

**R00507**

[REDACTED]

---

**From:** john dykhuizen [REDACTED]  
**Sent:** 10 January 2022 18:09  
**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 wish to inform you that I agree with the comments made by RAFFD and GRAG regarding the local plan.

Best regards

John dykhuizen  
17 Langholm Road  
Garswood  
Wn4 0sg

[Sent from Yahoo Mail on Android](#)

R00528

St. Helens Borough Local Plan Submission Draft: Schedule of Proposed Main Modifications Consultation - Homes England Response 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 16:30

JH Joe Hobbs [Redacted]  
 Thu 13/01/2022 16:30  
 To: planningpolicy@sthelens.gov.uk



Homes England Respons...  
 114 KB

**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 find attached Homes England's response to the above consultation.  
 Kind regards,  
**Joe Hobbs MRTPI**  
 Planning and Enabling Manager



1st Floor Churchgate House  
 56 Oxford St  
 Manchester  
 M1 6EU

[@HomesEngland](#)

**#MakingHomesHappen**  
 We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)



OFFICIAL

OFFICIAL

Homes England is the trading name of the Homes and Communities Agency. Our address for service of legal documents is One Friargate, Coventry, CV1 2GN. VAT no: 941 6200 50. Unless expressly agreed in writing, Homes England accepts no liability to any persons in respect of the contents of this email or attachments.

Please forward any requests for information to: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

**CONFIDENTIALITY AND PRIVACY**  
 This message is intended solely for the addressee and may contain confidential information. If you have received this message in error, please reply to this e-mail highlighting the error to the sender, then immediately and permanently delete it.  
 Do not use, copy or disclose the information contained in this message or in any attachment.

For information about how we process data and monitor communications please see our [Personal Information Charter](#).

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



Homes  
England

Freepost LOCAL PLAN,  
St Helens Borough Council,  
St Helens Town Hall,  
Victoria Square,  
St Helens,  
WA10 1HP;

By email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Date: 13<sup>th</sup> January 2022

Dear Sir / Madam,

**St. Helens Borough Local Plan Submission Draft: Schedule of Proposed Main Modifications**

**Homes England Response**

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the consultation.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England has previously made representations to the Local Plan Process in March 2019 and more recently submitted Hearing Statements to the Examination in Public in May/June 2021. These Hearing statements related to Omega South Western Extension (Site 1EA) which at the time was under Homes England ownership, and is allocated for employment and consequential release from the Green Belt in the St Helens Borough Local Plan Submission Draft. This land has now been sold by Homes England, as of 7<sup>th</sup> January 2022, to form part of the wider development at Omega West pertaining to application ref: P/2020/0061/HYBR which was approved by Secretary of State in November 2021.

Homes England  
1<sup>st</sup> Floor Churchgate House  
56 Oxford Street  
Manchester  
M1 6EU

Please send all Local Plan and related consultations to

[REDACTED]

[REDACTED]

[www.gov.uk/homes-england](http://www.gov.uk/homes-england)

OFFICIAL

Homes England does not wish to make any representations on this consultation. We will however continue to engage with you as appropriate.

Yours faithfully,



P.P Nicola Elsworth  
Head of Planning and Enabling

R00532

[REDACTED]

---

**From:** John Fairclough [REDACTED] >  
**Sent:** 12 January 2022 10:28  
**To:** planningpolicy@sthelens.gov.uk  
**Cc:** [REDACTED]  
**Subject:** THE FORMER ECCLESTON PARK GOLF COURSE (EPGC) SITE REF "3HS".

**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 ALL the issues raised on behalf of the RSOGB, SHGBA & all the residents of these areas.**

It is important that the Council, Councillors and the Inspectors are aware of the strength of feeling about unnecessary building on Green Belt, particularly as St Helens has sufficient Brownfield land to meet our recognised needs for the foreseeable future.

Government policy were "Green Belt" is concerned, states that;

**A SITE MAY ONLY BE TAKEN OUT OF "GREEN BELT" STATUS, "IF SPECIFIC REASONS HAVE BEEN STATED, PROVED & AGREED"**

**THE COUNCIL HAS NEVER SHOWN, WITH EVIDENCE, ANY SPECIFIC REASONS TO THE BOROUGH'S RESIDENTS AND SUPPORTERS**

From;

Mr & Mrs Fairclough  
146 Two Butt Lane  
Rainhill, St Helens. L35 8PT.

[REDACTED]



**R00570**

**From:** Paul Fishwick [REDACTED]  
**Sent:** 07 January 2022 11:24  
**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.

Hello,

I have read through the findings on the local plan that have been identified by the Bold & Clock face action group and agree with their findings with probable errors submitted in the local plan .. so I wish to object in its submission and implementation.

Paul Fishwick, 19 Crawford St .. wa94xq

R00587

[REDACTED]

---

**From:** Pamela Forshaw [REDACTED]  
**Sent:** 11 January 2022 08:58  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Opposition to building on the Green belt  
**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.

