Which Main Modification does this representation relate to?**
- 25a. Do you consider that this proposed Main Modification is legally compliant?**
- 25b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 26. Please provide a reason for your response to questions 25a and 25b**
- 27. Do you wish to make a representation on another Main Modification?**
- 28. Which Main Modification does this representation relate to?**
- 29a. Do you consider that this proposed Main Modification is legally compliant?**
- 29b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 30. Please provide a reason for your response to questions 29a and 29b**
- 31. Do you wish to make a representation on another Main Modification?**
- 32. Which Main Modification does this representation relate to?**
- 33a. Do you consider that this proposed Main Modification is legally compliant?**
- 33b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 34. Please provide a reason for your response to questions 33a and 33b**
- 35. Do you wish to make a representation on another Main Modification?**
- 36. Which Main Modification does this representation relate to?**
- 37a. Do you consider that this proposed Main Modification is legally compliant?**
- 37b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 38. Please provide a reason for your response to questions 37a and 37b**
- 39. Do you wish to make a representation on another Main Modification?**
- 40. Which Main Modification does this representation relate to?**
- 41a. Do you consider that this proposed Main Modification is legally compliant?**
- 41b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?**
- 42. Please provide a reason for your response to questions 41a and 41b**

R00152

Main Modifications of the local plan.

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:32

PB

Philip Bickerton [REDACTED]

Thu 13/01/2022 14:32

To: planningpolicy@sthelens.gov.uk



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I wish to endorse the findings of the Bold & Clock Face action group regarding the Main Modifications of the Local Plan recently submitted by St Helens Council.

Thankyou

Mr Philip Bickerton

[Reply](#) | [Forward](#)

R00153

Main Modifications of the local plan.

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:42

DB

Denise Bickerton [REDACTED]
Thu 13/01/2022 14:42
To: planningpolicy@sthelens.gov.uk



CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Can you please register my support for the recently submitted response to the Local Plan Main Modifications. This was sent in by the Bold & Clock Face Action Group.
Thank you
Mrs Denise Bickerton

[Reply](#) | [Forward](#)

R00154

From: annette billington [REDACTED]
Sent: 11 January 2022 01:17
To: planningpolicy@sthelens.gov.uk
Subject: Main Modification Consultation. Local Plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

To Whom it May Concern

St Helens Green Belt Association have commissioned an expert report, in collaboration with the other Green Belt Support Groups throughout the Borough of St. Helen.

I wish to put on record that I endorse the issues raised and contained in the report of the SHGBA.

Regards
Miss A. J Billington
19, Broadway,
Eccleston,
St. Helens.
WA10 5DQ

RO0180

From: Bohan-Rayson, Aurelie [REDACTED]
Sent: 17 December 2021 13:57
To: planningpolicy@sthelens.gov.uk
Subject: RE: St Helens Borough Local Plan Main Modifications Consultation
Attachments: 375735 St Helens Local Plan Main Modifications - NE reponse.pdf

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir / Madam,

Please find attached Natural England's response to the St Helens Local Plan Main Modifications consultations.

Best wishes,
Aurelie

Aur lie Bohan-Rayson
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]

During the current coronavirus situation, Natural England staff are working remotely and from some offices to provide our services and support our customers and stakeholders. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Wash hands. Cover face. Make space.

www.gov.uk/natural-england



From: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>
Sent: 18 November 2021 12:41
To: planningpolicy@sthelens.gov.uk
Subject: St Helens Borough Local Plan Main Modifications Consultation

Dear Sir/Madam,

Please find attached notification of the St Helens Borough Local Plan Main Modifications public consultation.

For further details on the consultation, please visit www.sthelens.gov.uk/localplanmodifications

Yours faithfully,

The Planning Policy Team

Development Plans Section | Development & Growth Division | Place Services Department | St.Helens Council

Postal Address: Planning Policy Team | St Helens Town Hall | Victoria Square | St Helens | WA10 1HP |

Tel: 01744 676 190

Email: planningpolicy@sthelens.gov.uk

Website: <https://www.sthelens.gov.uk/planning-building-control/planning-policy/>



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Date: 17 December 2021
Our ref: 375735
Your ref: St Helens Borough Local Plan Main Modifications Consultation



BY EMAIL ONLY

Planning Policy Team
St Helens Council

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

planningpolicy@sthelens.gov.uk

Dear Sir / Madam

St Helens Local Plan Main Modifications consultation

Thank you for your consultation on the above dated and received by Natural England on 18 November 2021.

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.

We have reviewed the following documents;

- SHBC036: Schedule of Proposed Main Modifications, November 2021
- SD005.6: Sustainability Appraisal of the Proposed Main Modifications, November 2021
- SD006.2: Habitats Regulation Assessment of the Proposed Main Modifications, November 2021

Having reviewed the documents listed above and the modifications proposed, Natural England is satisfied with the modifications made to the St Helens Local Plan. We support the conclusions arising from the Habitats Regulations Assessment and have no objections to the conclusions made in the Sustainability Appraisal.

We therefore raise no objections to the main modifications made.

If you have any queries relating to the advice in this letter please contact Aurelie Bohan on [REDACTED]

Yours faithfully

Aurelie Bohan-Rayson
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

RO0187

Planning application response

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:59

CB

carol Booth [REDACTED]

Thu 13/01/2022 16:59

To: planningpolicy@sthelens.gov.uk



CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Sent from [Mail](#) for Windows

I agree with the comments made by the RAFFD and disagree with the development on Florida Farm

Carol Booth
14 Avery Rd
WA11 0XA

[Reply](#) | [Forward](#)

RO0197

Houghtons Lane/ East Lancashire Road

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:38

HB

Helen Bowers [REDACTED]
Thu 13/01/2022 14:38
To: planningpolicy@sthelens.gov.uk



CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Hi - I have previously emailed at length as I am opposed to the land mentioned being removed from the greenbelt for the purpose of building. I also object to removing the land from the greenbelt to be safeguarded with the obvious option to build. I heard that the modification consultation is coming to an end. Please register my opposition to any removal of this land from the Green belt.
Kind regards
Helen

Get [Outlook for Android](#)

[Reply](#) | [Forward](#)

RO0208

From: [REDACTED]
Sent: 10 January 2022 19:07
To: planningpolicy@sthelens.gov.uk
Subject: LOCAL PLAN

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dennis Briers
165 Liverpool Road
Haydock
St Helens
WA11 9RX

Please take this email as my support for comments made by Garswood Residents Action Group and Residents against the Florida Farm Developments in relation to the main modifications in the local plan.

regards

RO0209

[REDACTED]

From: Stephen Brine <[REDACTED]>
Sent: 11 January 2022 18:54
To: planningpolicy@sthelens.gov.uk
Subject: St Helens Borough Local Plan 2020-2035 (Submission Draft)
Attachments: Final Response.docx; PART B - MM07.docx; PART B - MM06.docx; PART B - MM011.docx

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

I attach my response which consists of a Form A & 3 additional Form B's.
Please acknowledge safe receipt.

Yours faithfully,

Stephen Brine
[REDACTED]

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.

4. Which Main Modification does this representation relate to?

Main Modification Reference Number **MM06**

5a. Do you consider that this proposed Main Modification is legally compliant?

Yes

No x

Please tick as appropriate

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

Yes

No x

Please tick as appropriate

6. Please provide a reason for your response to questions 5a and 5b above.

MM06

Section 5. Object. I maintain my objection that Green Belt release and the identification of safeguarded land is not necessary. The words "full review" should be reinstated, section 5 should then read "following a full review or update of this Plan". This will bring section 5 into line with paragraph 140 of NPPF that reads "through the preparation or updating of plans" – both full review and update should and can be referenced to make the Plan consistent with national policy (NPPF, paragraph 35d).

Section 4.6.10 Object. I maintain my objection that Green Belt release and the identification of safeguarded land is not necessary

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.

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

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment.

4. Which Main Modification does this representation relate to?

Main Modification Reference Number **MM011**

5a. Do you consider that this proposed Main Modification is legally compliant?

Yes

No x

Please tick as appropriate

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

Yes

No x

Please tick as appropriate

6. Please provide a reason for your response to questions 5a and 5b above.

MM011

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

SHBC's exceptional circumstances argument is flawed. By acknowledging that this is a "significant greenfield site" and that the site "forms a sizeable outward extension of the urban area into the countryside" – SHBC's "exceptional circumstances" case demonstrates that the site serves 3 of the 5 purposes of Green Belt:

- a) it checks the unrestricted sprawl of a large built-up area;
- c) it assists in safeguarding the countryside from encroachment; and
- e) it assists in urban regeneration, by encouraging the recycling of derelict and other urban land.

The MM wording demonstrates that the site makes a high, rather than low, overall contribution to the purposes of Green Belt.

I also note that there are a "number of technical issues" associated with 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.

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

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment.

4. Which Main Modification does this representation relate to?

Main Modification Reference Number **MM07**

5a. Do you consider that this proposed Main Modification is legally compliant?

Yes

No

Please tick as appropriate

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

Yes

No

Please tick as appropriate

6. Please provide a reason for your response to questions 5a and 5b above.

MM07

LPA06, to which Main Modification 11 refers, includes a housing target of 486 per annum over 15 years. This is also carried forward to justify safeguarding Green Belt for another 15 years (2037 - 2052). It has been shown that this housing target is not sound for many valid reasons.

St Helens Council have added a further reason this week. On Wednesday 12th January 2022 (the day before this consultation closes) the Council are being asked to approve a new Draft Housing Strategy. This strategy acknowledges that the household growth in St Helens is less than the North West generally and equates to 407 households per year.

The Local Plan cannot be considered sound when Council Policies directly contradict each other, using different housing targets. The Local Plan should use the lower of these housing targets for the 15 years of the plan and remove all safeguarded land to protect the Green Belt as it is clear that forecasting housing need between 2037 and 2052 is not a sensible approach when growth is unpredictable.

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.

**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)
Proposed Main Modifications Consultation
Response Form**

Ref:

(For official use only)

Please ensure the form is returned to us **by no later than 5pm on Thursday 13th January 2022**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Brine	Last Name:
Organisation/company:	Organisation/company:
Address: Friars Cottage, Houghtons Lane, Eccleston, St Helens, Postcode: WA10 5QE	Address: Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

10/01/2022

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.

3. Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (Namely publication of the Inspectors' recommendations in their Final Report and then 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 Thursday 13th January 2022** by:

post to: **Freepost LOCAL PLAN,
St Helens Borough Council,
St. Helens Town Hall,
Victoria Square,
St Helens,
WA10 1HP**

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

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

FURTHER INFORMATION

If you need assistance, you can contact us via:

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

NEXT STEPS

All representations received within the representations period, will be passed on to the appointed Local Plan Inspectors, who will consider and use them to inform their final conclusions on the Local Plan Examination.

DATA PROTECTION

Please note that all representations received within the consultation period will be made public and passed on to the Planning Inspectors. This will include the names and addresses of representors being made public, although other personal details will remain confidential. Further clarity on this is available on the Local Plan Privacy Notice available on the Local Plan webpage (address below). The Council is unable to accept anonymous or confidential representations.

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.

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.

4. Which Main Modification does this representation relate to?

Main Modification Reference Number **MM**

5a. Do you consider that this proposed Main Modification is legally compliant?

Yes

No x

Please tick as appropriate

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

Yes

No x

Please tick as appropriate

6. Please provide a reason for your response to questions 5a and 5b above.

I support the Responses to the Main Modifications given by Michael Wellock of Kirkwells on behalf of the St Helens Green Belt Association.

In addition, my personal main concerns are in relation the land known as 8HS and in particular I would also refer to the attached further Part B's.

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.

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

RO0263

[REDACTED]

Sent: 13 January 2022 13:00
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan for Haydock

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Local Plan for Haydock
Dear Sir/Madam
I agree with the comments of RAFFD and GRAG about the local plan.
Yours Faithfully,
Mr D Cain, 7, Chirton Close, Haydock, WA11 0FG

Sent from my Galaxy

Local Plan for Haydock,

Dear Sir/Madam I agree with the comments of RAFFD and GRAG about the local plan.Yours Faithfully, Mr D Cain, 7, Chirton Close, Haydock, WA11 0FGSent from my Galaxy

RO0290

[REDACTED]

From: Councillor John Case
Sent: 08 January 2022 11:42
To: planningpolicy@sthelens.gov.uk
Cc: [REDACTED]
Subject: Local Plan. Site 8HA. Higher Lane/Rookery Lane, Rainford. 259 units

Dear Sir/Madam,

I would like to express my opposition to this part of the plan. I am not a NIMBY and do believe that Rainford and St Helens need extra housing, but certainly not on this scale. 259 units in the location is far too many, in my view.

Amongst the reasons for objection are:

- Over 1,000 units will be built on brownfield site at Cowley Hill Lane. This is a good use of brownfield land. This number of units should be enough in itself to sustain any increases in population for numerous years. There are also plans for 200-300 units in Sutton. Surely 1300 units is enough.
- This is Grade 1 agricultural land. We need to grow our own food as a country.
- Building houses is environmentally damaging and St Helens council make much of their "green strategy". Words rather than deeds comes to mind.
- The land regularly floods. If you take a look now the bottom of this field is currently flooded. Building houses will exacerbate the problem and potentially lead to flooding of the linear path and the industrial units.
- Traffic congestion is an issue in Rainford and Rookery Lane is a potential traffic black spot already. With more vehicles leaving the new houses then this road will become more congested and dangerous.
- Rainford has a shortage of school places, doctors appointments and dentistry. This will make the problem far worse.
- Traffic accessing the by-pass will potentially have to use the Mill Lane Junction. There was a fatality there last year and several serious accidents. The council and police are currently reviewing the suitability of this junction. Added traffic will without doubt lead to more accidents.
- Building 259 houses will mean the destruction of habitats for many species of bird and animals.
- Public opinion in Rainford is against the development of this site for housing.

I hope that you take these points into consideration and stop an unwanted and unpopular development.

Best regards,

Cllr John Case
Rainford Ward
St Helens Borough Council
[REDACTED]

R00297

[REDACTED]

From: Rene Cassidy [REDACTED]
Sent: 10 January 2022 14:14
To: planningpolicy@sthelens.gov.uk
Subject: Modifications to local plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern

I have read through the findings which were identified by the Bold and Clock Face action group and totally agree with their findings.

Regards
Mrs R Cassidy

RO0301

RE: External Mail: St Helens Borough Local Plan Main Modifications Consultation

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:43

KP

Knowsley Local Plan
Thu 13/01/2022 16:43
To: planningpolicy@sthelens.gov.uk



CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon,

Thank you for sending Knowsley Council information relating to the St. Helens Borough Local Plan Submission Draft: Schedule of Proposed Main Modifications consultation. I can confirm that Knowsley Council has no comments to make regarding the legal compliance and soundness of the Schedule of Proposed Main Modifications.

Kind regards,
Scott Brett
Lead Officer Planning Policy
Planning
Regeneration and Economic Development
Knowsley Council

Address: Nutgrove Villa, Westmorland Road, Huyton, Knowsley, L36 6GA

From: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>
Sent: 18 November 2021 12:41
To: planningpolicy@sthelens.gov.uk
Subject: External Mail: St Helens Borough Local Plan Main Modifications Consultation

CAUTION: This email originated from an external source. If you suspect a potential phishing email, report it via the IT Self Service Portal which can be found within the Quick Links section on Bertha

Dear Sir/Madam,

Please find attached notification of the St Helens Borough Local Plan Main Modifications public consultation.

For further details on the consultation, please visit www.sthelens.gov.uk/localplanmodifications

Yours faithfully,

The Planning Policy Team

Development Plans Section | Development & Growth Division | Place Services Department | St.Helens Council
Postal Address: Planning Policy Team | St Helens Town Hall | Victoria Square | St Helens | WA10 1HP |
Tel: 01744 676 190
Email: planningpolicy@sthelens.gov.uk
Website: https://www.sthelens.gov.uk/planning-building-control/planning-policy/



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Reply | Reply all | Forward

RO0302

[REDACTED]

From: zoe [REDACTED]
Sent: 07 January 2022 15:19
To: planningpolicy@sthelens.gov.uk
Subject: Bold and Clock Face Action Group

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Miss Zoe Chadwick
18, Crawford Street
Clock Face
St. Helens
WA9 4XQ

I have read through the findings which were identified by the Bold and Clock face action group and agree to the findings.

Regards,

Zoe Chadwick

RO0313

From: cmsadmin@sthelens.gov.uk
Sent: 13 January 2022 13:36
To: planningpolicy@sthelens.gov.uk
Subject: The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted, this is the list of values it contained. You can turn this email off under workflows in Umbraco Forms.

Title

Mrs

Other title

First Name

Maureen

Last Name

Chorley

Organisation/company

private household

Address

8

SPINNEY GREEN, ECCLESTON

ST HELENS

Postcode

WA10 5AH

Telephone Number

[REDACTED]

Mobile Number

Email Address

[REDACTED]

Do you have an agent?

No

Agent's Title

Other title for Agent

Agent's First Name

Agent's Last Name

Agent's organisation/company

Agent's Address

Agent's Postcode

Agent's Telephone Number

Agent's Mobile Number

Agent's Email Address

3. Would you like to be kept updated on future stages of the St Helens Borough Local Plan 2020-2035? (Namely publication of the Inspectors' recommendations and adoption of the Plan.)

Yes

4. Which Main Modification does this representation relate to?

MM004

5a. Do you consider that this proposed Main Modification is legally compliant?

No

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

No

6. Please provide a reason for your response to questions 5a and 5b

See SHGBA document - protect green belt

7. Do you wish to make a representation on another Main Modification?

No

8. Which Main Modification does this representation relate to?

9a. Do you consider that this proposed Main Modification is legally compliant?

9b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

10. Please provide a reason for your response to questions 9a and 9b

11. Do you wish to make a representation on another Main Modification?

12. Which Main Modification does this representation relate to?

13a. Do you consider that this proposed Main Modification is legally compliant?

13b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

14. Please provide a reason for your response to questions 13a and 13b

15. Do you wish to make a representation on another Main Modification?

16. Which Main Modification does this representation relate to?

17a. Do you consider that this proposed Main Modification is legally compliant?

17b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

18. Please provide a reason for your response to questions 17a and 17b

19. Do you wish to make a representation on another Main Modification?

20. Which Main Modification does this representation relate to?

21a. Do you consider that this proposed Main Modification is legally compliant?

21b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

22. Please provide a reason for your response to questions 21a and 21b

23. Do you wish to make a representation on another Main Modification?

24. Which Main Modification does this representation relate to?

25a. Do you consider that this proposed Main Modification is legally compliant?

25b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

26. Please provide a reason for your response to questions 25a and 25b

27. Do you wish to make a representation on another Main Modification?

28. Which Main Modification does this representation relate to?

29a. Do you consider that this proposed Main Modification is legally compliant?

29b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

30. Please provide a reason for your response to questions 29a and 29b

31. Do you wish to make a representation on another Main Modification?

32. Which Main Modification does this representation relate to?

33a. Do you consider that this proposed Main Modification is legally compliant?

33b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

34. Please provide a reason for your response to questions 33a and 33b

35. Do you wish to make a representation on another Main Modification?

36. Which Main Modification does this representation relate to?

37a. Do you consider that this proposed Main Modification is legally compliant?

37b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

38. Please provide a reason for your response to questions 37a and 37b

39. Do you wish to make a representation on another Main Modification?

40. Which Main Modification does this representation relate to?

41a. Do you consider that this proposed Main Modification is legally compliant?

41b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

42. Please provide a reason for your response to questions 41a and 41b

RO0320

[REDACTED]

From: Leslie Clancy <[REDACTED]>
Sent: 13 January 2022 11:18
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir,

I agree wholeheartedly with the comments of RAFFD and GRAG on the local plan.

Yours faithfully

Leslie Charles Clancy

97 Taylor Road
Haydock
St Helens
WA11 9YG



RO0330



ST HELENS
BOROUGH COUNCIL

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Proposed Main Modifications Consultation
Response Form

Ref:

(For official use only)

Please ensure the form is returned to us by no later than **5pm on Thursday 13th January 2022**. 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: CARL	First name:
Last Name: CLORAIN	Last Name:
Organisation/company:	Organisation/company:
Address: OVENSACK FARM, WINWICK LAWE, WARRINGTON	Address:
Postcode: WA3 7EW	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Mr Carl Cloran
Ovenback Farm
Winwick Lane
Warrington WA3 7EW
Tel [REDACTED]
Email [REDACTED]

Signature: [REDACTED] Date: 13-12-2021

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.

3. Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (Namely publication of the Inspectors' recommendations in their Final Report and then adoption of the Plan)

Yes (Via Email) [REDACTED] 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 Thursday 13th January 2022** by:

post to: Freepost LOCAL PLAN,
St Helens Borough Council,
St. Helens Town Hall,
Victoria Square,
St Helens,
WA10 1HP

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

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

FURTHER INFORMATION

If you need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

All representations received within the representations period, will be passed on to the appointed Local Plan Inspectors, who will consider and use them to inform their final conclusions on the Local Plan Examination.

DATA PROTECTION

Please note that all representations received within the consultation period will be made public and passed on to the Planning Inspectors. This will include the names and addresses of representors being made public, although other personal details will remain confidential.

Further clarity on this is available on the Local Plan Privacy Notice available on the Local Plan webpage (address below). The Council is unable to accept anonymous or confidential representations.

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.

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.

4. Which Main Modification does this representation relate to?

Main Modification Reference Number LINK ROAD MM

New Link Road from Parkside

5a. Do you consider that this proposed Main Modification is legally compliant?

Yes

No

Colliery to Winwick Lane

Please tick as appropriate

5b. Do you consider that this proposed Main Modification is 'sound' (in accordance with the definition in the National Planning Policy Framework)?

Yes

No

Please tick as appropriate

6. Please provide a reason for your response to questions 5a and 5b above.

Dear Planners,
I am seeking Environmental Compensation for the new Parkside Colliery Link Road which is right on my doorstep. I am objecting to the new altered Road Plus the construction of the large new roundabout. I purchased my property to look at Green belt land. Your Plan takes this away from our family home. Could a member of your team contact me regarding compensation or do I need a solicitor to act for me.

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.

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

R00337

[REDACTED]

From: Planning St Helens
Sent: 07 January 2022 14:43
To: planningpolicy@sthelens.gov.uk
Subject: Fw: Local plan main modifications

Hi,

I think this one is local plan related.

Thanks

[REDACTED]

From: [REDACTED]
Sent: 07 January 2022 14:41
To: Planning St Helens <Planning@sthelens.gov.uk>
Subject: Local plan main modifications

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dear or Madam

I fully support the observation submitted to you by the St. Helens green belt association in respect of the above
With regards to removing the green belt in Garswood on Smock lane and leyland green road
The doctors surgery is full and no longer accepting new patients
No lift at railway station for disabled access
Smock lane floods regularly
Wigan council voted to build 1500 houses resulting in urban sprawl

Mr Steve Collins
57 thornhill Road
Garswood
WN40SR

Sent from my iPhone

R00338

[REDACTED]

From: Planning St Helens
Sent: 11 January 2022 08:19
To: planningpolicy@sthelens.gov.uk
Subject: FW: Local plan

Think this may be for you?

Kind regards,

[REDACTED]

****Please note, we are currently working remotely due to Covid 19 restrictions****

-----Original Message-----

From: julie collins [REDACTED]
Sent: 10 January 2022 21:16
To: Planning St Helens <Planning@sthelens.gov.uk>
Subject: Local plan

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Dear Sir or Madam

I endorse the comments made by GRAG and Raffd I object to the local plan and building on our green belt on smock lane and leyland green road Doctors full School full Station has no lift Lack of buses

Mrs julie collins
57 thorn hill rd
Garswood
Wn40sr

Sent from my iPhone

R00365

From: Ann Cooper [REDACTED]
Sent: 11 January 2022 13:54
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

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Please note that I support the comments made by Residents Against Florida Farm Developments and Garswood Residents Action Group.

Ann Cooper
16 Darvel Ave
Garswood
WN4 0UA

Thank you and regards

Ann Cooper

Sent from Windows Mail

R00366

CPRE comments to the St Helens local plan main modifications consultation Blue category

- Flag for follow up. Start by 18/01/2022. Due by 18/01/2022.
- Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:40

Jackie Copley Thu 13/01/2022 15:40 ✉️ 📧 ↶ ↷ → ...
 To: planningpolicy@sthelens.gov.uk

2022 CPRE Lancashire m... 248 KB	2022 CPRE Lancashire m... 2 MB
-------------------------------------	-----------------------------------

2 attachments (2 MB) [Download all](#)

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Dear Planning Policy Team,

Please find a letter attached (in both word and pdf formats) in response to the main modifications consultation.

Please confirm receipt.

I hope the local plan will be progressed to adoption without unnecessary delay with policies and allocations to best protect and enhance the countryside and greenspace in St Helens for the benefit of all in the future.

Yours sincerely

Jackie Copley MA, BA, (Hons), PgCert, MRTPI
 Planning Manager



CPRE Lancashire, Liverpool City Region and Greater Manchester
 07718070750
www.cprelancashire.org.uk

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The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

Acres Brook, Sabden Road,
Higham, Lancashire, BB12 9BL
Tel: [REDACTED]
Email: [REDACTED]
www.cprelancashire.org.uk

Planning Policy Team
Wesley House,
Corporation Street,
St. Helens,
WA10 1HF,

By email: planningpolicy@sthelens.gov.uk

Patron
Her Majesty The Queen
President
Emma Bridgewater CBE
Group President
Nick Thompson
Group Chair
Debbie McConnell
Scientific Adviser
Des Brennan

13th January 2022

Dear Planning Policy Team,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester concerning the St Helens Borough Local Plan 2020-2035 Submission draft schedule of proposed main modifications, November 2021.

CPRE

CPRE, the countryside charity, campaigns for a thriving, beautiful countryside, and greenspace for everyone, which unfortunately, are under threat – from pollution, litter, irresponsible development, and a host of other pressures.

You might remember us as ‘The Campaign to Protect Rural England’ and for nearly 90 years we have brought about countryside protection and we are proud of our achievements including the establishment of National Parks, Areas of Outstanding Natural Beauty, Green Belt, Hedgerow Regulations, Quiet Lanes amongst other important planning policy tools.

At our heart we are advocates of a local development plan-led system, accepting the importance of democratic planning decisions and environmental goals.

We help CPRE members and the public to better engage with planning matters and throughout 2021, with an increased understanding from the pandemic of just how vital access to greenspace is for our health and well-being we continued to have success.

Our focus has been:

- nature and landscapes;
- better places to live;
- farming;
- sustainable transport; and,
- climate and energy.

Recently, CPRE's award winning public affairs campaign, convinced the Government to scrap its ill-advised planning white paper reform, which threatened democracy, nature, and provision of [much needed rural affordable housing](#), among other harms.

That is not to say we are content with the planning system, frankly the National Planning Policy Framework (NPPF) is not fit for purpose. The imposition of mandatory out of date high growth, inflates job and housing targets resulting in councils being [Set up to Fail](#) with the result of an acceleration in 'off' local plan countryside loss, when councils inevitably fail the stringent Housing Delivery Test. Hence, it promotes development of greenfields, including Green Belt in advance of brownfield, despite claims to the contrary. It has an unsustainable road focus that has caused [rural transport deserts](#) and the most unpopular and costly to the public sector 'planning by appeal'. The NPPF is a 'developers' charter' and in future, the focus must change to stop widespread degradation of our environment and the health problems and harm to biodiversity that result.

We are lobbying Michael Gove in the 'Levelling Up Reform' to make the system more sustainable, based on integrated sustainable transport and local decisions. The NPPF must no longer trail so woefully behind public opinion on the value of the environment. Furthermore, we will object to any attempt by ministers to throw out legal rulings that they do not like.

Brownfield first

CPRE's [Recycling our land: The state of brownfield report, 2021](#), evidences there is a lot of available brownfield land in all regions, yet between 2006 and 2017, the proportion of brownfield land used for housing decreased by 38%. Over the same period the use of greenfield land has increased by 148%. The situation is worse for the North West due to its role in the industrial revolution, and especially St Helens. More brownfield funding for the north to invest in its industrial legacy is required and to help.

CPRE produced a [brownfield land register toolkit](#) with local community input to enable people identify more wasted brownfield sites for reuse, and we ask if you could please signpost people, perhaps have a link to it on your website's Brownfield Register page.

St Helens Council should amend the local plan to allocate more previously developed land and in doing so avoid Green Belt loss.

Planning tools

We encourage St Helens Council to take advantage of what control it has at its disposal to maximise opportunities to benefit the environment. This is vital through the local plan process. Developers should be encouraged to better design schemes, maximising clean energy and insulation ([Building for a Healthy Life](#)) with no loss of our natural assets including biodiversity, tranquility, high grade farmland, mature woodland, trees and hedgerows. Mitigation and compensation must be adequate and enforceable. Developments that do not support climate and biodiversity goals should be refused.

It is with the above in mind that I offer in Appendix 1.0 CPRE's comments by reference to the modification number. We acknowledge the parameters within which the local plan was examined.

In addition, CPRE broadly support the comments of the residents' groups of St Helens Green Belt Group, Eccleston Community Residents Association (ECRA), Residents against Florida Farm Developments, Bold and Clock Face Action Group and Parkside Action Group.

We hope that the local plan representative of local concerns will be adopted without unnecessary delay as without one in place our rural and urban greenspace, including designated Green Belt, is most vulnerable to speculative development, which is the least sustainable and most harmful form of development.

I hope this information is of help. Please contact me without hesitation if you require further information.

Yours sincerely

Jackie Copley MA, BA, (Hons), PgCert, MRTPI
Planning Manager

Appendix 1.0: CPRE response to schedule of proposed Main Modifications, November 2021

MM001

CPRE accepts the requirement in line with the NPPF to revise the timescale.

MM002

CPRE supports the need for regular monitoring to track performance and for the local plan to be revised to ensure the plan is effective and that the Council is kept accountable for land use decisions. Regrettably, if land is 'unnecessarily' released from Green Belt it is likely to be brought forward in advance of brownfield land with all the economic, social and environmental negative consequences. Performance monitoring to ensure a true brownfield first approach is therefore recommended.

MM003

CPRE welcomes the reference to the Council's 'Climate Emergency Declaration' and it hope the local plan policies and allocations will truly reflect this in the policy text and allocations identified.

We recommend reference to the Climate Change Committee's [Guidance for Local Authorities](#) on its 6th Carbon Budget, and the RTPI and TCPA [A guide for local authorities on planning for climate change](#) show the necessary pathway for local councils to follow.

MM004

The specified SPDs are noted. CPRE agrees that adequate developer contributions are required to ensure sufficient community and green infrastructure, such as low carbon travels options and more tree and hedgerow planting for landscape and ecological mitigation to ensure biodiversity improvements and sustainable developments.

MM006

CPRE supports bullet 3. However, 'suitable' is a narrow definition used by Government in the criteria for the brownfield registers, relating to availability, developability and deliverability. Whereas the local plan should effectively enable all brownfield land to come forward during the plan period. The reuse of previously developed land by removal of constraints in key settlements should be a priority. If not, St Helens will continue to be blighted by contaminated land. The removal of constraints should be supported by partnership action and investment with the English Cities Fund. If the Government is serious about 'levelling-up' the North, St Helens ought to be able to access additional funding to reclaim constrained sites due to its industrial legacy. Please do not assume that brownfield land is finite as the CPRE research in 2019 showed land for 1 in 7 homes became available in the past 12 months.

CPRE objects to bullet 5. CPRE reasserts that the Council is planning for too many houses due to an assumed very high jobs growth underpinning the evidence base. When considering the Office of National Statistics population based data is consistently showing growth is down (2014, 2016 and 2018) the housing requirement appears unrealistic. The Council will be [Set up to Fail](#). Thus, the release of such a large extent of Green Belt land for development and safeguarding until 2037 is unnecessary.

However, in the future, any justified release of Green Belt in the future for development purposes should require compensatory improvements. It is noted that assessment will be on an individual application basis and there is concern about how this will operate in practice and the burden that will be placed at a cost to the Council. Developers rarely concede to any compensation without a bitter legal fight.

Bullet 7. CPRE echoes the concerns of the Parkside Action Group and objects to the development of Parkside West for a road-based logistics development.

CPRE did support the original regional spatial plan and local development plan policy for a Strategic Rail Freight Interchange, as a multi-modal interchange would tackle the current unsustainable road-based haulage. More rail freight would reduce greenhouse gas emissions, and improve local amenity, reduce traffic congestion on the strategic and local road networks and tackle associated health problems due to air and noise pollution.

Despite claims to the contrary, it is widely doubted that a rail interchange will ever be realised at this uniquely located site served by two rail lines (north/south and east/west) and two motorways and it represents a huge opportunity cost for St Helens. The lack of strategic rail freight planning for expansion of Liverpool Port is appalling, and it is the Port that is wielded as the justification for so much land release from Green Belt. There should be more strategic planning evident.

Parkside East is currently agricultural land of high-grade and in CPRE's view, it should be retained for its enormous value as a natural asset for future generations.

4.6.11 CPRE remains concerned that The Duty to Cooperate has not been meaningful, much to do with the way the original evidence base for the Strategic Housing and Employment Market Assessment (SHELMA) was compiled. These flaws have been rolled forward with all areas of the Liverpool City Region and beyond pushing for high growth with no source of the people to fill the jobs and homes cited as needed. CPRE does not think the high growth is robustly evidenced, particularly given the reality of the uncertain economy, with impacts of Brexit and Covid. The author of the SHELMA Nick Ireland of GL Hearn acknowledges that if that report were written in today's context the picture would be very different. The urban uplift of cities by +35% for Liverpool is completely ignored.

4.6.19 Requires an edit to properly translate the NPPF meaning.

CPRE opposed to the Green Belt loss at Bold and Clock Face and we echo the concerns expressed by the Bold and Clock Face Action Group. The Bold Forest Area Action Plan should be supported and there is concern that the local plan allocation undermines it.

MM007

CPRE welcomes that the employment land requirement has been reduced by 42.16 hectares, however, remains of the opinion that the jobs requirement is beyond what it should be. CPRE reasserts that the Council is planning for too many jobs due to flaws in the evidence base (the ELNS Addendum Report relied on the Liverpool City Region SHELMA) and we queried the robustness of Table 4.3 at the examination. Dr Glenn Athey wrote a critical appraisal of the economic evidence base in this regard commissioned by St Helens Green Belt Group. Due to issues with the robustness of the evidence base the exceptional circumstances to release Green Belt are disputed and it is believed the proposed employment sites should be deleted.