Dear Sir/Madam  
40 Howard's Lane, WA10 5HY  
I support the ECRA submission.  
Yours sincerely,  
Pamela Forshaw

Sent from my iPhone

R00596

[REDACTED]

---

**From:** Kath Foster [REDACTED] >  
**Sent:** 13 January 2022 10:08  
**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.

I agree with the comments made by Residents against the Florida Farm Developments and Garswood Residents Action Group in respect of the Local Plan.  
I have lived in St Helens all my life and used to be proud of my hometown but I am now devastated by the damage the Council has already allowed and is planning: permanent destruction of greenbelt that should have been permanent protection and respite; overcrowding and pollution; low paid jobs and insufficient houses for the low paid workers and plans that exacerbate all of this and more as laid out in the documents cited above.

Sincerely,  
Kathryn Foster [Mrs]  
65 Liverpool rd., Haydock, St Helens. WA11 9SD

R00599

**From:** Beverley Foy [REDACTED]  
**Sent:** 11 January 2022 16:43  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** 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.

To whom it may concern,  
Please accept my 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  
Mrs B Foy.



**RO0601**

[REDACTED]

---

**From:** Chris Foy [REDACTED]  
**Sent:** 07 January 2022 08:46  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Local Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**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 there

I endorse the findings of the Bold and Clock Face Action Group with regards to the local plan.

Kind regards,

C J Foy

**RO0626**

ST HELENS BOROUGH LOCAL PLAN – PROPOSED MAIN MODIFICATIONS CONSULTATION Blue category

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:45

LA Leyskens, Andrew  
Thu 13/01/2022 16:45  
To: planningpolicy@sthelens.gov.uk



20220113 St Helens LP ...  
196 KB

**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

**ST HELENS BOROUGH LOCAL PLAN – PROPOSED MAIN MODIFICATIONS CONSULTATION**

Please find attached submission on behalf of United Utilities.

We would welcome the opportunity to discuss further.

Grateful for your confirmation of receipt.

Your faithfully

Andrew Leyskens



**Andrew Leyskens**  
Planning Manager  
Planning, Landscape and Ecology  
M: 07827 807655 (mobex 55283)  
unitedutilities.com

If you have received a great service today why not tell us?  
Visit: [unitedutilities.com/wow](http://unitedutilities.com/wow)

**Let's keep life moving**



Get plenty of fresh air



Regular testing



Have your vaccinations when offered



Continue to wear a face covering



Wash your hands

The information contained in this e-mail is intended only for the individual to whom it is addressed. It may contain legally privileged or confidential information or otherwise be exempt from disclosure. If you have received this Message in error or there are any problems, please notify the sender immediately and delete the message from your computer. You must not use, disclose, copy or alter this message for any unauthorised purpose. Neither United Utilities Group PLC nor any of its subsidiaries will be liable for any direct, special, indirect or consequential damages as a result of any virus being passed on, or arising from the alteration of the contents of this message by a third party.

United Utilities Group PLC, Haweswater House, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington, WA5 3LP  
Registered in England and Wales. Registered No 6559020

[www.unitedutilities.com](http://www.unitedutilities.com)  
[www.unitedutilities.com/subsidiaries](http://www.unitedutilities.com/subsidiaries)

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

■ email only: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Freepost LOCAL PLAN  
St Helens Borough Council  
St Helens Town Hall  
Victoria Square  
St Helens  
WA10 1HP

**Your ref:**  
**Our ref:**  
**Date:** 13-JAN-22

Dear Sir / Madam

### **ST HELENS BOROUGH LOCAL PLAN – PROPOSED MAIN MODIFICATIONS CONSULTATION**

Thank you for your consultation seeking the views of United Utilities on the Proposed Main Modifications to the St Helens Borough Local Plan.

United Utilities wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

Further to the submission of our previous comments we remain significantly concerned that a number of our comments and suggested amendments have not been addressed. As such we wish to reiterate these comments. We have summarised our current position below for completeness.

#### **Our Assets**

We wish to highlight that a number of sites which are allocated in the emerging local plan include water and wastewater infrastructure. Some of this infrastructure is significant and would be material to the future site development. Given the significant implications that such infrastructure could have on the design and development of sites, we are concerned that this is not sufficiently reflected in the site profiles/emerging development plan policies. We therefore strongly recommend that the site profiles and associated policies are updated to reflect these circumstances. Whilst not intended to be an exhaustive list, we wish to note infrastructure at various draft allocations which include those set out below.

- 6EA - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock
- 2ES - Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock
- 1HA - Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood
- 10HA - Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton
- 1HS - Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood
- 3HS - Former Eccleston Park Golf Club, Rainhill Road, Eccleston
- 5HS - Land West of Winwick Road and East of Wayfarers Drive, Newton-le-Willows
- 9EA - Land to the West of Sandwash Close, Rainford

The infrastructure we have at some of these sites includes strategic water supply and wastewater assets.