CPRE remains opposed to the development of 1EA- Omega South Western Extension Land North of Finches Plantation, Bold, as the land is important for farmland and ecology and has deciduous woodland that would be lost. The jobs claimed from logistics is very low density and there is considerable replacement of humans by automation planned in the future. How much value jobs in the logistics sector will be to supporting the most deprived areas of St Helens remains to be seen.

4.12.29 - Parkside East is currently agricultural land of high-grade and in CPRE's view, it should be retained for its enormous value as a natural asset for future generations. Parkside West should be used for a Strategic Rail Freight Interchange.

The local plan references Covid to ease development of land in the future. However, the full market impacts of Covid are not yet known. Many companies have gone into administration, others have vacated commercial property as people are working from home and are shopping online. CPRE recommends a cautious approach to ensure previously developed land is reused in advance of bulldozing greenfield land.

MM008

CPRE remains opposed to the development of Green Belt land for employment and advocates the reuse of St Helens significant quantity of brownfield land.

MM009

CPRE reasserts that the Council is planning for too many houses due to an assumed very high jobs growth underpinning the evidence base. The revised Standard Method (2020, with cities and urban centres uplift) indicates 424 dwellings per annum, and it is noted that this is referenced in 4.18.4. When considering the public records from the Office of National Statistics of population-based data (2014, 2016 and 2018) the housing requirement appears unrealistic. The CENSUS data will support this reality. This opinion is supported by Piers Elias, expert demographer undertook an independent appraisal of the evidence base, commissioned by St Helens Green Belt Group.

There has been an absence of duty to cooperate with neighbouring authorities.

There is a source of alternative previously developed land that should and could be brought forward.

Consequently, currently the release of such a large extent of Green Belt land for development and safeguarding until 2037 is unnecessary and unjustified. There are no exceptional circumstances.

CPRE recommends the local plan seeks a higher density of development than that specified, ensuring for quality of design. Recent planning consents in St Helens have achieved more effective use of land with higher densities, and less than 30 dwellings per hectare would not make the effective use of land contrary to Section 11 of the NPPF.

MM010

CPRE accepts sites to be removed as under construction or well progressed.

Our comments about specific sites in the examination hearing statements remain unchanged.

MM011

CPRE remains opposed to the release of land from the Green Belt for safeguarding at the end of the plan period. CPRE believes St Helens has adequate previously developed land to deliver needed development.

St Helens Council have commissioned a Habitat Regulation Assessment as one of their submission documents for the Local Plan. The latest version (October 2021) makes clear that sites are important for ecology. CPRE believes that development of land in the Green Belt is likely to have significant negative effects.

MM013

Support developer contribution main modifications. Delivery of 'genuinely affordable housing'. Please add word genuinely to 6. ii)

MM014

The main modifications concerning green infrastructure improves the proposed local plan policy.

MM016

The local plan should acknowledge the health and well being benefits of access to greenspace.

MM018

CPRE hopes that the Bold Forest Area Action Plan is supported by the local plan policies. We echo Bold and Clock Face Action Group concerns about the main modifications.

MM020

Support. See CPRE comments under MM006 The removal of constraints should be supported by partnership action and investment with the English Cities Fund. If the Government is serious about 'levelling-up' the North, St Helens ought to be able to access additional funding to reclaim constrained sites due to its industrial legacy.

MM021

Please clarify the wording according to NPPF paragraph 134 as “Development that is not well designed should be refused”.

As stated, CPRE remains of the opinion the housing number is inflated. We want ‘genuinely’ affordable homes to be a requirement of new development that meet the thresholds. There should be a higher requirement on greenfield land to better promote the reuse of brownfield land in advance of greenfield and to tackle the need for ‘genuinely’ affordable homes in rural areas.

MM022

CPRE disagrees that ‘First Homes’ are in perpetuity ‘genuinely’ affordable homes. The Government’s definition is flawed and is causing the poorest of households to have least housing provision.

MM026

Support, with the caveat that focusing so much ‘unnecessary’ development on greenfields is clearly contrary to the conservation and enhancement of ecology.

The Environment Act 2021 should be referred to as opposed to the Environment Bill.

Although CPRE welcomes the 25-Year Environment Plan and concept of ‘biodiversity net gain’, Defra is still grappling with metrics and has recently published version 3.0. colleagues are understandably concerned about how effective the calculations will be in practice as ecologists commissioned by developers will assess the baseline and biodiversity at each stage of the development.

There is scope for land to be undervalued and the development impacts overstated for the +BNG of 10% calculation to be achieved. Merseyside Environmental Advisory Service is the third party that rubber stamp’s developer’s approaches to their environment statement, but the raw data is not subject to scrutiny. This is of concern, particularly as the Natural Capital Committee reported last year that all our natural assets have been degraded.

The ‘business as usual’ model with greenfield development being progressed at an alarming rate will only continue to harm ecology, especially rare and dwindling farmland birds as farmland, woodland and sensitive habitats are lost and disturbed. The large incursions in Green Belt are particularly problematic and threaten many species from high levels of urbanisation and a dramatic increase in HGV activity.

MM027

Support. Please see reference to the Climate Change Committee’s [Guidance for Local Authorities](#) on its 6th Carbon Budget, and the RTPI and TCPA [A guide for local authorities on planning for climate change](#) show the necessary pathway for local councils to follow.

MM028

Support, as intrinsic character of the countryside is highly valued by the public and ought to be protected and enhanced by the local plan. We understand that St Helens does not have a ‘valued

landscape' in so far as it is not a designated National Park or Area of Outstanding Natural Beauty.

MM035

Support reference in 3. to appropriate landscaping and tree-lined streets.

Support refence in 6. To ensure Borough's heritage assets are conserved and enhanced.

Support reference in point 7 to hedgerow. Suggest reference to the 1997 Hedgerow Regulations in the local plan text. In 2021, we published the [Hedge Fund Report](#), which shows one of the best ways to simultaneously tackle the climate crisis, boost nature and grow our economy is by restoring and increasing the UK's hedgerow network. Shockingly, we have lost 50% of our hedgerows since the Second World War and they are still in decline. We will progress our work on hedgerows with local groups in 2022.

CPRE has no further comments at the main modifications stage. However, reiterates comments made in our earlier responses to the local plan consultations and hearing statements in evidence to the examination on specific sites. We acknowledge the best way to achieve sustainable development is via the adoption of a local plan with policies and allocations to guide future decisions on appropriate land use. Our mission is to ensure that rural areas and greenspace are championed, properly valued for the benefit of all in the future.

R00367

From: Philip Corcoran [REDACTED]
Sent: 11 January 2022 10:38
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

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i support the comments made by RAFFD and GRAG
i wish to object to this,,it will destroy the last remaining green belt along the lancs .devalue our properties
and create noise.disruption and chaos for yrs '
this area cant sustain this level of building .please listen to the ratepayers .because we cant get green belt back.
philip corcoran
16 avery rd
haydock
wa110xa

R00375

St Helens Borough Local Plan 2020-2035 Main Modifications

Representations on Behalf of Mr Andrew Cotton

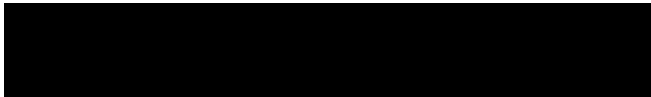
December 2021

St Helens Borough Local Plan 2020-2035
Main Modifications

Representations on Behalf of Mr Andrew Cotton

Project Ref:	26800	26800	26800
Status:	DRAFT	DRAFT	FINAL
Issue/Rev:	1	2	3
Date:	30/11/2021	02/12/2021	02/12/2021
Prepared by:	MD	MD/jc	MD
Checked by:		DM	DM
Authorised by:			DM

Barton Willmore LLP
Tower 12
18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ



Ref: 26800/A3/MD/DM/jc
Date: December 2021

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1.0 INTRODUCTION

- 1.1 St Helens Borough Council (herein 'the Council') is inviting comments on the proposed Main Modifications to the St Helens Borough Local Plan 2020-2035 (eSHLP).
- 1.2 These representations have been prepared and submitted by Barton Willmore LLP on behalf of Mr Andrew Cotton ('the Client')
- 1.3 The Client has interests at Travers Farm, to the south of Bold Road and west of Neills Road in St Helens. This land forms part of the proposed strategic allocation known as Land bounded by Reginald Road / Bold Road / Travers Entry / Gorse Lane / Crawford Street, Bold (Bold Forest Garden Suburb) referred to in the eSHLP as 4HA.
- 1.4 Representations have been made throughout the preparation of the eSHLP in support of 4HA and Barton Willmore appeared at the Hearing Sessions informing the examination.
- 1.5 In September 2021, the Inspectors undertaking the examination issued a Post-Hearing Advice Note detailing matters that needed to be resolved for the eSHLP to be considered sound. The elements of relevance to the Client's interests are listed in Section 2 of these representations.
- 1.6 In Section 3, these representations will comment on their suggested changes made as part of the Main Modifications and whether these result in the eSHLP being sound. Where they do not, alternatives are suggested.

2.0 RELEVANT PARTS OF THE POST-HEARING ADVICE NOTE

2.1 The Post-Hearing Advice Note sets out the Inspectors' views on changes necessary in order to ensure that the eSHLP is sound.

2.2 These are discussed on a policy-by-policy basis.

2.3 The following section of these representations summarise the key points made in relation to policies relevant to the Client's interests at 4HA.

Policy – LPA02 – Compensatory Improvements to Green Belt Land

2.4 The Inspectors state that an amendment is required in order to make the requirement for compensatory improvements to be more explicit, with reference to policies which already seek to address this.

Policy – LPA05 – Meeting St Helens Borough's Housing Needs

2.5 The Inspectors seek modifications of associated tables 4.5, 4.6, and 4.7 as well as Figure 4.3 to reflect the most up to date housing delivery trajectory available.

2.6 This position should be reflective of the Council's letter to the Inspectors on housing (SHBC030) the Council's Housing Position Statement (SHBC031) and the Inspectors' preliminary findings set out in a letter dated 30 July 2021.

Policy – LPA05.01 – Bold Forest Garden Suburb (Site 4HA)

2.7 A site-specific bespoke policy is recommended given the scale and importance of the allocation.

2.8 The content of the policy should be reflective of the requirements currently set out in the Site Profile within Appendix 5 of the eSHLP, as well as referencing any on-site infrastructure that may be required.

Policy – LPC01 – Bungalow

- 2.9 The Inspectors do not consider that adequate justification exists for a blanket requirement for 5% of new homes to be bungalows on greenfield sites. As such, section 3 of this policy is recommended for removal.

Policy – LPC13 – Renewable and Low Carbon Development

- 2.10 Recommends a change of policy wording to reflect what is stated in the Council's Matter 7 Hearing Statement in terms of section 4 of the policy.

3.0 RESPONSE TO THE PROPOSED MAIN MODIFICATIONS

3.1 The response to the main modification will be ordered to correspond to the referencing system within the Main Modification Schedule.

3.2 In general, the main modifications suggested are supported as a means to move to the next stage of the Local Plan process and towards the delivery of much needed homes in St Helens.

MM01

3.3 It is agreed that the Plan Period should be amended to reflect the 15 year requirement from likely adoption.

MM06

3.4 Reference to the delivery of compensatory improvements to land remaining in the Green Belt being considered on a site by site basis as part of the development management process is supported.

3.5 Specifically reference to compensatory improvements being provided in accordance with the provisions of the Bold Forest Park Area Action Plan

3.6 The addition of text explicitly stating that exceptional circumstances exist for the release of Green Belt land for development at a strategic level is welcomed. This always existed but was not previously clear to the reader.

MM08

3.7 The use of the most up to date information to calculate the Local Housing Need is welcomed.

3.8 The revised capacity of 2,114 homes delivered from proposed Green Belt release sites during the plan period is disputed. 4HA has a capacity of 1,200 homes that can be delivered in the plan period if a more realistic trajectory is used. This is discussed in detail under comments on MM10.

3.9 The exceptional circumstances justification set out in relation to 4HA mirrors the Client's view, as expressed in previous representations. The inclusion of this text is therefore supported.

MM018

3.10 The principle of a bespoke policy relating to allocation 4HA is supported as this has been suggested in previous representations. However, amendments are required to ensure that the policy is sound. These are listed below.

3.11 It is considered that 510 dwellings is too low for delivery within the plan period and this should be amended to circa 1,200 homes. The amount of homes deliverable within the plan period should be amended throughout the document to reflect this change.

3.12 It is not clear why provision c) is required in relation to renewable energy as there is already a requirement for this set out at LPC13. Therefore, point c) should be removed from the policy, or reference to requirements on strategic housing sites should be removed from LPC13 to avoid repetition.

3.13 It is not considered necessary for explicit reference to be made to the requirement for proposals to be in accordance with the Bold Forest Plan AAP as proposals that did not accord with this would be unlikely to gain consent. As such, point d) should be deleted.

3.14 It is not clear what 'excessive' means in terms of noise impacts at provision e), particularly given that residential development does not typically result in significantly increased noise levels. There is already a policy that required noise levels to be at acceptable levels (LPD01). Given that noise is not anticipated to be especially high owing to the land use it is more appropriate for the general policy to be applied rather than a site specific requirement. As such provision e) should be deleted.

3.15 The inclusion of a requirement for an overarching masterplan is accepted and the fact that the Council is not insisting on a formal AAP / SPD which would need to be formally adopted by the Council is welcomed.

MM022

- 3.16 The correction of the affordable housing threshold to 10 or more homes is welcomed, as is the reference to First Homes.

Annexe 1

- 3.17 As previously stated, the inclusion of a bespoke policy relating to the allocation of 4HA is supported. Therefore, by extension, so is the removal of the Site Profile from Appendix 5.

Annexe 3

- 3.18 Annexe 3 should be amended so that the figures in tables 5.4 and 5.5 are reflective of 4HA delivering 1,200 homes in the plan period rather than 510.

Annexe 6

- 3.19 The target, trigger for action and potential action of contingency in relation to the new Policy LPA13 are supported. However, it is hoped that, given the scale of the allocation, the Council would be already working with the developers to overcome potential issues, speed up delivery and dedicating significant Development Management resource to the processing of planning applications.

Annexe 8

- 3.20 Table 4.5 should be amended to reflect 1,200 homes being delivered within the plan period, rather than 510.

Annexe 11

- 3.21 Table 4.7 and figure 4.3 should be amended to reflect 1,200 homes being delivered within the plan period, rather than 510.

4.0 SUMMARY AND CONCLUSIONS

- 4.1 The proposed Main Modifications are supported in general, particularly the inclusion of a bespoke policy for 4HA.
- 4.2 However, there are a number of relatively minor amendments that are required to ensure that the policies are sound. These are listed in these representations.
- 4.3 Should you have any questions relating to the points raised in these representations please do contact Barton Willmore LLP.

From: Matthew Dawber [REDACTED]
Sent: 02 December 2021 15:21
To: planningpolicy@sthelens.gov.uk
Cc: Dan Mitchell
Subject: Representations on St Helens LP Main Mods - Andrew Cotton
Attachments: 26800.A3.MD.DM.St Helens LP Main Mods Reps.pdf

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Dear Sir / Madam

Please see attached representations on behalf of Andrew Cotton in relation to the St Helens Local Plan Main Modifications.

I would be grateful if you could confirm receipt of this email and attachment for my records.

Kind regards

Matt

Matthew Dawber
Planning Associate



[REDACTED]
Tower 12, Bridge Street, Spinningfields, Manchester, M3 3BZ

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R00397

From: MARION CROSBY [REDACTED]
Sent: 10 January 2022 14:37
To: planningpolicy@sthelens.gov.uk
Subject: St Helens Green Belt Support 8HS

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I am writing to confirm that I completely endorse the issues raised on behalf of SHGBA that the above mentioned site 8HS be not removed for development in the next 15 years, nor safeguarded for longer term development.

Mrs Marion Crosby
18 Fistril Drive
Windle
St. Helens
WA10 6EF

[Sent from Yahoo Mail for iPad](#)

RO0417

From: Jackie and Jack Cutler <[REDACTED]>
Sent: 13 January 2022 11:19
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Concerning the St Helens Local Plan I fully support the comments made by RAFFD and GRAG.

Please log this submission from:

Mr Timothy John Cutler
47 Springfield Park
Haydock
St Helens
WA11 0XP

Thanking you
TJ Cutler (Mr)

Sent from [Mail](#) for Windows

R00428

[REDACTED]

From: Sarah Daniel [REDACTED]
Sent: 11 January 2022 18:52
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Good evening
I believe Brown field should be utilised instead of tearing up our Green Belt for inappropriate developments.
I support the comments made by RAFFD and GRAG.

Regards
Sarah Daniel
8 The Fairways
Ashton Cross
Ashton in Makerfield
Wigan
WN4 0YX
[REDACTED]

Get [Outlook for iOS](#)

R00429

[REDACTED]

From: Paul Daniel <[REDACTED]>
Sent: 13 January 2022 10:15
To: planningpolicy@sthelens.gov.uk
Subject: Planning

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Good Morning

I believe Brown field sites should be utilised instead of tearing up our Green belt for inappropriate developments. I support the comments made by RAFFD and GRAG.