It is important to outline the need for our assets to be fully considered in development proposals. We will not normally permit development over or in close proximity to our assets. All United Utilities' assets will need to be afforded due regard in the masterplanning process for sites and when bringing forward any transport or public realm improvements. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels of land over our assets. We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible and reflecting such constraints in the site profiles / policy. We would emphasise the importance of understanding the implications of our assets as soon as possible and ideally before any land transaction is negotiated. Where our assets exist on a site, we ask site promoters to contact United Utilities to understand any implications. When considering future development proposals, including public realm or transport improvements, we would request that contact is made with United Utilities to discuss the detail of the proposals at an early stage so that any potential issues can be explored and fully understood. This can be done using our **free pre-application service**. We encourage you to direct future developers / applicants to our free pre-application service to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater



Developer Services – Water



## Public Water Supply

### Groundwater Source Protection Zones (SPZ)

United Utilities acknowledges the reference to groundwater protection within Policy LPD01: Ensuring Quality Development and LPC12: Flood Risk and Water Management. However, owing to the presence of large areas of groundwater protection zones within the borough, United Utilities urges the Council and Inspector to give further consideration to SPZs in the emerging development plan. These are critical public water supply resources which can be materially affected by development proposals if the impact on the SPZs as a result of development is not carefully risk assessed and mitigated. At the current time we remain significantly concerned that there is neither a general policy relating to groundwater source protection zones or that there are clear references to the implications of being located in a groundwater source protection zone in the site specific policies / profiles.

To address this, United Utilities' preference would be to have a standalone Ground Water Protection Policy in the Local Plan and clear reference to the implications of groundwater source protection zones in the site profiles / policies. We recommend both as the principle is equally applicable to any windfall sites that may take place in a SPZ.

As has been raised in previous consultations, SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The prevention of pollution to drinking water supplies is critical and can be a costly development consideration which is not always fully considered by the development industry. As such we urge the council to strengthen the policy associated with groundwater protection reflective of our earlier representations both in terms of allocated sites and potential windfalls.

Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

United Utilities understands that the following site is located within SPZ1 is now identified as safeguarded land.

- Site 5HS - Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows

Additionally, it is worth highlighting that there are a number of sites (listed below) located within SPZ 2:

- Site 2HS - Land between Vista Road and Belvedere Road, Earlestown
- Site 3HS - Former Eccleston Park Golf Club
- Site 4HS - Land East of Newlands Grange (former Vulcan works) and west of West Coast mainline, Newton
- Site 5HS - Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows
- Site 7HA - Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line
- Site 2ES - Land to the east of M6 Junction 23, Haydock
- Site 8EA - Parkside West, Newton-le-Willows

There are also a number of sites within SPZ3 where development considerations will also apply.

Below is United Utilities' Policy wording suggestion in relation to a Ground Water Protection Policy in the Local Plan:

*'Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'The Environment Agency's approach to groundwater protection', or any subsequent iteration of the guidance.*

*New development within Groundwater Source Protection Zones will be expected to conform to the following:*

*RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all*

*phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).*

*MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.*

*CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.'*

### **Flood Risk**

We wish to note that subsequent to previous iterations of the emerging local plan, United Utilities now has available additional information on modelled sewer flood risk. This has indicated sewer flood risk at a range of locations which include those set out below. We recommend that the site profiles / policies for each of these draft allocations reflect this position using the below text.

#### **3HS - Former Eccleston Park Golf Club**

*Existing public sewers pass through this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding and will need to be carefully considered in the design and masterplanning process for any development at this site. The applicant will be required to engage with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.*

#### **2ES - Land to the East of M6 Junction 23 (South of Haydock racecourse), Haydock**

*Existing public sewers pass through this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding and will need to be carefully considered in the design and masterplanning process for any development at this site. The applicant will be required to engage with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.*

#### **4HA - Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)**

*Existing public sewers pass adjacent to this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding and will need to be carefully considered in the design and masterplanning process for any development at this site. The applicant will be required to engage with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.*



## **GTA02 – Gypsy and Traveller Transit Site**

*Existing public sewers pass adjacent to this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding and will need to be carefully considered in the design and masterplanning process for any development at this site. The applicant will be required to engage with United Utilities prior to the submission of any application for planning permission to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.*

## **Policy LPC12 – Flood Risk and Water Management**

United Utilities welcomes the inclusion and renumbering of clauses 8 – 12 of Policy LPC12 which address sustainable drainage. However, for clarity, we do suggest the following minor amendments to clause 10, please note that proposed wording is in *red*, and our suggestions are in *blue*:

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

## **Site Drainage in relation to Ground and Finished Floor Levels**

With respect to the detailed design of new development sites, we would like to reiterate the importance of careful consideration of site drainage in comparison with proposed ground and finished floor levels. We recommend policies on the design of new development make reference to the need for applicants to carefully consider the ground and finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer. This helps ensure new development is more resilient to the impacts of climate change and the potential for flooding from sewers. The suggested wording is set out below.

*'Applicants will be expected to carefully consider the ground and finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer.'*

## **Policy LPD02: Design and Layout of New Housing**

We suggest Policy LPD02 includes an additional clause to ensure water efficiency measures are fully considered in the design of new development. Below is the wording that we would recommend including within this policy:

*'New residential developments will be required to:*

*'11. demonstrate the site is drained in the most sustainable way, (making use of topography, landscaping and ground conditions). Applicants will be required to incorporate sustainable drainage which is multi-functional in preference to traditional underground piped and tanked storage systems and ensure that the drainage is linked to wider landscaping proposals.'*

*'12. Demonstrate the new development has considered incorporating water efficiency measures as part of the design.'*

United Utilities seeks to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

#### **Policy LPA04.1 and LPA05.1 Strategic Sites**

United Utilities supports Policy LPA104.1 (Strategic Employment Sites) and Policy LPA105.1 (Strategic Housing Sites) which requires the submission of a comprehensive masterplan which addresses the need, at clause f, to include measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12.

Notwithstanding this, United Utilities seeks to emphasise the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.

United Utilities highlights concerns regarding those large sites which are in multiple ownership. These can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries. In practice where sites are in multiple ownership, the achievement of sustainable development can potentially be compromised by developers / applicants working independently. We therefore encourage the council to make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework. It should be demonstrated that there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from the allocated sites in the most sustainable and co-ordinated manner.

When considering the above, it should be noted some of the allocated Strategic Sites contain little existing infrastructure. Therefore, any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery. Some of the allocations are adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewage infrastructure networks which are of a small diameter and can have limited capacity to support future growth. Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support growth. This re-emphasises the need for a co-ordinated approach to development, especially those development sites that are to be developed over a number of phases.

We would recommend the following amendment to the policy below, that is part of both LPA04.1 and LPA05.1:

*a comprehensive infrastructure phasing strategy for the provision of all new, expanded and / or enhanced infrastructure for delivery over numerous phases and that is required to serve the development of the whole site; and*

## **Policy LPD05: Extension, Alteration or Replacement of Buildings in the Green Belt**

United Utilities wishes to highlight that it owns assets which are currently situated in the Green Belt. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future environmental drivers. United Utilities requests support for any consequential investment which will be necessary as a result of the growth identified by the local plan and by any associated development plans. It is therefore requested that policy is worded to recognise that utility sites, located within the green belt, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.

United Utilities requests the Council's support for future investment in infrastructure in order to be able to expediently respond to the needs of St Helens. With regards to those sites situated in the Green Belt, national policy within the NPPF allows for:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
- limited infilling or the partial or complete redevelopment of previously-developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.

On this basis, we are of the opinion that National Policy is broadly supportive of the expansion of our key operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies, and reflected on your proposals map. We recommend a policy based on the following wording.

*'Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.'*

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of future development can be achieved. OS location plans of our sites for this purpose have been sent as part of previous consultations.

### **Summary**

Moving forward, we respectfully request that the council continues to consult with United Utilities for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me using the above contact details.

Yours faithfully

Andrew Leysens  
Planning, Landscape and Ecology  
United Utilities Water Limited

**RO0636**

[REDACTED]

---

**From:** Claire Gerrard [REDACTED]  
**Sent:** 10 January 2022 18:58  
**To:** [planningpolicy@sthelens.gov.uk](mailto: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.

Please note I endorse the Bold and Clock Face action groups findings.  
Regards  
Mrs Claire Gerrard  
Local resident

**R00637**

[REDACTED]

---

**From:** Barry Gerrard [REDACTED]  
**Sent:** 10 January 2022 19:00  
**To:** [planningpolicy@sthelens.gov.uk](mailto: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.

Please note I endorse Bold and Clock Face action groups findings.

Regards

Mr Barry Gerrard

Local resident

**RO0641**



[REDACTED]

---

**From:** Stephen Gerrard [REDACTED]  
**Sent:** 06 January 2022 21:43  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** Local plan (Modifications)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**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 would like to inform you that I agree with  
Bold and Clock Face action groups findings and objections to the local plan.

**R00665**

Response to Main Modifications Consultation on behalf of Eccleston Homes Ltd Blue category

- This message was sent with High importance.
- 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 15:26

KS **Kate Salter** Thu 13/01/2022 15:26 🔗 📧 ↶ ↷ → ⋮

To: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 [Redacted]

FINAL Response to St H ...  
 1 MB

**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,

Please find attached to this email a response to the Main Modifications prepared by Nexus Planning submitted on behalf of Eccleston Homes Ltd. The response comprises;

- Covering Letter
- Completed Response Form
- Extract from West Lancashire's Local Plan Policy RS6 'A "Plan B" for Housing Delivery in the Local Plan'.