Regards

Paul Daniel
8 The fairways
Ashton cross
Ashton in makerfield
Wigan
WN4 0YX
[REDACTED]

RO0447

[REDACTED]

From: [REDACTED]
Sent: 10 January 2022 18:34
To: planningpolicy@sthelens.gov.uk
Subject: Main Modification Consultation

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

I am writing to agree with and endorse the issues raised in the commissioned expert report written on behalf of the St Helens Green Belt Association with regards to the unnecessary building on Green Belt land as there is sufficient Brownfield land to meet the recognised needs.
Regards Keith Dawson 44 Hawthorn Drive, Eccleston St. Helens WA105EF Sent from my iPa

R00454

From: Michelle Dennett [REDACTED]
Sent: 06 January 2022 09:54
To: planningpolicy@sthelens.gov.uk
Subject: Green Belt Main Modification Consultation
Attachments: SHGBA MM Response Jan22.docx

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

St Helens Green Belt Association have commissioned an expert report which I attach for your reference.

I support and agree with the contents of the report and endorse the issues raised on behalf of the SHGBA.

My name is Michelle Dennett
And I live at WA10 5DU

Many Thanks,

Michelle Dennett

ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA

(December 2021)

St Helens Local Plan Main Modifications – Response of SHGBA

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
MM001	<p>“St Helens Borough Local Plan 2020-20375”</p> <p><i>Change all references to 2035 throughout the Plan to 2037 to reflect the extended Plan period, and update any associated requirement figures and supply information (including for employment and housing), where necessary.</i></p>	Support
MM002	<p>“1.9.1 In accordance with national planning legislation, the Local Plan will be subject to regular monitoring and will be reviewed at least once every no more than 5 years after its date of adoption to assess whether it needs updating, and action taken to update the Plan if considered necessary. This will ensure that planning policies in St Helens Borough remain responsive to the development needs of the Borough.”</p>	Support
MM003	<p>“2.9.2 Despite the urban character of much of the St. Helens Borough, over half of its area is rural or semi-rural in nature, and 7% of it constitutes open green spaces within the urban areas. The Borough benefits from an extensive network of open countryside and green spaces, much of which is accessible to local residents providing opportunities for formal and informal recreation, and improved health and quality of life. Certain spaces provide valuable nature conservation habitats, including, for example, 120 designated Local Wildlife Sites. Open spaces also play a role in helping to manage flood risk, including in the Sankey Catchment that covers much of the Borough. In addition, open spaces provide opportunities to mitigate and adapt to the impacts of climate change. Therefore, this plan will support the Council’s Climate Change Emergency declaration.”</p>	Support
MM004	<p><i>Insert new paragraphs 3.3.2 and 3.3.3 as follows:</i></p> <p>“3.3.2 The plan proposes to review the following Supplementary Planning Documents (SPDs) that are used by the Council:</p> <ul style="list-style-type: none"> • Ensuring a Choice of Travel • Hot Food Takeaways • Affordable Housing 	Support

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<ul style="list-style-type: none"> • New Residential Development • Householder Development • Telecommunications • Nature Conservation <p>3.3.3 This Plan also proposes to produce new Supplementary Planning Documents to support the implementation of policies:</p> <ul style="list-style-type: none"> • Developer Contributions • Open space provision and enhancement • Houses in Multiple Occupation (HMOs) 	
MM005	Entire 'Policy LPA01: Presumption in Favour of Sustainable Development' to be deleted along with accompanying Reasoned Justification (and associated re-numbering of subsequent policies in the Plan)	Support
MM006	<p>3. The re-use of suitable previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites. This will be encouraged through the use of Policies LPA08 and LPC02 to support the delivery of sites, particularly those on Previously Developed Land, by, for example, setting lower thresholds for developer contributions on previously developed sites to reflect the higher costs and lower sales values typically associated with redeveloping such sites, where appropriate.</p> <p>Addition of new section 4 into policy: 4. Comprehensive regeneration of the wider Borough will be delivered by the English Cities Fund Regeneration Partnership, through the provision of quality housing, new commercial activity, upgraded infrastructure and the overall improvement of the social and economic viability of the Borough on a phased basis.</p>	<p>Section 3. Object. The word “suitable” is imprecise and should be replaced by “as much previously developed land as possible” – this brings section 3 into line with NPPF paragraph 119. The phrase “where appropriate” is imprecise and should be replaced with “where it can be demonstrated by the applicant that lower thresholds are necessary for the delivery of a site”.</p> <p>Support new section 4.</p> <p>No comment</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>Re-number existing criteria 4-10 to 5-11.</p> <p>4. 5. This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until up to 31 March 20375, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 20375. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following an update full review of this Plan. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances. Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual application basis.</p> <p>67. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough and beyond. Development that prejudices their development in accordance with Policies LPA04, and LPA10 and LPA12 will not be allowed.</p> <p>4.6.9 This will ensure that the changes to the Green Belt endure well beyond 20375, avoiding the need for another Green Belt review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs.</p>	<p>Section 5. Object We maintain our objection that Green Belt release and the identification of safeguarded land is not necessary. The word “review” should be reinstated, section 5 should then read “following a full review or update of this Plan”. This will bring section 5 into line with paragraph 140 of NPPF that reads “through the preparation or updating of plans” – both full review and update should and can be referenced to make the Plan consistent with national policy (NPPF, paragraph 35d).</p> <p>No comment.</p> <p>Support</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>4.6.10 The Council’s SHLAA indicates that there is capacity for substantial housing development on urban sites. However it also established that Green Belt release would be required to help meet identified housing needs over the Plan period. Likewise, there is a significant shortfall in the urban supply of employment land against the identified needs.</p> <p>4.6.11 In view of the NPPF advice that local authorities work jointly with neighbouring authorities to meet any development requirements that cannot be met within their own boundaries, it should be noted that whilst St Helens shares a housing market area with Halton and Warrington, both have identified shortages of urban land supply for housing. St Helens Borough shares a functional economic market area with Halton, Knowsley, Liverpool, Sefton, West Lancashire and Wirral, none of which have identified spare capacity for employment development which could help meet the needs of St Helens. Such is the shortage of employment and housing development land in the surrounding areas as a whole that several authorities (Knowsley, Sefton and West Lancashire Councils) have successfully undertaken local Green Belt Reviews to meet their own needs, with further authorities also undertaking them (collectively covering the whole of Greater Manchester, Halton, Warrington and Wirral). None of these reviews have identified surplus capacity to help meet development needs arising in St Helens.</p> <p>4.6.12 In addition, there are other reasons why it is not desirable for housing or employment development needs arising in St Helens to be met in other authorities. If a neighbouring authority were able to meet such needs, this would (due to the shortage of urban land supply identified in those areas) be through the release of Green Belt, ie. the prospective loss of Green Belt in St. Helens would simply be replaced by a similar loss of Green Belt elsewhere. This would also lead to a risk</p>	<p>Object We maintain our objection that Green Belt release and the identification of safeguarded land is not necessary.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>that residents would need to move out of the Borough, potentially resulting in the loss of economically active residents within local communities. Such an approach would also be unlikely to guarantee delivery of affordable or special housing needs for residents of St Helens. If demand for new employment was required to be met outside the Borough, it would tend to exacerbate net out-commuting. This would prejudice the achievement of sustainable patterns of travel and make it more difficult for residents of St Helens, some of whom are likely to be reliant on public transport to access employment.</p> <p>4.6.13 For all of these reasons, there are considered to be exceptional circumstances at the strategic level to justify the release of Green Belt land to meet identified development needs.</p> <p>Renumber subsequent paragraph to account for the new paragraphs</p> <p>4.6.10 4.6.14 The sites that have been removed from the Green Belt</p> <p>4.6.11 4.6.15 New employment development falling within use classes B1, B2 and B8 and for light industrial, offices and research and development uses will be primarily”</p> <p>4.6.15 4.6.19 ... Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>4.6.20 In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and</p>	<p>Support</p> <p>Support</p> <p>Support</p> <p>We note this is an incomplete phrasing from NPPF – that includes “any other harm <u>resulting from the proposal</u>”.</p> <p>No comments to make.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).</p> <p>4.6.21 The delivery of compensatory improvements will be supported by a number of policies within this Plan. For example, policies LPA09, LPC05-10 and LPC12 all have an environmental focus, which will support the delivery of Green Belt compensatory measures. Additionally, development management focussed policies, including LPD01-03 and LPD09 will support this.</p> <p>4.6.22 Beyond the policy framework in this Plan to support the delivery of Green Belt compensatory measures, as well as other development plan documents, such as the Bold Forest Park AAP, the Council will continue to build on project improvements delivered to date. Improvements include those at the strategic level, such as at Bold Forest Park, for example the expansion of tree cover and the delivery of improved recreational facilities. A further strategic level project is the Sankey Valley Corridor Nature Improvement Area (NIA), which is focussed on enhancing the aquatic environment as well as the surrounding natural environment within the catchment, and improvements in environmental management practices. Improvements in this location have included accessibility enhancements, including walking and cycling infrastructure and new signage, enabling increased access to the Green Belt for residents and visitors. It is expected that further improvements can be delivered at these two strategic projects as part of Green Belt compensatory measures.</p> <p>4.6.23 There are further sites around the Borough that could be improved as part of Green Belt compensatory measures including those which form part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA), comprising three sites in the north of the</p>	

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>Borough, near Rainford, one by Parr and one by Newton-le-Willows (see Appendix 9). In addition, there are many Local Wildlife Sites (LWS) in the Borough, which are identified on the Policies Map, and Appendix 8 of this Plan shows that there are several LWS in each ward of the Borough, with many of these wards having LWS in the Green Belt. There are also three Local Nature Reserves located within the Green Belt. Compensatory measures can also occur at non-designated sites within the Green Belt, for example, initiatives related to alleviating the effects of flooding events, such as those implemented previously in the settlement of King’s Moss. Therefore, there are clear opportunities for localised Green Belt compensatory measures to be delivered on such designated and non-designated sites across the entire Borough through the delivery of environmental improvements, in addition to the two identified strategic sites referred to above.</p> <p>4.6.17 4.6.25 ... Open spaces and landscaping, including those provided within development sites also provide opportunities to adapt to climate change by storing flood water, reducing urban heat islands, capturing carbon and improving air quality, and therefore support the Council’s Climate Change Emergency declaration. Whilst public funding support to create and manage open spaces ...”</p> <p>4.6.19 4.6.27 As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area. It is also pursuing opportunities to enhance town centres in the Borough, for example through the creation of the St. Helens Town Centre Strategy. In addition, the Council intends to work pro-actively with partner organisations where necessary to secure the suitable regeneration of other town, district and local centres and of existing housing and employment areas, particularly in less affluent areas. The Council will prepare Supplementary Planning Documents covering specific areas where this is considered necessary to help implement their regeneration.”</p>	<p>Support.</p> <p>Support</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>4.6.28 The Council has entered into a formal partnership agreement with the English Cities Fund as the Council’s preferred strategic partner to ensure the delivery of a Borough wide regeneration strategy, including economic regeneration and housing. The Council has recognised that a new approach to growing the economy of the Borough is required that seeks to work pro-actively with the private sector and establish a strategic partnership maximising the opportunities presented to deliver significant future growth in St. Helens and deliver key priorities including Town Centre regeneration, social wellbeing and providing appropriate infrastructure to support future development.</p> <p>4.6.29 Furthermore, as part of the ‘Town Deal’ initiative established by the Government in 2019, the Council has successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and culture for St. Helens Town Centre.</p> <p>4.6.30 The Council will prepare Supplementary Planning Documents covering specific areas to help implement regeneration where this is considered necessary.</p>	
MM007	<p>c) ensure the necessary infrastructure is provided to support business needs (see Policy LPA 08); and d) support the creation of and expansion of small businesses.; and e) support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.”</p>	Support

Main Modification Reference	Change (deleted text in strikethrough ; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>2. The Council will aim to deliver a minimum of 215.4 173.24 hectares of land for employment development between 1 April 202118 and 31 March 20375 to meet the needs of St Helens Borough.</p> <p>a) the land or building (or any part of it) is no longer suitable and economically viable for light industrial, offices and research and developmentB4, B2 or B8 uses in accordance with the ...</p> <p>Proposals for the re-use, re-configuration or re-development for B4 light industrial, offices and research and development, B2 or B8 uses of land or buildings used for B4 light industrial, offices and research and development, B2 or B8 uses (including where...</p> <p><u>“7. Proposals for Class E uses in locations outside a defined centre will be subject to a condition to prohibit town centre uses (as defined in the glossary of the NPPF), unless the requirements of Policy LPC04 are satisfied.</u></p> <p>78. The Council will support proposals to ...”</p> <p>Subsequent criteria will be renumbered accordingly.</p> <p>Remove sites 2EA, 3EA, 10EA and 11EA. Table 4.1 to be updated to reflect this. See Annex 9.</p> <p>For this site, appropriate uses will read: “light industrial, offices and research and development, B2, B8”</p> <p>“15 Sites 2EA and 6EA are subject to existing planning permissions for employment development.”</p>	<p>Updated position noted, but we maintain our original objection to the employment land supply figure and how it was calculated.</p> <p>Support.</p> <p>Support.</p> <p>No comment to make.</p> <p>Noted.</p> <p>Noted.</p> <p>No comment to make</p> <p>No comment to make.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>“16 The phrases B1, B2 and B8 in Policy LPA04 refer to use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended).”</p> <p>“4.12.2 The Local Plan’s vision still stands true as we plan for recovery from the COVID-19 pandemic: By 2037, 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. Key to this is a continued focus on the economy, so that St. Helens residents are able to access good quality jobs that raise their living standards, whilst also improving physical and mental health.</p> <p>4.12.3 It is anticipated that the English Cities Fund Regeneration Partnership and the Council’s successful Town Deal funding bid will also assist in the post COVID-19 economic recovery.”</p> <p>“4.12.42 The provision of new well-located ...” Subsequent re-numbering of Reasoned Justification paragraphs required.</p> <p>Table 4.2 “B1 (a) Office” “B1 (b) Research and Development” “B1 (c) Light Industry”</p> <p>“4.12.97 Based on the OAN identified in the ELNS Addendum Report up to 2037, the OAN requirement for 2012-20375 has been calculated as a minimum of 227.4 239ha as shown in Table 4.3. This figure has been calculated by projecting forward the historic 5.8ha per annum growth scenario for the 1997-2012 period (referred to in the ELNS Addendum Report) from the base date of 2012 to the end date of the Plan (20375), and then adding a 5 year buffer to the baseline OAN (to ensure adequate choice and flexibility) and the recommended allowance for SuperPort and Parkside SRFI of 65ha from the ELNS Addendum Report.”</p>	<p>No comment to make.</p> <p>Support.</p> <p>No comment to make.</p> <p>No comment to make.</p> <p>Object – based on our previous submissions relating to the employment land calculation.</p>

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	<p>Update to Table 4.3, Reasoned Justification Paragraph 4.12.8 (to be renumbered 4.12.10) and replacement Table 4.4.</p> <p>“4.12.119 The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 20375. This ...”</p> <p>4.12.113... The draft SHELMA also assesses the need for B4light industrial, offices and research and development, B2 and for smaller scale B8 development (of less than 9,000m²). Unlike those ...”</p> <p>“4.12.1214 ... Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling 215.4 173.24ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough’s needs for B4 light industrial, offices and research and development, B2 and small scale B8 uses and a substantial ...”</p> <p>4.12.1416 The total supply of allocated employment sites will (at 234.08 182.31ha – excluding site 1EA) slightly exceed the residual employment land requirement identified in Table 4.4. ...”</p> <p><u>“4.12.16 To ensure the development of the proposed employment allocations for the identified employment uses, the Council will require any applications for alternative uses to demonstrate that the site has been marketed for employment use on the open market for a minimum period of 18 months. Only after this period, and subject to no interest being received for the identified employment uses, will an application for an alternative use be considered further. This applies to site allocations within the Plan, as well as those sites contributing to meeting identified employment needs over the Plan Period, including</u></p>	<p>Support extension of plan period, see previous comments on employment land calculation.</p> <p>Noted.</p> <p>Support.</p> <p>See previous comments on employment land calculation.</p> <p>See previous comments on employment land calculation.</p> <p>Support.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p><u>but not limited to land at Florida Farm North, Land north of Penny Lane, Land at Lea Green Farm West and Gerards Park, College Street.”</u></p> <p>“4.12.4720 Alternative uses may also be appropriate where there is no current or likely future market demand for employment uses on the site and / or its reuse for such purposes would not be viable currently or in the long term. The Local Economy Supplementary Planning Document (2013) outlines the evidence applicants will be required to provide in relation to the marketing and viability of employment sites before their loss for other uses can be supported. <u>This outlines the requirement for existing employment sites to carry out a minimum of 12 months marketing for employment uses in order to identify that the site is not viable in the long-term.”</u></p> <p>“Green Belt Exceptional circumstances</p> <p><u>4.12.22 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></p> <p><u>1EA – Omega South Western Extension, Land north of Finches Plantation, Bold</u></p> <p><u>4.12.23 The Green Belt Review (2018) found the sub-parcel reflecting this site to make a ‘medium’ contribution to the Green Belt purposes as whilst the site contains no inappropriate development and has open views across it, it is bordered by large scale built development at Omega South and the M62, and therefore only has a moderate countryside character. The Review also found the site to have ‘medium’ development potential.</u></p>	<p>Support</p> <p>No comment to make.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p><u>4.12.24 The site is adjacent to the Borough’s boundary with Warrington Borough, and its development would form a natural extension of the adjacent Omega employment site. This is particularly important in relation to the exceptional circumstances in the context of this site being allocated to help meet Warrington’s employment needs.</u></p> <p><u>4.12.25 The site is within 1km of an area within the 20% most deprived population in the UK, so its development for employment uses would help to reduce poverty and social exclusion. Further, the development of this site, provides the opportunity to improve sustainable transport links between St Helens and this site, as well as the wider Omega employment site, improving access to jobs in this location for residents of St Helens.</u></p> <p><u>4EA – Land south of Penny Lane, Haydock</u></p> <p><u>4.12.26 This site forms a relatively small part of a larger parcel of land that the Green Belt Review (2018) found to make a ‘medium’ contribution to the purposes of the Green Belt, with ‘good’ development potential. It should be noted that the parcel of land assessed in the Green Belt Review included the land to both the north and south of Penny Lane. In this context, a significant part of the assessed Green Belt parcel (11.05ha) has an extant planning permission for employment development, of which the majority has now been developed. This is the land to the north of Penny Lane. The site forms a natural extension to the Haydock Industrial Estate. Indeed, given the development of land to the north of Penny Lane, this site is now surrounded by built development of the Haydock Industrial Estate to the north, east and south, and the M6 to the west. The site is also located in close proximity to an area that falls within the 20% most deprived population in the UK. Therefore, its development for employment use would help to reduce poverty and social exclusion.</u></p>	

Main Modification Reference	Change (deleted text in strikethrough ; <u>new text underlined and bold</u> ; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p><u>The development would also reduce the need to travel by making best use of existing transport infrastructure due to its location close to a high frequency bus service.</u></p> <p><u>5EA – Land to the West of Haydock Industrial Estate, Haydock</u> <u>4.12.27 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a ‘medium’ contribution to the Green Belt purposes. The site adjoins the large built up area of Haydock, but is relatively well contained and strategic gaps between Haydock and elsewhere could still be maintained following the release of this site from the Green Belt. The Review also found the site to have ‘good’ development potential. The removal of this site from the Green Belt in conjunction with site 6EA, and the now developed employment land at Florida Farm North presents the opportunity to provide a stronger, more robust boundary in this location. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion and help reduce the need to travel through making best use of existing transport infrastructure due to its location close to a high frequency bus service.</u></p> <p><u>6EA – Land West of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock</u></p> <p><u>4.12.28 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a ‘medium’ contribution to the Green Belt purposes. At the time the Green Belt Review was undertaken, this site did not adjoin a large built-up area, but was considered in part to prevent ribbon development along Liverpool Road. Since that time, employment development at Florida Farm North has taken place adjacent the southern boundary of the site. This site would form a natural extension to the Haydock Industrial Estate, and its development</u></p>	

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	<p><u>would provide a stronger, more robust Green Belt boundary. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion</u></p> <p><u>7EA – Parkside East, Newton-le-Willows</u></p> <p><u>4.12.29 The Green Belt Review (2018) found this site to make a ‘high+’ contribution to the Green Belt purposes due to its significant size, lack of enclosure to the east and strong countryside character with little inappropriate development. On this basis, the site would not ordinarily have progressed to further assessment. However, the Review acknowledged that the site forms part of the wider Parkside site, straddling the M6, for which there has been a long history of developer interest, including a planning application for a Strategic Rail Freight Interchange (SRFI), the area being highlighted as a potential location for an inter-modal freight terminal in the previous North West RSS and the Core Strategy (2012) identifying the site as a strategic location for a SRFI. Furthermore, the evidence in the Parkside Logistics and Rail Freight Interchange Study (August 2016) found the site to be of regional and national significance in relation to regional and national policy, market demand and the need to deliver new and improved SRFIs, with the site’s opportunity for rail access to be second to none in the North West.</u></p> <p><u>4.12.30 This site has excellent locational advantages in relation to the delivery of an SRFI, including accessibility by rail with north-south and east-west routes immediately adjacent, as well as proximity to the M6, Junction 22. The evidence also indicates that the site is of a sufficiently large scale and layout to provide the necessary operational requirements of a SRFI. The development of a SRFI on this site would support the Government’s policy to move freight from road to rail.</u></p>	

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	<p><u>4.12.31 Therefore, whilst development of this site could have a high impact on the Green Belt, there are exceptional circumstances justifying its release from the Green Belt for development as a SRFI and the site is considered to have ‘good’ development potential.</u></p> <p><u>8EA – Parkside West, Newton-le-Willows</u></p> <p><u>4.12.32 The Green Belt Review (2018) found the parcel of land reflecting this site boundary to make a ‘medium’ overall contribution to the Green Belt purposes, influenced by the relatively high degree of enclosure, brownfield status of part of the site (former colliery and associated uses) and because it does not have a strong sense of openness or countryside character. It also found the site to have ‘good’ development potential. It’s scale and location, particularly in relation to the transport network, makes it ideal for employment uses to meet the identified employment needs. It will also support the delivery of the SRFI on Parkside East (site 7EA).</u></p> <p><u>4.12.33 The site is located within 1km of an area within the 20% most deprived population in the UK, so not only will development of the site bring wider economic benefits, it will also help to reduce poverty and social exclusion, and due to its public transport links, would help to reduce the need to travel by car.</u></p> <p><u>4.12.34 The relevance of paragraph 138 of the NPPF should also be noted given the importance of giving “first consideration to land which has been previously developed and / or is well-served by public transport” when a conclusion has been reached that it is necessary to release Green Belt land for development. The exceptional circumstances for removing land from the Green Belt to meet identified development needs is set out in the Reasoned Justification to Policy</u></p>	

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	<u>LPA02, and given the brownfield nature of much of this site, and for the other reasons set out, there are exceptional circumstances justifying the removal of this site from the Green Belt.</u>	
MM008	<ul style="list-style-type: none"> • “1EA: Omega South Western, Land north of Finches Plantation, Bold; • 2EA: Land at Florida Florida Farm North, Slag Lane, Haydock²² • 6EA: Land west of ...” <p>Delete footnote 22</p> <p>“5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA, and 6EA, 2EA and 8EA) and Policies by LPA10 and <u>LPA12</u> (in the case of sites 7EA and 8EA).”</p>	No comment to make.
MM009	<p>“1. In the period from 1 April 2016 to 31 March 20375 a minimum of 9,234 10,206 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.”</p> <p>“a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St. Helens or Earlestown Town Centres; and</p> <p>b) at least 30 dph on all sites outside St. Helens and Earlestown town centres. that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and</p> <p>c) at least 30 dph on other sites that are within an existing urban area. 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 the area.”</p> <p>“b) If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, taking into account the</p>	<p>Support extended plan period, see previous submissions on housing requirement calculation.</p> <p>Support.</p> <p>The text should be amended to take into account that monitoring could also show a</p>

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	<p><u>requirements in relation to housing delivery set out in national policy</u>, a partial or full plan review update will be considered to bring forward additional sites.”</p> <p>Updated version of Table 4.5 provided in Annex 8 to replace Table 4.5 in the LPSD, to remove site 3HA as an allocation and update other sites to reflect the latest housing trajectory.</p> <p>“24 The NDA (net developable area) for each site is an estimate of the area available to accommodate new housing once an allowance, typically 725%, has been made for features that are not included when calculating density e.g., areas performing a function for the wider area and not just the development , such as significant new landscaping buffers, potential new schools, areas of strategic open space and roads to serve the wider area. <u>Therefore, most sites will have a NDA of 75%.</u>”</p> <p>“4.18.1 ... The requirement of 9,234 10,206 dwellings per annum set out in Policy LPA05 is designed to meet the full Objectively Assessed”</p>	<p>position of over-supply, as well as one of under-supply. Proposed amendment: “If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level <u>or there is a position of over-supply, taking into account the requirements in relation to housing delivery set out in national policy</u>, a partial or full plan review update will be considered, <u>in the first instance</u>, to bring forward additional sites, <u>or in the second instance, to ensure safeguarded and Green Belt land continues to be protected.</u>”</p> <p>Noted.</p> <p>Support.</p> <p>Support extended plan period, see previous submissions on housing requirement calculation.</p>

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	<p>“4.18.4 ... Application of the national standard method using this approach would generate a housing need of 468 424 new dwellings per annum27.</p> <p>Changes to Footnote 27.</p> <p>“4.18.10 ... The St. Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 (as updated with the latest information as at 1 April 2021) identifies that sites in the urban area (as at 1 Apr 2017) had a total capacity of 7,817 6,114 dwellings. This figure includes sites with planning permission, sites under construction, other sites identified as suitable for housing and an allowance of 93 units per annum from small windfall sites of less than 0.25ha (based upon past delivery rates). The largest SHLAA sites are allocated as sites 3HA, 9HA and 10HA in Policy LPA05.”</p> <p>“4.18.12 ... In total, the allocated brownfield sites (3HA, 6HA, 9HA and 10HA) have an estimated capacity of 2,029 1,611 dwellings in the Plan period. The location of sites that have been released from the Green Belt has been determined by the St. Helens Green Belt Review. In total, the former Green Belt sites (1HA, 2HA, 4HA, 5HA, 7HA, and 8HA) have an estimated capacity of 2,056 2,114 dwellings in the Plan period.”</p> <p>“4.18.14 The density of development on each allocated site should be at or above the minimum figures given in Table 4.5. The stated capacities of each site listed in the table are indicative, and do not represent either maximum or minimum figures reflecting the minimum densities and anticipated net developable areas set out. The actual capacity will also be determined having regard to the acceptability of specific proposals in relation to relevant national and local policies.”</p> <p>Replace LPSD Table 4.6 with Tables 5.2 - 5.5 provided in Annex 3.</p>	<p>Support, see our previous submissions on the use of the standard method housing need figure. Our position remains unchanged.</p> <p>Changes to Footnote 27 noted.</p> <p>Support.</p> <p>See previous submissions on the need for Green Belt land release.</p> <p>Support.</p> <p>Support.</p>

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	<p>Remove Footnotes 29-33 in their entirety.</p> <p>“4.18.19 ... It is assumed that the majority of housing on most sites allocated in Policy LPA05 will be developed in their entirety within the Plan period. ...”</p> <p>Replace LPSD Table 4.7 and Figure 4.3 in the Plan with the table and trajectory provided in Annex 11.</p> <p>“4.18.21 ... the Council may undertake a Local Plan update review to bring forward additional sites such as those ...”</p> <p>Add the 5 year housing land supply tables in Annex 4 to the end of the Reasoned Justification of Policy LPA05 under a new sub-heading ‘Five year housing land supply’, along with the following text:</p> <p><u>“Five year housing land supply</u></p> <p><u>4.18.22 The following tables provide the current housing land supply position, and set out the key assumptions and parameters used to calculate it.”</u></p> <p>[then insert tables in Annex 4]</p> <p><u>Following on from the end of the Reasoned Justification new paragraph 4.18.22 on five year housing land supply, the following text is to be added</u></p> <p><u>“Green Belt Exceptional circumstances</u></p> <p><u>4.18.23 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances</u></p>	<p>Support.</p> <p>Support.</p> <p>Support.</p> <p>Noted.</p> <p>Support</p> <p>Object, see our previous submissions on housing requirement and Green Belt.</p>

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	<p><u>strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></p> <p><u>1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood</u></p> <p><u>4.18.24 The Green Belt Review (2018) found the parcel of land corresponding to this site to make a ‘low’ overall contribution to the Green Belt purposes. In summary, all sides of the site have strong boundaries, and it is therefore well contained. The strategic gap between Billinge and Garswood could also be maintained notwithstanding the release of this site from the Green Belt. It also found the site to have ‘good’ development potential. The site is in a sustainable location within walking distance of a local shop and public transport links, including the nearby railway station. Safe access to the site can be provided, and a suitable sustainable drainage scheme also. Indeed, development of this site could help solve flooding issues in the surrounding urban area. The Sustainability Appraisal (SA) found development of the site would result in a high number of positive effects.</u></p> <p><u>2HA – Land at Florida Farm (South of A580), Slag Lane, Blackbrook</u></p> <p><u>4.18.25 The Green Belt Review (2018) found the parcel of land generally reflecting this site to make a ‘low’ overall contribution to the Green Belt purposes, with strong permanent boundaries and not having a sense of openness or countryside character. In summary, there is existing residential development on three sides of the site, and the East Lancashire Road (A580) on the fourth side. It also found the site to have ‘good’ development potential. The site is in a sustainable location with good levels of accessibility to key services and jobs (including at the Haydock Industrial Estate). The site presents no technical constraints</u></p>	

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	<p><u>that cannot be satisfactorily addressed. Indeed, the provision of flood mitigation measures for the site could have the beneficial effect of helping alleviate flooding in the wider area. The SA found development of the site would have a mixed impact on achieving SA objectives, with a high number of positive effects, including good access to public transport and employment opportunities.</u></p> <p><u>4HA – Land bounded by Reginald Road / Bold Road / Travers Entry / Gorsey Lane / Crawford Street, Bold (Bold Forest Garden Suburb)</u></p> <p><u>4.18.26 The Green Belt Review (2018) found the parcels of land that form this site make a ‘low’ to ‘medium’ contribution to the purposes of the Green Belt, with ‘good’ development potential. The land on which the site is located forms a notable indent in the alignment of the southern edge of the built up area of St Helens. Whilst there are open views across the parcel, it has strong, robust physical boundaries including existing development to the north, east and west, and Gorsey Lane to the south. The site has good levels of accessibility to jobs in nearby industrial areas, and to public transport services, including via St Helens Junction railway station.</u></p> <p><u>4.18.27 The site would be sufficiently large to include new social infrastructure (ie. a new primary school, local retail centre and potentially health facilities). It is a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough, and incorporate and deliver the framework and philosophies of the Bold Forest Park Area Action Plan. There are no technical constraints to development of this site that cannot be satisfactorily addressed. Due to its scale and location, development of this site would contribute strongly towards meeting the strategic aims and objectives of the Local Plan.</u></p>	

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	<p><u>5HA – Land South of Gartons Lane and former St. Theresa’s Social Club, Gartons Lane, Bold</u></p> <p><u>4.18.28 The Green Belt Review (2018) found the parcel of land generally corresponding to this site boundary to make a ‘low’ overall contribution to the purposes of the Green Belt, benefitting from a high degree of visual enclosure with strong, robust boundaries. The Review also found the site to have ‘good’ development potential. The site is in a sustainable location with good transport links, including safe, convenient access by foot to the nearest local centre, bus stops and a railway station. It would form a natural expansion of the surrounding settlement and help deliver a range of housing in a relatively deprived area. Development of the site also provides the opportunity to facilitate improvements in line with the Bold Forest Park Area Action Plan. The SA found development of the site would have a mixed impact on the achievement of SA objectives, with a high number of positive effects.</u></p> <p><u>7HA – Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows</u></p> <p><u>4.18.29 The Green Belt Review (2018) found the parcel of land containing this site to make a ‘low’ overall contribution to the purposes of the Green Belt, given its strong boundaries, high level of enclosure and the brownfield nature of much of the site. It does not have a strong sense of openness or countryside character. The Review also considered the site to have ‘good’ development potential. The site is in a sustainable location within a convenient walking distance of a local centre, various employment areas (existing and planned), a railway station and other public transport facilities. There are no technical constraints on the site that cannot be satisfactorily addressed. The SA concluded that development of the site would result in a high number of positive effects. This site is of particular significance given its</u></p>	

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	<p><u>brownfield nature, and the importance of making effective use of such land, where appropriate.</u></p> <p><u>8HA – Land South of Higher Lane and East of Rookery Lane, Rainford 4.18.30 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a ‘low’ overall contribution to the Green Belt purposes given its limited role in preventing sprawl and the merging of settlements. It also has strong boundaries and a high degree of visual containment. The Review found the site to have ‘good’ development potential. The site is sustainable, with good access to public transport, the local highway network and employment areas. There are no technical constraints that cannot be satisfactorily addressed. The SA found that development of the site will have a mixed impact on the achievement of SA objectives, with a high number of positive impacts. The location of the site also aligns with the Plan’s spatial strategy as Rainford is identified as a Key Settlement.”</u></p>	<p>Object, see our previous submissions on this site.</p>
<p>MM010</p>	<p>“1. The following sites allocated under Policy LPA0535 shall constitute Strategic Housing Sites:</p> <ul style="list-style-type: none"> • 2HA: Land at Florida Farm (South of A580), Slag Lane, Blackbrook • 3HA: Former Penlake Industrial Estate, Reginald Road, Bold • 4HA: Land bounded by Reginald Road / Bold Road / Travers Entry / Gorse Lane / Crawford Street, Bold (Bold Forest Garden Suburb)” <p>Footnote 35 Within the list of Strategic Housing Sites, sites 3HA, 9HA, and 10HA are subject to ...”</p> <p>“f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways <u>(including any proposed new greenways as referred to in</u></p>	<p>Support.</p> <p>Noted.</p>