Many thanks

Kind regards  
 Kate

**Kate Salter**  
 Planner



**Nexus Planning**  
 Eastgate, 2 Castle Street  
 Castletield  
 Manchester M3 4LZ

[nexusplanning.co.uk](http://nexusplanning.co.uk)



IMPORTANT - this e-mail and the information that it contains may be confidential, legally privileged and protected by law. Access by the intended recipient only is authorised. Any liability (in negligence or otherwise) arising from any third party acting, or refraining from acting, on any information contained in this e-mail is hereby excluded. If you are not the intended recipient, please notify the sender immediately and do not disclose the contents to any other person, use it for any purpose, or store or copy the information in any medium. Copyright in this e-mail and attachments created by us belongs to Nexus Planning Limited: the author also asserts the right to be identified as such and object to any misuse. Should you communicate with anyone at Nexus Planning Limited by e-mail, you consent to us monitoring and reading any such correspondence. Nexus Planning Limited Tel. +44 (0) 118 214 9340 E-Mail: [Postmaster@nexusplanning.co.uk](mailto:Postmaster@nexusplanning.co.uk)

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

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

**Manchester**  
Eastgate  
2 Castle Street  
Castlefield  
Manchester M3 4LZ  
[nexusplanning.co.uk](http://nexusplanning.co.uk)

Sent to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

13 January 2022

Dear Inspectors

**St Helens Borough Local Plan 2020-2035 Examination  
Response to Main Modifications Consultation on behalf of Eccleston Homes (RO0565/RO1957)**

These representations are submitted on behalf of Eccleston Homes in relation to the Schedule of Proposed Main Modifications to the St Helens Borough Local Plan 2020-2035, November 2021 (SHBC036).

This response builds on Eccleston Homes' previous representations on the Local Plan, including Hearing Statements for Matters 2 (ref: M2.07), 3 (ref: M3.09), 4 (ref: M4.5.12) & 5 (ref: M5.05); representations to the Submission Draft in March 2019 (ref: RO1957); and site-specific representations in relation to the land south of Station Road, Haydock (ref: RO0565), which was previously proposed to be 'Safeguarded Land for Housing' (ref: HS11) at the Preferred Options stage in December 2016.

**Representations on the Main Modifications (November 2021)**

In summary, despite the suggested Main Modifications, Eccleston Homes still remain concerned with the low level of housing growth proposed, the overreliance on sites in the urban area, the lack of any in-built flexibility to the Plan and the absence of a residential allocation and/or safeguarded land at its site to the south of Station Road in Haydock.

**Proposed Modification MM001**

We understand MM001 proposes to extend the plan period until 2037 (including updates to housing requirements and supply information), to ensure a 15-year plan period upon adoption in 2022. Eccleston Homes supports this change, but as set out in our previous representations, the proposed housing requirement still fails to adequately respond to circumstances which justify an additional uplift above the standard Method local housing need ('LHN') minimum.

Eccleston Homes still considers that the most appropriate minimum housing requirement for St Helens over the plan period should be 547 dwellings per annum ('dpa'). This represents the Standard Method LHN plus an uplift of 20% to account of: stabilising and increasing the borough's working age population; allow for more housing choice and competition; support planned economic growth and regeneration; reflect the

---

London

Birmingham

Manchester

Reading

higher levels of housebuilding achieved before and after the 2008-2009 recession; and previous assessments of housing need.

To deliver this higher minimum housing requirement, particularly across an extended Plan period, additional housing land will be required to be allocated (such as the land south of Station Road, Haydock). Even without a higher housing requirement (as we advocate), the Plan is at significant risk of failure given the precarious housing land supply position (a claimed 5.1 years). In these terms, this MM001 is not positively prepared, effective or consistent with national policy.

### **Proposed Modification MM006**

We understand MM006 proposes to amend Policy LPA02 (Spatial Strategy) to insert new wording justifying the strategic case for exceptional circumstances of removal of land from the Green Belt, including at paragraphs 4.6.10-4.6.13:

*“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... for all 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.”*

Eccleston Homes supports this modification and agree that there is an exceptional need for Green Belt release. However, there is evidence to justify the release of further Green Belt land in addition to that which is currently proposed. In particular, we are concerned that the Local Plan is over reliant on sites in the built-up area (as identified by the SHLAA).

As we have set out in our previous representations, a significant proportion of SHLAA sites do not have planning permission, are currently in other active uses, have been identified for housing for nearly a decade without coming forward, or are located in areas facing viability constraints. There is also a reliance on windfall sites, which may not deliver as projected. In addition, as we have heard at the Examination, there are concerns over the ability of some of the proposed allocations to deliver as predicted. In many cases, the predicted build out rates are overoptimistic and as a result, this leaves the Plan at serious risk of failure from the outset, particularly given the precarious claimed 5.1-year housing land supply.

Eccleston Homes request the Inspectors to consider that, in order to meet the housing requirement (notwithstanding whether the requirement should be the figure proposed by the Council or the higher figure advocated by these representations), more Green Belt land should be released and allocated or safeguarded for residential development. An additional buffer of land would help counter the strong possibility that a significant proportion of sites in the urban area (as identified in the SHLAA) may not come forward, together with the slower or non-delivery of proposed allocations. It would also help ensure choice and competition in the market for land. In these terms, MM006 is not positively prepared, justified or effective.

### **Proposed Modification MM009**

#### **Housing requirement**

We understand MM009 amends Table 4.6 of the Plan (‘Residual Housing Land Requirement’) to update the housing requirement, to 468 dpa.

Eccleston Homes disagrees that a requirement of 468 dpa is a sound approach. In order to stabilise and increase the borough's population, support planned economic growth and reflect the higher levels of housebuilding before the 2008-2009 recession, the Plan's housing requirement should be significantly increased. In our previous representations, we have advocated a requirement of at least 547 dpa. In these terms, MM009 is not positively prepared.

### Housing Land Supply

We understand MM009 updates Table 4.7 and Figure 4.3 in relation to the identified housing trajectory.

#### Five year housing land supply

The total five year housing land supply (2021/22 to 2025/26) is now claimed at 2,388 units, compared to the Submission Draft of 3,280 units. We note that the proportion of units from 'other supply' sources (i.e. sites without planning permission, with planning permission and under construction) has been reduced from the Submission Draft – there is less of a reliance on 'other supply' sites than allocated sites. However, there is still reliance on a 'small sites' windfall allowance to consistently deliver 93 dpa each year.

Overall, against the requirement of 2,342 dwellings, there is a surplus of just 46 dwellings to result in a claimed housing land supply of 5.1 years. Eccleston Homes considers that this is a very precarious supply position, which very seriously places the Plan at significant risk of failure from the outset, which is not an effective or justified, i.e. sound approach. This failure to prepare the Plan in a positive manner will undermine its vision and objectives and the issues in the borough that it is trying to address. It is also inconsistent with national policy.

In our view, the adoption of a plan with just 5.1 years' supply will increase the likelihood of speculative applications being made on Green Belt land and/or Safeguarded sites before the end of the Plan period. It may also undermine the Plan's employment land strategy, if some of these sites are brought forward for residential use instead of their existing or proposed intended use. In these terms, this MM009 is not positively prepared, justified, effective or consistent with national policy.

#### Longer term housing trajectory

As regards the longer term housing trajectory, we note that this is predicted to increase in years 6-10 of the Plan, with a particular peak in 2027/28. Although the peak appears to be unrealistic, Eccleston Homes are broadly supportive of a 15% discount being applied to years 6-16 for non-Green Belt allocated sites, and to 'other supply' sites.

However, to provide further flexibility, an additional buffer of land should be allocated or safeguarded as a contingency, should the Council's housing land supply drop below five years at any point during the latter years of the Plan. This would help to make the plan more effective.

### **Proposed Modification MM011**

We understand that MM011 provides site-specific exceptional circumstances for the proposed safeguarded housing and employment sites, justifying their release from the Green Belt. It also clarifies that such sites would be released for development *"following a future Local Plan update (full or partial) that proposes such development based on the evidence showing a need for this"*.

As stated above, Eccleston Homes are principally concerned regarding the precarious housing land position (a claimed 5.1 years) and the lack of flexibility to address any future supply shortfall quickly. The length of time to undertake and adopt a Local Plan review should not be underestimated (and this ongoing Examination is testament to this point). If such shortfall situations are not resolved promptly, then the ongoing under-delivery of housing can have very serious consequences upon society, including worsening affordability, overcrowding and poor quality housing to name but a few issues. The lack of investment and regeneration can also suppress economic growth and harm progress made to improve the urban environment (through redevelopment) and create quality places. Again, with no suitable buffer of other alternative sites will lead to increased pressure on the Green Belt and sites which are in, or are proposed for, other uses.

As well as allocating more sites for development, safeguarded land could provide a helpful additional buffer of sites, not only in the long-term (beyond the plan period) but also if the policy allowed such land to be released more immediately, for example, to address a housing land shortfall or respond to an increase in the housing requirement (see the approach of West Lancashire's Local Plan Policy RS6 'A "Plan B" for Housing Delivery in the Local Plan' – **enclosed**). Such a mechanism would avoid a lengthy delay associated with a Local Plan update (whether full or partial review).

Eccleston Homes are therefore concerned that no Main Modifications are proposed to make any more allocations of safeguarded land which would potentially provide an additional buffer of housing land. Without this change, the plan is not positively prepared, justified or effective.

For example, Eccleston Homes' land to the south of Station Road, Haydock, was previously proposed to be 'Safeguarded Land for Housing' (ref: HS11) at the Preferred Options stage in December 2016. The Council's Green Belt Review (ref: SD021) found that the parcel scored low against its contribution to purposes 1, 2 and 3 of including the Green Belt, now set out by paragraph 138 of the NPPF (individual parcels contribution to Purposes 4 and 5 was not quantified). On this basis, the parcel's overall significance to the Green Belt was found to be low.

Paragraph 142 of the NPPF requires the promotion of sustainable patterns of development when reviewing Green Belt boundaries, and giving first consideration to land which is previously developed or well-served by public transport. We have previously demonstrated in our Matter 4 Hearing Statement (ref: M4.5.12) that the land south of Station Road, Haydock is accessible and within walking distance of local services and facilities. The Hearing Statement also provides a summary of the work which has taken place on this site to confirm that it is suitable for residential development, and we request that this be considered by the Inspectors.

#### **Additional Main Modifications**

In order for the Plan to be considered sound, it needs to be positively prepared, justified, effective and consistent with national policy. In our view, it would be completely unsound to recommend adoption of a Local Plan which did not demonstrate a robust five year housing land supply from the outset. As we have set out above, the Plan is at significant risk of failure given the precarious housing land supply position (a claimed 5.1 years). The surplus of just 46 dwellings (above the minimum five year requirement) could easily be eroded – it would only take for the non-delivery of one site (which is quite conceivable) for a shortfall to occur.