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	<p><u>policy LPC07</u>), ecological network, landscape character, trees, woodlands and water storage in a holistic and integrated way.”</p> <p>“The masterplans for each Strategic Housing Site, and any planning application for development within any other allocated housing site, must address the indicative requirements set out in Appendix <u>5 (in the case of sites 2HA, 5HA, 6HA, 9HA and 10HA) and Policy LPA13 (in the case of site 4HA).</u>”</p>	<p>Whilst the suggested MM is reasonable our site-specific objections remain unchanged.</p>
<p>MM011</p>	<p>“1. The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond the this Plan period. Such Safeguarded Land is not allocated for development in the this Plan period. The future uses that the sites are safeguarded for are listed in Tables 4.7 and 4.8.</p> <p>2. Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review update (full or partial) that proposes such development <u>based on the evidence showing a need for this.</u> Accordingly <u>Otherwise,</u> proposals for housing and employment development of safeguarded sites in the this Plan period will be refused.</p> <p>Updated version of Table 4.8 provided in Annex 12 to replace Table 4.8 in the LPSD, to reflect the increased site area and indicative capacity of site 4HS following on from the site boundary change.</p> <p>“4.24.1 In accordance with Policy LPA02, the sites listed in Tables 4.7 and 4.8 have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 20357. Their purpose is to ensure that the new</p>	<p>MM supported, subject to our previous objections not finding favour.</p> <p>MM supported, subject to our previous objections not finding favour.</p> <p>Noted.</p> <p>Support for extended plan period.</p>

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	<p>Green Belt boundaries set by this Plan can endure well beyond 20357<u>7</u>. The reasons why specific sites are safeguarded rather than allocated for development before 20357<u>7</u> are set out in the St. Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8. This is to ensure that, potentially, they could be used for these purposes in the future.</p> <p>4.24.2 The development of the safeguarded sites for the purposes in Tables 4.7 and 4.8 will only be acceptable if a future Local Plan <u>update, either full or partial,</u> confirms that such development is both acceptable and required, <u>and proceeds to allocate such sites for development in that update. The Council may undertake and bring into effect such a Local Plan update within the current plan period of 2020-2037, should this be required and justified by the latest evidence.</u> This e-case for developing the sites is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity <u>and needs</u> and any other factors that may affect the delivery of the sites at that time.</p> <p>4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,739<u>644</u> dwellings. To this can be added the indicative post-2037<u>5</u> delivery of 2,995 <u>3,223</u> dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA and <u>10HA</u> (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 2037<u>5</u>. Further contributions are likely to be made from windfall sites and other sources after 2037<u>5</u>. It should also be noted that household growth rates in St. Helens Borough are currently projected to reduce in the years up to, and after, 2037<u>5</u>, meaning that it is likely that post-2037<u>5</u>, housing needs may be lower than between 2020 and 2037<u>5</u>.</p> <p><u>“Green Belt Exceptional circumstances</u></p>	<p>MM supported, subject to our previous objections not finding favour.</p> <p>Updated figures noted.</p> <p>See our previous submissions on Green Belt.</p>

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	<p><u>4.24.6 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis for safeguarding for development beyond the end of the plan period. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></p> <p><u>Employment safeguarded sites</u></p> <p><u>1ES – Omega North Western Extension, Bold</u></p> <p><u>4.24.7 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a ‘medium’ overall contribution to the Green Belt purposes as it contains no inappropriate development and has open views across the site, but it is bordered by large scale built development at Omega North and the M62 and therefore only has a moderate countryside character. It should be noted that this contrasts with the scoring of other Green Belt parcels in this area which were found to make a ‘high’ or ‘high+’ contribution to the Green Belt purposes.</u></p> <p><u>4.24.8 The site has potential to form a logical extension to the Omega employment site. However, there are current highway and accessibility constraints that would require mitigation, including the provision of access across land in separate ownership. Further, as Junction 8 of the M62 experiences congestion and capacity issues, the cumulative impacts of development of this site would need to be addressed in conjunction with Warrington Borough Council and Highways England. Due to the location of the site within 1km of an area of 20% of the most deprived population in the UK, development of this site would help to reduce poverty and social exclusion. This site therefore has clear</u></p>	

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	<p><u>potential to meet longer term employment needs, and by safeguarding it, there is time to address the highways and access issues noted.</u></p> <p><u>2ES – Land North East of Junction 23 M6 (South of Haydock racecourse), Haydock</u></p> <p><u>4.24.9 The Green Belt Review found the parcel of land generally reflecting this site boundary to make a ‘high’ overall contribution to the Green Belt purposes. Whilst ordinarily a site with such a score would not be considered further, there is a clear need to provide sufficient land for employment both within the plan period, and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site for longer term needs beyond the Plan period. Whilst there are clear harms in relation to the development of this site, including harm to Green Belt and adverse landscape impacts, it should also be noted that the site is located within 1km of an area with the 20% most deprived population in the UK, so development here in the longer term would help to reduce poverty and exclusion. Whilst the site did not score as well as the allocated employment sites through the Green Belt Review, the need to make provision for employment land beyond the Plan period forms the basis for the exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding.</u></p> <p><u>Housing safeguarded sites</u></p> <p><u>1HS – Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood</u></p> <p><u>4.24.10 The Green Belt Review (2018) found the sub-parcel of Green Belt land containing this site to make a ‘medium’ contribution to the</u></p>	

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	<p><u>Green Belt purposes and has a ‘medium’ development potential. The site is within walking distance of a local convenience shop and is readily accessible by bus and rail. There are not considered to be any technical constraints to delivering development on this site that cannot be satisfactorily addressed over the necessary timeframe. However, as the site projects further into the countryside than housing allocation 1HA, it is considered to be a less logical extension to the village within the Plan period. On that basis, site 1HA is allocated for development within the Plan period, and this site is safeguarded for development subsequent to that, beyond the end of the Plan period to meet longer term needs, creating a logical phased extension of the village both within and beyond the Plan period.</u></p> <p><u>2HS – Land between Vista Road and Belvedere Road, Earlestown</u></p> <p><u>4.24.11 The Green Belt Review (2018) found the sub-parcel of land that contains this site to make a ‘medium’ contribution overall to the Green Belt purposes, and also found the site to have ‘good’ development potential. The site proposed for safeguarding sits within a notable indentation in the existing urban edge and benefits from clearly defined boundaries. There are not considered to be any technical constraints that cannot be addressed satisfactorily to enable this site to meet development needs beyond the end of the Plan period.</u></p> <p><u>3HS – Former Eccleston Park Golf Club, Rainhill Road, Eccleston</u></p> <p><u>4.24.12 The Green Belt Review (2018) found the parcel of land that generally reflects the boundary of this site to make a ‘low’ overall contribution to the Green Belt purposes, due to its strong boundaries and because of the extent of urban development around its boundaries and its limited role in preventing the merging of settlements. However, the site is identified as being affected by a number of constraints that</u></p>	<p>Object – in addition to our previous submissions – the following response is made in relation to SHBC’s proposed MM: the “extent of urban development” (SHBC’s phrase) around the site’s boundaries is not an exceptional circumstance, nor an illustration of the site’s “limited role” in preventing the merging of settlements.</p>

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	<p><u>will have a significant impact on its net developable area and deliverability of development within it, including its use as a golf course, constraints in relation to the highway network and some physical constraints within the parcel itself, including electricity pylons, the proximity of the railway line in noise terms, woodland to the north of the parcel and some infrastructure assets running through the parcel as advised by United Utilities.</u></p> <p><u>4.24.13 Notwithstanding this, the site has good accessibility to a range of services, jobs and public transport (including Eccleston Park railway station). The safeguarding of this site is justified to help meet development needs beyond the Plan period, and will provide sufficient time to satisfactorily address the identified constraints, and exceptional circumstances are therefore justified.</u></p> <p><u>4HS – Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows</u></p> <p><u>4.24.14 The Green Belt Review (2018) found the parcel of land that contains this site to make a ‘low’ overall contribution to the purposes of the Green Belt and has ‘medium’ development potential. The site is in a sustainable location, within walking distance of a local convenience shop and public transport facilities. However, the highway network in the surrounding area has a number of constraints, and further work is required prior to development coming forward. Further, attenuation measures will be required to limit noise from the railway line running along the eastern site boundary. However, the site is considered able to contribute to potential development needs beyond the end of the Plan period, and by safeguarding the site, there is sufficient time for the above issues to be addressed.</u></p>	<p>Indeed, this description in the MM reinforces the point made in submissions, and during the hearing, that the Golf Club is the only and, therefore, key open land site in this area and as such is crucial in preventing the merging of settlements.</p> <p>We note this area’s significant range of constraints.</p>

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	<p><u>5HS – Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows</u></p> <p><u>4.24.15 The Green Belt Review (2018) found the sub-parcel of land within which this site sits to make a ‘low’ overall contribution to the Green Belt purposes and have ‘medium’ development potential. The site is within a sustainable location, close to a railway station. The site is affected by a number of constraints, which will require further investigation before development can be brought forward, including the difficulty of providing a secondary access to the site, the proximity to a Local Wildlife Site and a historic landfill site in close proximity to the site (to the south), and associated potential contamination issues. There is also a railway line to the east of the site, so noise attenuation measures would be required. The sub-parcel is considered suitable to help meet needs in the longer term beyond the Plan period, and the safeguarding of the site will enable the required further investigation in relation to the above constraints to make efficient use of land within the site.</u></p> <p><u>6HS – Land East of Chapel Lane and South of Walkers Lane, Sutton Manor</u></p> <p><u>4.24.16 The Green Belt Review (2018) found the sub-parcel of land that reflects this site to make a ‘low’ overall contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site has ‘medium’ development potential. The site does project notably outwards into the countryside from the current urban edge and is considered more suitable as a longer term extension of the urban area, contributing to meeting housing needs after the end of the Plan period. Other technical constraints on the site (such as the presence of</u></p>	

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	<p><u>protected woodland and a Local Wildlife Site) are considered able to be satisfactorily addressed.</u></p> <p><u>7HS – Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath</u></p> <p><u>4.24.17 The Green Belt Review (2018) found the sub-parcel that broadly reflects this site boundary to make a ‘low’ contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site was also considered to have ‘medium’ development potential. The site is sustainably located within walking distance of a local convenience shop and accessible by public transport users and the local highway network. As the surrounding area includes opportunities for redevelopment of previously developed sites, to ensure an appropriate phasing of development within the Thatto Heath area, it is appropriate to delay any development on this site until after the end of the Plan period. Therefore, it is safeguarded to meet development needs for the longer term.</u></p> <p><u>8HS – Land South of A580 between Houghtons Lane and Crantock Grove, Windle</u></p> <p><u>4.24.18 The Green Belt Review (2018) found the parcel of land that reflects this site boundary to make a ‘low’ overall contribution to the Green Belt, with a ‘medium’ development potential. The site comprises a significant greenfield site that forms a sizeable outward extension of the urban area into the countryside. The site also has a number of technical issues which would need to be addressed prior to development, including required significant improvements to highways infrastructure and suitable ecological evidence in relation to the potential of the site to provide functionally linked habitat for bird</u></p>	<p>See our previous submission on 7HS.</p> <p>SHBC’s exceptional circumstances argument is flawed. By acknowledging that this is a “significant greenfield site” and that the site “forms a sizeable outward extension of the urban area into the countryside” – SHBC’s “exceptional circumstances” case demonstrates that the site serves 3 of the 5 purposes of Green Belt:</p> <p>a) it checks the unrestricted sprawl of a large built-up area;</p>

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	<p><u>species, which may require a mitigation strategy. Such issues could take some time to address. Furthermore, given the scale of the site, some social infrastructure (such as a primary school) is likely to be required. There are further physical constraints in relation to the site, which could likely be addressed satisfactorily. On the basis of the above, this site provides the opportunity to meet longer term development needs, and safeguarding the site will provide sufficient time to address the identified issues.</u></p>	<p>c) it assists in safeguarding the countryside from encroachment; and e) it assists in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The MM wording demonstrates that the site makes a high, rather than low, overall contribution to the purposes of Green Belt.</p> <p>We note the “number of technical issues” associated with the site.</p>
<p>MM012</p>	<p>“1 ... a) Secure the delivery of new or improved road, <u>rail</u>, walking, cycling, and / or bus infrastructure where required;”</p> <p>“2. All proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement, <u>the scope of which must be agreed by the Council.</u>”</p> <p>“4. To minimise air and noise pollution and carbon emissions, non-residential forms of development that would generate a significant amount of transport movement by employees or visitors must be supported by suitably formulated Travel Plans. Conditions and/or legal agreements will be used to ensure that Travel Plans submitted in such cases are fully implemented and monitored.”</p> <p>“6. Direct access from new development on to the Strategic Road Network will only be permitted <u>as a last resort</u>, where agreed by Highways England</p>	<p>Support.</p> <p>Support.</p> <p>Support.</p> <p>Support.</p>

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	<p><u>and where the necessary levels of transport accessibility and safety could not be more suitably provided by other means.</u></p> <p>“Carbon Emissions and air quality</p> <p>4.27.2 Transport is a major source of carbon emissions that, in turn, area a major cause of climate change. Therefore, transport can play a key part in the development of a low carbon economy. Many of the priorities identified in this Policy will play an important part in helping to reduce carbon emissions resulting from transport, <u>and therefore supporting the Council’s Climate Change Emergency declaration.</u> Measures to reduce the need to travel, widen travel choice and reduce dependence on the private car, alongside investment in low-carbon vehicle technologies area an important part of helping to meet national climate change targets. Similarly they form an important part of the Council’s drive to tackle air quality issues, particularly (but not exclusively) within Air Quality Management Areas”</p> <p><u>“Proposed Major Road Network 4.27.9 As part of the Transport Investment Strategy published in 2017, the Government committed to creating a Major Road Network (MRN). Draft proposals were issued for consultation, outlining how a new MRN would help the Government deliver a number of objectives, including supporting housing delivery and economic growth. The creation of an MRN will allow for dedicated funding from the National Roads Fund to be used to improve this middle tier of the busiest and most economically important local authority ‘A’ roads. Parts of the A58 and A570, and the whole of the length of the A580 which falls in St Helens, have been proposed for inclusion in the MRN.</u></p> <p><u>Supporting Supplementary Planning Guidance</u> <u>4.27.109 A new Supplementary Planning Document”</u></p>	<p>Support.</p> <p>Noted.</p>

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MM013	<p>“2. Subject to compliance with relevant legislation and national policy, development proposals will be expected to include or contribute to the provision, improvement or replacement of infrastructure that is required to meet needs arising from the development proposal and / or to serve the needs of the wider area. This may include direct provision of on-site or off-site infrastructure and / or financial contributions that will be secured by: a) Section 106</p> <p>“5. When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development. In this context, consideration will be given to economic viability evidence including any site specific development appraisal that may have been submitted to determine the ability of the development scheme to support the required level of contributions. <u>In light of the viability evidence, where a developer can demonstrate that meeting all policy requirements would not be viable, a pragmatic approach will be taken to s106 contributions on sites within zone 1.</u>”</p> <p>“Hierarchy of Developer Contributions</p> <p>6. Decision makers will, as a general rule, apply the following hierarchy for developer contributions in cases where viability constraints can be demonstrated (with i) being the highest priority):</p> <p>i) contributions that are essential for public safety (for example essential highway works or flood risk mitigation) or to achieve a minimum acceptable level of design quality; ii) contributions that are necessary to provide affordable housing or to address a local infrastructure requirement or deficiency that would be caused or exacerbated by the development, <u>depending on site surroundings and</u></p>	<p>Amend as follows: “meet needs <u>and/or mitigate impacts</u> arising from the development proposal”</p> <p>Replace “will” in final line of MM with “may have to”</p> <p>Noted.</p>

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	<u>the level of existing infrastructure</u> , for example education needs or greenspace provision in areas of deficit; and iii) contributions that would not fall into categories i) or ii) as set out above.”	
MM014	<p>“1. Green Infrastructure in St Helens Borough comprises a network of multi-functional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside rural rural areas.”</p> <p>“4. ... Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused. The only exception to this will be where it has been demonstrated that:</p> <p>a) appropriate protection or retention of Green Infrastructure assets cannot be achieved <u>in the pursuit of wider planning objectives</u>;</p> <p>b) the development would bring benefits that would over-ride the resultant harm; and</p> <p>c) there are no realistic alternatives to the proposed development that would avoid such harm.</p> <p>In such cases, mitigation, <u>for example, in the form of incorporating the identified Green Infrastructure assets into the scheme design and layout through a masterplanning process to maintain the key Green Infrastructure assets and connections</u>, and / or as a last resort compensatory provision will be required.”</p> <p>“4.33.1 Policy LPA09 aims to protect, enhance and sustain the Borough’s natural assets and increase accessibility to them and connectivity between them, whilst protecting and enhancing landscape character, to ensure that the natural environment underpins the quality of life. The Green Infrastructure network in the Borough has a wide range of functions and values for recreation and tourism, air <u>quality (supporting the Council’s Climate Change Emergency declaration)</u>, public access, health, heritage,</p>	<p>Support.</p> <p>Amend MM to read “in the pursuit of wider Local Plan objectives”.</p> <p>Support.</p> <p>Support.</p>

St Helens Local Plan Main Modifications – Response of SHGBA

Main Modification Reference	Change (deleted text in strikethrough ; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>biodiversity, water management and landscape character; providing a sense of place ...”</p> <p>“4.33.2 The Green Infrastructure network includes, (in addition to urban greenspaces, trees, and water bodies etc.) the countryside around the towns, which accounts for around 50% of the Borough’s land area. This is predominantly productive farmland. The importance of countryside around the Borough’s more urban locations was recognised by the pilot study Countryside In and Around Towns undertaken with the Countryside Agency (now Natural England) in 2006. In implementing Policy LPA09 (in both urban and rural areas) the Council will seek to liaise closely with, and where necessary work in partnership with, landowners.”</p>	Noted.
MM015	Site 7EA	No comments.
MM016	<p>“The Council will work with its health and wellbeing partners to promote public health principles, maximise opportunities for people to lead healthy and active lifestyles, and reduce health inequalities for residents within the Borough. Planning decisions and processes will be used to <u>Through the planning system, the Council will seek to:</u></p> <ol style="list-style-type: none"> 1. encourage improved access ... “ 2. ensure the provision of easy-to-maintain, safe and attractive public areas and green spaces to serve new development that minimise the opportunity for and fear of crime and <u>anti-social behaviour</u> and that promote social cohesion and mental wellbeing; 	Support.
MM017	Parkside West	No comments.
MM018	New Policy LPA13: Bold Forest Garden	No comments.