To address this, Eccleston Homes therefore request that additional sites should be released from the Green Belt allocated for housing, to come forward within the Plan period. Alongside this, the Plan should also designate further safeguarded land and amend the policy to allow such land to come forward for development before the end of the Plan period (as per the West Lancashire approach). We would suggest that providing a 20% buffer to the supply would be prudent.

Such actions would help make the Plan more robust and would drastically improve its soundness.

In particular, we formally request that the land to the south of Station Road, Haydock be allocated for residential development within the Plan period. Alternatively, the site should be reinstated as safeguarded land – it was previously proposed to be ‘Safeguarded Land for Housing’ (ref: HS11) at the Preferred Options stage in December 2016. In either case, the site could provide around 120 new homes to the supply.

As stated above, the site is currently located in the Green Belt but the Green Belt Review (ref: SD021) found that the parcel within which the site is located scored low against its contribution to Green Belt purposes 1, 2 and 3. Consequently, the parcel’s overall significance to the Green Belt was found to be low. By way of context, this is lower than some sites which have been retained as safeguarded land, as MM011 confirms.

Our Matter 4 Hearing Statement (ref: M4.5.12) provides additional information to demonstrate that the site has good development potential, to dispute the Green Belt Review Stage 2B findings (ref: SD021). For example, we have provided additional information to demonstrate that the protected woodland could be retained which would also helpfully create a buffer to the south and to the countryside, while also demonstrating that access is feasible from the surrounding highways.

We appreciate that this will require a whole host of additional Main Modifications to be made to the Plan, and we would be happy to discuss these in further detail at reconvened hearing sessions.

### Summary

Eccleston Homes considers that despite the proposed Main Modifications, the Plan at present is unsound. As well as making the changes advocated in our representations, a more suitable strategy would be to allocate the land south of Station Road, Haydock for around 120 dwellings to come forward during the Plan period. Alternatively, the Inspectors should consider reinstating the proposed safeguarded land designation on the site.

IN addition to this, our previous hearing statements and representations present an appropriate route forward for how the delivery of housing can be ensured.

I would be grateful if you could confirm safe receipt of these representations and formally request that they be taken into account by the Planning Inspectors.

Yours sincerely



**Murray Graham**  
Director



Nexus Planning

enc: Response Form

Extract from West Lancashire's Local Plan Policy RS6 'A "Plan B" for Housing Delivery in the Local Plan'

**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 13<sup>th</sup> 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.

<b>1. Your Details</b>	<b>2. Your Agent's Details (if applicable)</b> (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: John	First name: Murray
Last Name: Matthews	Last Name: Graham
Organisation/company: Eccleston Homes Ltd	Organisation/company: Nexus Planning
Address: Suite 114 Newton House Birchwood Park Warrington	Address: Eastgate 2 Castle Street Manchester
Postcode: WA3 6FW	Postcode: M3 4LZ
Tel No: c/o Agent	Tel No: [REDACTED]
Mobile No:	Mobile No: -
Email:	Email: [REDACTED]

**Signature:**

[REDACTED]

**Date:**

13.01.2022

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 13<sup>th</sup> 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](mailto: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](mailto: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](http://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 **MM001, MM006, MM009, MM011**

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.

Please refer to Covering Letter for details.

Please continue on a separate sheet if necessary

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation.***

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

**7.59** Although some temporary accommodation will not require planning permission, in most cases permission will be required. Operators should always check with the Council's Planning Department, but normally planning permission is required in the following cases:

- If the workers will be housed for longer than a normal planting, growing, or picking season;
- If caravans and other related buildings (e.g. canteens and toilets) are to be kept on site permanently;
- If a change of use to an existing building is involved; or
- If hardstandings and permanent services (e.g. water supply or septic tank) need to be constructed.

**7.60** The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Permanent buildings or caravans which are kept on site for a number of months can reduce the open character of the Green Belt and have an adverse impact on the landscape and the amenity of local residents. Therefore, the above policy has been introduced to limit the impact of this type of development on the local area.

**7.61** The Council has also produced Supplementary Planning Guidance on Accommodation for Temporary Agricultural Workers, which is relevant to the implementation of this policy.

### Other Local Planning Policy and supporting documents

- Accommodation for Temporary Agricultural Workers SPG (2007)

## 7.6 Policy RS6: A "Plan B" for Housing Delivery in the Local Plan

### Context

**7.62** Policy GN2 sets out several sites across the Borough that are safeguarded from development for the needs of a "Plan B", should it be required. Appendix E sets out the key issues in relation to delivery and risk for each individual policy. For Policies SP1 and RS1, these delivery issues often revolve around a similar concern – what if a key site or location for residential development cannot be delivered? Ultimately, this leaves the outcome of the locally-determined target for residential development not being met, unless a viable alternative can be found.