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MM019	<p><u>“2. The English Cities Fund Regeneration Partnership will help deliver a comprehensive redevelopment of the Town Centre and Central Spatial Area, including new commercial activity, upgraded infrastructure, the provision of quality housing, and the overall improvement of the social and economic viability of the area.</u>”</p> <p>23. Proposals for retail and leisure development will be directed” Subsequent policy sections will be renumbered accordingly.</p> <p>“34. Proposals for the change of use of units in the Primary Retail Frontages Shopping Area in St Helens Town Centre will be refused unless they would be to a Class A145 retail use or another main town centre use or uses that would contribute positively to the overall vitality and viability of the centre. Development proposals within the Primary and Secondary Frontages that would not result in an active ground floor use with a window display frontage will be refused.”</p> <p>Delete footnote 45</p> <p>“5.3.1 The St. Helens Central Spatial Area (as shown in Appendix 11 <u>and on the Policies Map</u>) includes the Town Centre and its surrounding hinterland. This includes ...”</p> <p>“5.3.6 The Strategy set out a vision for the future of the town centre detailing thematic initiatives to deliver this. <u>In January 2020 the Council successfully received an initial £173,029 capacity fund as part of the Governments Town Deal initiative. The Council has now successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and</u></p>	Support.

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	<p><u>culture. A Town Investment Plan will be developed and will sit alongside the Town Centre Strategy.</u></p> <p>“5.3.8 The 'Area of Opportunity', referred to in the Strategy, has been identified due to the potential to reconfigure and / or redevelop land and premises close to Church Square and Chalon Way for suitable town centre uses. <u>To support this initiative and to assist in the regeneration of the area, the Council has entered into a regeneration partnership with the English Cities Fund to deliver a comprehensive redevelopment of the Town Centre (and wider Borough on a phased basis).</u>”</p> <p>“5.3.9 To guide the application of the policies concerning main town centre uses, a Primary Shopping Area and Primary and Secondary Retail Frontages have been identified in line with the definitions in the NPPF (see Appendix 11).”</p> <p>Re-numbering of subsequent Reasoned Justification paragraphs to be done.</p> <p>“5.3.10 <u>5.3.409</u> The first preference for the location of new retail <u>Class E and Sui Generis retail main town centre uses</u> development is within the Primary Shopping Area. Proposals for retail <u>Class E and Sui Generis retail main town</u> uses...</p> <p>“5.3.13 The Primary Retail Frontages are areas where there should be a particular focus on retail uses. This is because such uses are a key driver of footfall and help to draw shoppers into the centre. Proposals for non-retail uses in these frontages will be resisted unless their approval would be consistent with the aim of maintaining and enhancing the overall functionality, vitality and viability of the town centre. Specific considerations to be taken into account when assessing such proposals in the Primary Retail Frontage include the existing proportion of retail uses, the nature of the proposed use and the location of the unit affected within the Primary Retail Frontage.</p>	

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	<p>5.3.14 The Secondary Frontages will provide greater opportunities for a diversity of uses such as restaurants, cinemas and non-retail business uses such as banks, estate agents and other services. The Council will resist proposals within the primary or secondary frontages that would result in the loss of an active ground floor use with open display windows.”</p> <p>Re-numbering of subsequent Reasoned Justification paragraphs to be done.</p>	
MM020	<p>“4. The delivery and implementation of a Council-led strategy to provide a framework for the future regeneration and development of the town centre will be supported. <u>The English Cities Fund Regeneration Partnership will help deliver a mix of residential, leisure, business and retail development all centred around the Town Centre.</u>”</p> <p>“5.6.3 The Council will seek to safeguard <u>and build upon</u> this important role and function by applying the 'town centre first' approach to ensure that Earlestown remains the Borough's second centre providing a highly sustainable location for retail and other services. <u>Through its partnership with the English Cities Fund the Council will work towards creating a mix of residential, leisure, business and retail development all centred around the Town Centre.</u>”</p> <p>“5.6.8 To provide a focus for future development of the town centre and positively promote Earlestown as a location to live, <u>through the English Cities Fund Regeneration Partnership</u>, the Council and its partners intend to bring forward a dedicated Town Centre strategy, ………”</p>	Support.
MM021	<p>“1. New market and affordable housing must <u>should</u> be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by <u>up-to-date</u>, relevant evidence including the <u>Borough’s latest Strategic Housing Market Assessment (SHMA).</u>”</p>	Object. The MM is not consistent with the NPPF, paragraph 134 of which states “Development that is not well designed should be refused”. The use of the word

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	<p>"2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:</p> <p>a) At least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2)<u>a</u>; and</p> <p>b) At least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" adaptable dwellings standard set out in Part M4(3).</p> <p>"3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows. Exceptions to paragraphs 1 to 3 of this Policy may be made where the applicant"</p> <p>"5<u>4</u>. The Council will work with partners to facilitate the provision of <u>bungalows, and</u> specialist and supported housing for elderly and vulnerable</p>	<p>"should" implies there may be instances where development may not be well designed. We would suggest the following amendment:</p> <p><u>"Well designed N</u>new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA) <u>will be supported</u>. <u>Development that is not well designed will not be acceptable.</u></p> <p>No comment to make.</p> <p>Support.</p>

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	<p>people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible</p> <p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (20372035). Of the overall housing provision of 10,206 9,234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,457 223 (24%) should be affordable. The amount of”</p> <p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2)a of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ adaptable dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. <u>A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.</u>”</p>	<p>Support.</p> <p>Support.</p>
MM022	<p>“2. Proposals for new open market housing developments of 11 10 units or more, <u>or when the number of units is not known, sites of 0.5ha or more,</u> will be required to.....”</p> <p>“6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <u>Furthermore, it is acknowledged that ‘First Homes’ have been introduced by the Government, and fall within the definition of ‘affordable housing’.</u></p>	Support.

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	<u>However, as this Plan is being progressed under the First Homes transitional arrangements, it is not required to reflect the First Homes policy requirement. Instead, this will be addressed in a future update of the Plan.</u>	
MM023	Gypsy and Travellers	No comments to make.
MM024	<u>“2. The development of main town centre uses within the defined centres will be supported. Proposals for other uses in such locations will be considered having regard to the scale and nature of the proposal and the role and function of the centre.</u> Planning permission will only be granted for development that is appropriate in terms of its scale and nature relative to the role and function of each centre.”	Support.
MM025	<p>“Open space fulfils a variety of important functions of value to the public. For example, it provides opportunities for: formal and informal recreation and activities; play and social interaction; environmental enhancement and attractiveness; wildlife conservation; education; food growing; and quiet contemplation. It provides strong health and well-being benefits for local people. <u>Furthermore, provision of new and / or enhancement of existing open spaces will support the Council’s Climate Change Emergency declaration.</u>”</p> <p>“7.3.11 Where new residential development would result in a deficiency of open space or sports and recreation facilities in the locality, or be in a location where a deficiency already exists, it will be expected to include new, expanded or enhanced open space provision in accordance with Policy LPD03 (Open Space and Residential Development). Any requirement for new sports facilities will be additional to this. <u>Further, even where there is considered to be sufficient open space in quantitative terms, larger residential developments may be expected to provide certain types of open space (such as play areas for children and young people and</u></p>	<p>Support.</p> <p>Support.</p>

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	<p><u>amenity green space) to provide local recreational opportunities and visual relief as part of an attractive and well designed development.”</u></p> <p>Remove paragraphs 7.3.11 and 7.3.12 (inclusive of Table 7.1) from the reasoned justification for Policy LPC05, and add into the reasoned justification for Policy LPD03, and adjust paragraph numbering in both Reasoned Justification sections accordingly. Table 7.1 will also need to be renamed Table 8.1 to follow the table numbering convention, and references to this table updated in the ‘List of Tables’ (page 2) and within the policy text of LPC05 and LPD03.</p>	
MM026	<p>“1. In accordance with NPPF Paragraph 175, the Council is committed to ensuring the protection and enhancement of St Helen’s biodiversity and geological asset and interests. In order to do this, the Council will have regard to the following hierarchy of nature Conservation sites when making planning decisions, according to their designation as follows:</p> <ul style="list-style-type: none"> –International and European Sites –Sites of Special Scientific Interest –Local Wildlife Sites –Local Nature reserves –Local Geological Sites –Priority Habitat(s) –Impact on Legal Protected Species and/or priority Species <p>The following hierarchy of sites and habitats are found in the Borough:</p> <p>i) International</p> <ul style="list-style-type: none"> • Functionally Linked Land (FLL) for sites of international nature importance (European Sites) including the Ribble and Alt Estuaries Special Protection Area (SPA), Martin Mere SPA, the Mersey Estuary SPA, Liverpool Bay SPA. <p>ii) National • Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest, Stanley Bank Meadow and Highfield Moss</p>	Support.

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	<p>iii) Local</p> <ul style="list-style-type: none"> • Sites of local nature and geological importance, which in St.Helens Borough include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs) <p>In addition, priority habitats and species, and legally protected species.</p> <ul style="list-style-type: none"> • Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest, Stanley Bank Meadow and Highfield Moss <p>iii) Local</p> <ul style="list-style-type: none"> • Sites of local nature and geological importance, which in St.Helens Borough include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs) <p>In addition, priority habitats and species, and legally protected species.</p> <p>European Sites</p> <p>1. 2. Development that is likely to have a significant effect (either alone or in combination with other plans or projects) on one or more internationally important site(s), including any areas of supporting habitat that are functionally linked to the site(s), must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided, or where this is not possible, be mitigated to protect the integrity of the site(s). Development that would adversely affect the integrity of one or more internationally important site(s) will only be permitted where there are no alternative solutions or and there are imperative reasons of overriding public interest, and where suitable compensatory provision has been made. Any mitigation or compensatory provision must be assessed in a project related Habitats Regulations Assessment and be fully functional before any likely adverse effect arises.</p> <p>Other protected sites, habitats and species</p> <p>2. 3. Development that would cause significant harm to a Site of Special Scientific Interest (SSSI), Local Wildlife Site, Local Nature Reserve, Local</p>	

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	<p>Geological Site, Priority Habitat(s), legally Protected Species and / or Priority Species, without adequate mitigation that would not be adequately mitigated or as a last resort compensated, will be refused.</p> <p>3. 4. Development that would be likely to cause any harm to ecological or geological interests will only be permitted in:</p> <p>a) Sites of Special Scientific Interest where there are no alternatives and where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) ecological network; and</p> <p>b) Local Sites (Local Wildlife Sites, Local Nature Reserves and Local Geological Sites) and Priority Habitats: where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site (or Priority Habitat) and its broader contribution to the LCR Ecological Network.</p> <p>Mitigation, replacement or other compensatory provision</p> <p>4. 5. Where necessary to avoid harm, appropriate mitigation, replacement or other compensatory provision will be required. The location of such measures will be targeted, using the following sequential approach (with (a) being the preferred approach and (d) being the least preferred):</p> <p>a) on the development site;</p> <p>b) locations within the immediate locality and /or supporting LCR Ecological Network;</p> <p>c) locations that fall within the LCR Nature Improvement Area and within the Borough; and lastly</p> <p>d) locations that fall within the LCR Nature Improvement Area but outside the Borough.</p> <p>This sequential approach will also apply to the delivery of Biodiversity Net Gain improvements to be delivered in line with new development, in accordance with the Environment Bill.”</p>	

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	<p>Evidence requirements</p> <p>5. 6. Development proposals that would affect a designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and / or compensation proposals, and of any proposed management measures.</p> <p>6. Designated sites are shown on the Policies Map and Plan policies will also apply to any other sites that may be recognised during the Plan period as being of nature conservation importance, including land provided as compensation.”</p> <p>“7. Further details concerning the implementation of this policy will be set out in the Council's proposed Nature Conservation Supplementary Planning Document.”</p> <p>“7.6.1 The Liverpool City Region (LCR) authorities have identified an Ecological Network that includes a Core Biodiversity Area of designated nature and geological sites, Priority Habitats, wildlife corridors and stepping stone habitats. The LCR Nature Improvement Area (NIA) identifies opportunities for further habitat restoration, creation or enhancement, focussed within 17 Nature Improvement Focus Areas, 2 of which are located wholly or in part within St.Helens Borough. The following hierarchy of sites and habitats are found within the Borough:</p> <ul style="list-style-type: none"> • Functionally Linked Land (FLL) for sites of international nature importance (European Sites) including the Ribble and Alt Estuaries Special Protection Area (SPA), Martin Mere SPA, the Mersey Estuary SPA, Liverpool Bay SPA and the Manchester Mosses Special Area of Conservation; • Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest; • Sites of local nature and geological importance, which in St.Helens Borough 	

Main Modification Reference	Change (deleted text in strikethrough ; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs)</p> <p>• Priority habitat and species, and legally protected species.</p> <p>7.6.2 Policy LPC06 sets out how sites, habitats and species within this the hierarchy of sites, habitats and species will be protected and managed with the objective of ensuring that there will be no net loss of the ecological resource. The policy will also guide how appropriate mitigation, replacement or other compensation measures should be identified.”</p> <p>“7.6.5 It has been identified that new housing development in the Liverpool City Region Borough, particularly when considered cumulatively, may is likely to cause significant ecological effects on the Sefton Coast SAC and other designated European sites around the Liverpool City Region due to increased recreational pressure. The Council is working with other local authorities and partner organisations in the City Region to quantify these effects and to identify, through the preparation of a City Region wide Recreation Mitigation Strategy, a strategic and consistent approach to any mitigation that is required. This may include the use of developer contributions (if these are shown to be necessary to mitigate the effects of development in different parts of the City Region on the European sites). Any such contributions linked to development in St Helens Borough will be proportionate to the identified scale of its impacts. The Council will use this approach, subject to agreement of its details, to address this issue.</p> <p><u>7.6.6 The City Region Recreation Mitigation Strategy referred to in paragraph 7.6.5 above has yet to be completed. However, within St Helens any developer contributions are likely to be focussed at least in part on the delivery of strategic greenspace enhancements in the local area, for example at Bold Forest Park. The Bold Forest Park (BFP) Area Action Plan forms part of the St Helens Development Plan and provides a framework for the development of the BFP area, which covers about</u></p>	<p>Comment: the SHBC position suggests there are significant effects on designated sites, but these have not been quantified. Nor has the scope of any mitigation been identified. We would question the validity and legality of this approach, but accept it is for the statutory bodies to advise on such matters.</p>

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	<p><u>1,800ha of land in the southern part of the Borough. Due to its location on the urban fringe of St Helens, the BFP is potentially accessible to a large sub-regional population and is capable of playing an important role as an alternative recreational destination. The Council will continue to promote the BFP as a sub-regional greenspace and to seek opportunities for additional funding to help improve the functionality and management of the BFP.</u></p> <p><u>Nationally and locally important sites and species</u> 7.6.67 Paragraphs 2-4 3-5 of Policy LPC06 set out the requirements for development that would affect nationally and locally important sites and species, including how any benefits from such development will be weighed against its impact on nature conservation interests and the ecological network as a whole.</p> <p><u>7.6.8 As at October 2020, there are seven LNRs in St Helens Borough which collectively cover an area of 11.27 hectares these are listed below.</u> <u>Local Nature Reserves in St Helens</u> [Table not included in this response]</p> <p><u>St Helens Borough includes 116 Local Wildlife Sites. These are Listed in Appendix B of the Nature Conservation SPD.</u></p> <p>7.6.79 For Sites of Special Scientific Interest, significant harm includes adverse effects on the site’s notified special interest features. The advice of suitably competent persons should be sought by applicants and the decision maker in relation to this policy. The focus of significant harm and the approach regarding avoidance, mitigation, replacement or other compensatory provision to secure no net loss of biodiversity is in line with principles set out in the NPPF, Planning Practice Guidance 06/2005 Biodiversity and Geological Conservation, and Biodiversity 2020: A strategy for England’s wildlife and ecosystems services.</p>	

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	<p>7.6.8 The Council and other public bodies have a duty, under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to conserve biodiversity when carrying out their normal functions. This duty includes Priority Habitats and Species, that are defined as “habitats and species of principal importance” for the conservation of biodiversity in England. The Secretary of State has identified, in accordance with Section 41 of the Act, 65 Priority Habitats and 1,150 Priority Species. Priority habitats sit outside the hierarchy of designated sites and may be of national (e.g., ancient woodland) or local importance.</p> <p>7.6.910 The Priority Species in St.Helens ...”</p> <p>“7.6.167will be set out in the Council’s Nature Conservation SPD.</p> <p><u>Monitoring</u></p> <p><u>7.6.18 Monitoring of Biodiversity Net Gain is likely to be undertaken in response to Government requirements outside the scope of the Local Plan. Further clarity on this is awaited at the national level.”</u></p>	
MM027	<p><u>“3) The Council will support the expansion of the Greenway network, including through the provision of new routes, such as those set out in Figure 7.2, subject to the availability of funding and other feasibility requirements being met.”</u></p> <p>“7.9.3 Greenways provide a range of benefits to the community such as sustainable access between homes, local services and employment sites and a healthy form of recreation. They also provide wildlife habitat and corridors, enhance the landscape and townscape and help the Borough to adapt to the effects of climate change. <u>Collectively, greenways support the Council’s Climate Change Emergency declaration through</u></p>	Support.

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	<u>providing opportunities to travel by sustainable modes.</u> The European Greenways Association defines greenways as ...”	
MM028	“7.15.1 The NPPF states that the planning system <u>planning policies and decisions</u> should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes <u>recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital.</u> ”	Object. The proposed MM deletes the reference to “valued landscapes”, when Policy LPC09: “Landscape Protection and Enhancement” to which this Reasoned Justification is concerned with landscapes. The deleted text “by protecting and enhancing valued landscapes” should be re-instated and consideration to a fuller, more accurate and relevant quotation/summary of paragraph 174 of NPPF from which the MM text is taken.
MM029	“6. Development proposals should <u>must</u> be designed and laid out in a manner that would retain <u>not damage or destroy</u> any tree subject to...” “7.18.2 Trees and woodlands are an integral component of Green Infrastructure forming part of the network of natural habitats and improving the visual appearance of the countryside and urban areas. They also provide opportunities for the positive use of the Green Infrastructure for recreation, education, health, biodiversity, regeneration and mitigation of adverse effects caused by climate change, air pollution and water run-off. <u>Therefore, the retention of existing, and the planting of new trees and woodland areas will support the Council’s Climate Change Emergency declaration.</u> Their value is recognised in the Regional Forestry Framework Woodland”	Support. Support.
MM030	<u>“3. The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the National Planning Policy Framework. Development affecting heritage assets</u>	Support.

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	<p><u>Development affecting heritage assets</u></p> <p>3.4. Development proposals that would lead to substantial harm to (or total loss of significance of) a designated heritage asset will be refused permission unless it can be demonstrated that:</p> <p>a) the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or total loss; or</p> <p>b) all the other exceptions set out in paragraph 195 of the National Planning Policy Framework (or any successor national policy that supersedes this paragraph) apply.</p> <p>4. Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p>5. Development involving harm to or loss of any non-designated heritage asset (such as any building identified on a Local List prepared by the Council) will <u>only be permitted where the benefits are considered sufficient to outweigh the harm, having regard to the scale of the harm and the significance of the heritage asset.</u> refused unless any public benefit from the development would outweigh such harm or loss.</p> <p>6. Development and other works will be required to preserve or enhance the appearance, character and setting of all heritage assets (whether designated or not) by using good design and appropriate materials, detailing, scale, massing, siting, layout and landscaping.</p> <p>7 <u>6.</u> Where the complete or partial loss of any heritage asset is justified, the asset's significance must be recorded to a standard agreed by the Council and made publicly available.</p> <p>Areas of archaeological interest</p>	

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>8-7. Any development proposal that may affect one or more asset(s) of ...” Re-number subsequent Policy sections</p>	
<p>MM031</p>	<p><u>Flood Risk</u></p> <p><u>1. The impact of development proposals on flood risk and water management assets will be considered in accordance with case law, legislation and the National Planning Policy Framework.</u></p> <p>1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.</p> <p>Any assessment and mitigation should have regard to:</p> <ul style="list-style-type: none"> a) the St.Helens Strategic Flood Risk Assessment; b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan. <p>2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:</p> <ul style="list-style-type: none"> a) within flood zones 2 or 3; or b) on a site of 1 hectare or larger within flood zone 1; or c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or d) in any area identified by the Council as being at intermediate or high risk of surface water flooding. <p>3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:</p>	<p>Support.</p>

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	<p>a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;</p> <p>b) any applicable Exception Test required by national policy has been passed; and</p> <p>c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.</p> <p>4.2. Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):</p> <p>a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;</p> <p>b) protect heritage assets (such as buried archaeology);</p> <p>c) be fully described in the development proposal; and</p> <p>d) be funded by the developer, including long-term maintenance.</p> <p>5.3. Any proposal for major development⁵⁶ on a site that would abut, run alongside or straddle any watercourse⁵⁷ in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.</p> <p>6.4. The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.</p> <p>Water Quality</p> <p>7.5. Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or</p>	

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	<p>element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction Management Plan that sets out how the water environment.</p> <p>Sustainable Drainage Systems 8.6. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. <u>Inclusion of sustainable drainage systems within proposed major development sites will be assessed in accordance with national policy.</u> Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option): a) an adequate soakaway or other form of infiltration system; b) an attenuated discharge to watercourse; c) an attenuated discharge to public surface water sewer; d) an attenuated discharge to public combined sewer. 9.7. Surface water management infrastructure within new developments should Re-number subsequent policy sections accordingly.</p>	
MM032	<p>“4. New developments for housing, employment or other uses will be required to meet high standards of sustainable design and construction and minimise carbon emissions <u>equivalent to CSH level 4, ie. 19% carbon reduction against Part L 2013 unless proven unviable.</u> To this end they should use energy efficiently and where feasible incorporate decentralised energy systems”</p> <p>“7.27.1 ...The NPPF indicates that planning has a key role to play in supporting the delivery of renewable and low carbon energy by reducing greenhouse gas emissions and encouraging energy production from such</p>	<p>Support.</p> <p>Support.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>sources, <u>and this Policy, in conjunction with a number of other Policies in this Plan, will support the Council’s Climate Change Emergency declaration.</u></p> <p>“7.27.5 The Liverpool City Region Renewable Energy Capacity Study 2010 assessed the scope for large scale wind and other forms of renewable energy generation across the City Region. Although it identified some areas of search for wind energy development, none of these were in St.Helens Borough. The Council acknowledges however that some forms of wind energy development may be acceptable within the Borough. In such cases the applicant would need to demonstrate that their development is technically feasible and acceptable taking into account factors such as wind speed, environmental and landscape designations and proximity to sensitive receptors such as residential properties and heritage assets. All proposals will be expected to comply with all relevant criteria set out in Policy LPC13, other policies of this Plan and national policy.”</p>	<p>No comment to make.</p>
MM033	<p>“1. The Council will seek to ensure that the Borough of St. Helens provides a steady and adequate supply of minerals to contribute towards local, regional and national needs. To minimise the ...”</p> <p>Section 4 “4. Proposals for the exploration, extraction, storage, processing and / or distribution of minerals will only be permitted if it has been demonstrated that...”</p>	<p>No comment to make.</p>
MM034	<p>“All proposals for development will be expected, as appropriate having to their scale, location and nature, to meet or exceed the following requirements:</p> <ol style="list-style-type: none"> 1. Quality of the Built Environment <p>a) Maintain or enhance the character and appearance of the local environment, <u>with a focus on the importance of local distinctiveness, as</u></p>	<p>Support.</p>

Main Modification Reference	Change (deleted text in strikethrough ; new text underlined and bold ; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p><u>well as using good design to improve the quality of areas that may have become run down and be in need of regeneration</u>, for example with regard to the siting, layout, massing, scale, design and materials used in any building work, the building-to-plot ratio and landscaping;</p> <p>b) Avoid causing <u>unacceptable</u> harm to the amenities of the local area and surrounding residential and other land uses and occupiers;</p> <p>c) Ensure that the occupiers of new developments will enjoy a <u>high</u> an appropriate standard of amenity and will not be <u>unacceptably</u> adversely affected by neighbouring uses and vice versa;</p> <p>g) Provide landscaping, <u>including tree-lined streets</u>, as an integral part of the development ...</p> <p>h) <u>Encourage the inclusion of</u>, include or contribute make a contribution to, the provision of public art <u>within</u> appropriate <u>schemes</u> circumstances (for example where the development would be of a substantial size and / or in a prominent gateway or town centre location);</p> <p>i) Provide for the needs of special groups in the community such as the elderly and those with disabilities <u>as identified in Policy LPC01</u>; and</p> <p>j) Protect the ...”</p> <p>“8.3.10 As part of the Council’s positive strategy to promote energy from renewable and low carbon sources, new development should also, subject to the requirements of Policy LPC13, be designed to facilitate the incorporation of renewable and / or other low carbon technologies. <u>Taken together, this approach will support the Council’s Climate Change emergency declaration, particularly in respect of delivering energy efficient and low-carbon developments.</u>”</p>	
MM035	<p>“3. Provide appropriate landscaping, <u>including tree-lined streets</u>, using native tree and ...</p> <p>6. avoid causing unjustified harm to the character or setting of any listed building(s), conservation area(s) or any other designated or non-designated</p>	Support.

Main Modification Reference	Change (deleted text in strikethrough ; new text underlined and bold ; changes to diagrams, tables, etc. described in <i>italic text</i>).	SHGBA Response
	<p>heritage asset, <u>ensure heritage assets are treated</u> in accordance with Policy LPC11 <u>to support the Council’s ambition to promote the conservation and enhancement of the Borough’s heritage assets and their settings in a manner appropriate to their significance;</u></p> <p>7. <u>consider the Borough’s environmental assets (including, but not limited to, biodiversity and associated habitats, landscapes, trees, woodland and hedgerows) in accordance with policies LPC06, LPC08, LPC09 and LPC10</u> avoid causing harm to any important natural habitat, historic or other important landscape, mature tree(s), hedgerow, wildlife habitat, pond or watercourse, and where practicable incorporate positive aspects of these features into its design and layout;”</p>	
MM036	<p>“... a) ... in the area; or b) the development would generate a need for open space that cannot be satisfactorily or fully met by existing provision in the area.; <u>or c) it is appropriate to provide certain typologies of open space as part of the design to provide accessible children’s play areas and create a visually attractive development.”</u></p> <p>b) the quantity, accessibility and quality of existing provision in the area.</p> <p><u>3. Provision for outdoor sports facilities will be achieved through contributions to enhance existing facilities or the provision of new facilities, which will be informed by the Council’s latest Playing Pitch Strategy and Action Plan.”</u></p> <p>3.4. The required amount of open space ...”</p> <p>Subsequent policy paragraphs to be renumbered.</p>	Support.

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	<p>“8.9.5 The requirements of Policy LPD03 concerning open space are in addition to any requirements for outdoor sports facilities such as playing pitches. Any requirement for outdoor sports provision that arises from new residential development will be addressed separately in accordance with Policy LPA08: Infrastructure Delivery and Funding and Policy LPC05: Open Space and Outdoor Sports Facilities.”</p> <p>Make changes to the Reasoned Justification in accordance with the modifications listed in this document under MM025, associated with Policy LPC05.</p> <p>Subsequent paragraphs to be re-numbered.</p>	
MM037	<p>“2. There would be no significant adverse impact on the living conditions amenity of any occupiers of neighbouring properties caused by overlooking, loss of privacy or reduction of daylight / sunlight to habitable rooms or garden areas;</p> <p>....</p> <p>4. ... off road parking, or lack of visibility or impact on the safety and free flow of traffic;</p>	
MM038	<p>“All new housing and employment development should make provision for the latest generation of information and digital communication (ICT) networks to a standard that is compatible with the infrastructure available, or is likely to become available in the Plan period, in the area in which the development would be sited. 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.”</p>	No comment to make.
MM039	<p>“8.27.6 ... All proposals for new development that could give rise to significant amounts of traffic must include information on any increase</p>	Support.

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	<p>in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases. <u>In doing so, this Policy will support the Council’s Climate Change Emergency declaration.”</u></p> <p>“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. <u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, ‘smaller developments’ is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council’s ‘Guidance Notes for the Submission of Transport Assessments’ (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will be determined on a site by site basis.</u> Any significant effects would need to be addressed in line with Policy LPC06.</p> <p><u>“8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u></p> <ol style="list-style-type: none"> <u>1. Electric vehicle charging points at parking spaces;</u> <u>2. Provision of a communal minibus (particularly if electric), and car club space;</u> <u>3. Cycle parking and shower facilities for staff;</u> <u>4. On-site services (e.g. GP surgeries and</u> 	

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	<p><u>shops) to reduce need for off-site movements;</u> <u>5. Personalised Journey Planning services for residents. If employment premises the company could provide incentives for carsharing and minimising car journeys for work;</u> <u>6. Production of sustainable travel information for residents e.g. accurate and easily understandable bus timetables;</u> <u>7. Implementation of a Staff Management Plan to place restrictions on car use by Staff;</u> <u>8. For vehicles generating HGV movements, restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.</u></p>	
MM040	<p>“1. Proposals for food and drink uses (including restaurants, cafes, drinking establishments and the sale of hot food for consumption off the premises) <u>which consist of new built development or those that are not classed as permitted development for Change of Use under use Class E or are Sui Generis</u> will only be permitted where all of the following criteria are met:”</p> <p>“8.30.2 Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses within Classes A3 to A5 of the Use Classes Order1 i.e., restaurants and cafes, drinking establishments and hot food takeaways. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways falling within use Class A5. The policy does not apply to shops within Use Class A1 that sell food for consumption off the premises. <u>The Government introduced a new Use Class E on 1st September 2020 which now groups Restaurants and Cafes within Use Class E. Therefore, proposals to change within the same use class do not require Planning Permission. Paragraphs 1 and 2 of Policy LPD10 only apply to restaurant and café applications where a new unit is proposed or where the existing use class E cannot be demonstrated. Proposals for drinking establishments and hot food takeaways are now Sui</u></p>	No comment to make.

St Helens Local Plan Main Modifications – Response of SHGBA

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<u>Generis and remain unaffected. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways.</u>	
MM041	Glossary changes	No comments to make.
MM042	Delete Appendix 2	No comments to make.
MM043	Appendix 4 Monitoring Framework	No comments to make.
MM044	Appendix 5 Site profiles Allocated Employment and Housing Sites	See response on Annex 1
MM045	Appendix 7 Site profiles Safeguarded employment and housing sites	See response on Annex 2
MM046	Appendix 11 St Helens Town Centre Plan	No comments to make
Annex 1 – Site 8HA	Following text addition: • <u>The internal site layout should provide a permeable network for walking and cycling, linking to the external adopted highway and greenway networks. This shall include the provision of pedestrian and cycleway access to and along Rainford Linear Park and to public right of way 831.</u>	No objection to suggested text changes. Our original site objection remains unaffected by this comment.

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	<p><u>• Accessible bus stops should be provided adjacent to the site according to Merseytravel’s specification.</u></p> <p>Following text deletion:</p> <p>• The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.</p>	
<p>Annex 2 – Site 3HS</p>	<p>Following text deletion:</p> <p>Financial contributions for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.</p> <p>Following text addition:</p> <p><u>• Any other measures needed to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health and other services in the surrounding area.</u></p>	<p>No objection to suggested text changes. Our original site objection remains unaffected by this comment.</p>
<p>Annex 2 – Site 6HS</p>	<p>Following text deletions:</p> <p>• Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.</p> <p>• The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.</p> <p>Following text addition:</p>	<p>No objection to suggested text changes. Our original site objection remains unaffected by this comment.</p>

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<ul style="list-style-type: none"> <u>Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health and other services in the surrounding area.</u> 	
Annex 2 – Site 7HS	<p>Following text deletions:</p> <ul style="list-style-type: none"> Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03. The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02. <p>Following text addition:</p> <ul style="list-style-type: none"> <u>Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health and other services in the surrounding area.</u> 	No objection to suggested text changes. Our original site objection remains unaffected by this comment.
Annex 2 – Site 8HS	<p>Following text deletions</p> <ul style="list-style-type: none"> 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. <p>Following text addition:</p> <ul style="list-style-type: none"> <u>Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health and other services in the surrounding area.</u> 	

St Helens Local Plan Main Modifications – Response of SHGBA

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
Annex 3		No comment to make.
Annex 4		No comment to make.
Annex 5		No comment to make.
Annex 6		No comment to make.
Annex 7		No comment to make.
Annex 8		No comment to make.
Annex 9		No comment to make.
Annex 10		No comment to make.
Annex 11		No comment to make.
Annex 12		No comment to make.

R00478

[REDACTED]

From: marlene downey [REDACTED]
Sent: 11 January 2022 18:14
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan,

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

I am writing to inform you that I support the comments of RAFFD and GRAG Regards Marlene Downey
261 Liverpool Road,
Haydock
St. Helens
Merseyside
WA119RT

Sent from my iPad

R00488

[REDACTED]

From: Deborah Duffy [REDACTED] >
Sent: 12 January 2022 10:12
To: planningpolicy@sthelens.gov.uk

CAUTION: This email may be from an unknown source. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

I endorse the issues raised on behalf of the SHGBA -180 Two Butt Lane, Rainhill, Liverpool L35 8PT

Yours sincerely

Mrs D Duffy

Sent from my iPhone