**7.63** Therefore, while it is hoped that all aspects of the Local Plan will be deliverable, and they have been selected because the Council believes that they are, it is prudent to have a "Plan B" prepared in case a key site(s) for residential development does not come forward for development during the plan period. Policy RS6 provides the Council with the ability to enact such a "Plan B" should it become apparent through monitoring that the Local Plan's residential targets are not being met.

**7.64** An additional consideration is the fact that the Local Plan covers a long period (15 years) and, in relation to the locally-determined targets, it is not unreasonable to expect some change in the evidence for those targets over the 15 years, potentially resulting in new targets. Therefore, the Local Plan should be flexible enough to address these changes, as well as any other reasonable change in circumstance, without a wholesale review of the Plan.

### Policy RS6

#### A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- The housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from development for "Plan B" to make up the extra land supply required to meet the new housing target for the remainder of the Plan period.

### Justification

**7.65** The Council believe that the locally-determined targets that have been set in this Local Plan are fair and reasonable in light of all the available evidence at this time. However, it is possible that targets for residential development will rise, meaning that new locations for development would need to be identified, and so in this situation the "Plan B" would also provide the flexibility required to accommodate this rise.

**7.66** In essence, the Council's "Plan B" for the Local Plan involves the release of land from the Green Belt and its allocation as safeguarded land under Policy GN2. This land would be safeguarded from development until the above triggers in Policy RS6 are reached. Until these triggers are reached the land will be protected from development in a similar way to Green Belt (see Policy GN2) and in such a way as to not prejudice the possible future development of this land if the "Plan B" is triggered.

**7.67** The supply of land safeguarded from development for the “Plan B” in Policy GN2 (which has a total capacity of 830 dwellings) is more than sufficient to allow for at least 15% extra on top of the 15-year housing target being proposed in the Local Plan (15% of 4,860 dwellings = 729 dwellings). This percentage is based on the need to ensure that even the largest of the housing allocations in the Local Plan is covered by the flexibility of the “Plan B”, should it fail to be delivered.

**7.68** Ongoing monitoring of housing delivery in the Plan period will enable the Council to be prepared for any trigger points in Policy RS6 being reached. If it is anticipated a year before any trigger point is reached (i.e. at the end of Years 4 and 9 of the Plan) that housing delivery is at risk of triggering the “Plan B”, the Council will commence a review of the level and nature of any undersupply compared to housing requirements. This review will also review the “Plan B” sites themselves in order to identify which site(s) are most suitable to release for development at that time (if any, depending on the nature of, and reasons for, the undersupply), should the level of undersupply ultimately trigger the “Plan B” in April of the following year. The quantum of release will be sufficient to meet the identified shortfall in housing delivery compared to the housing requirements.

**RO0667**



**From:** wendy gore [REDACTED]  
**Sent:** 10 January 2022 20:46  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** St Helens 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 Sir,

I fully support and agree with the response to the St Helens Local Plan Main Modifications submitted to you on 7 January 2022 by Eccleston Community Residents Association together with Windle (ECRA).

The land identified in the St Helens Local Plan as 8HS should be retained as Greenbelt for the reasons fully explained in the ECRA response.

Your faithfully

Wendy Gore  
Laurel Cottage  
2 Catchdale Moss Lane  
St Helens  
WA10 5QG

**RO0668**

**From:** John Gore [REDACTED]  
**Sent:** 11 January 2022 14:48  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** St Helens Local Plan Main Modification

**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 fully support and agree with the response to the St Helens Local Plan Main Modifications submitted to you on 7 January 2022 by Eccleston Community Residents Association together with Windle (ECRA).

The land identified in the St Helens Local Plan as 8HS should be retained as Greenbelt for the reasons fully explained in the ECRA response.

Your faithfully

John Gore  
Laurel Cottage  
2 Catchdale Moss Lane  
St Helens  
WA10 5QG

R00674

# Bold & Clock Face Action Group



This Representation is submitted on behalf of Bold and Clock Face Action Group, comprising 1600 members, in response to the St Helens Borough Local Plan 2020 – 2035 schedule of proposed main modifications. The group are primarily concerned with site allocations 4HA, 5HA, 1EA & 1ES in Bold ward.

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

**Bold and Clock Face Action Group.**

MM007 - support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.

Site 4HA is in direct conflict with policy LPA04 (Building a strong and stable economy) by removing established businesses such as Tunstall's Farm (Parcel GBP\_074\_C). There is no reference to rural established businesses and the impact of this site allocation within the main modifications.

Due to the land being under the ownership of TEN owners would the council be looking to compulsory purchase land owned by non-developers to ensure the parcel is completed in its entirety? There is no reference within the LPSD or the MM's as to how the council plan to handle this issue. There is a high risk of the parcel becoming fragmented leading to required infrastructure not coming forward. St Helens Borough Council Leader David Baines said regarding compulsory purchase...

"There will be no compulsory purchasing of land for housing in the local plan"

MM009 – page 32 section 42

"4.18.1 ... The requirement of 10,206 dwellings per annum set out in Policy LPA05 is designed to meet the full Objectively Assessed"

Incorrect figure quoted for dwellings per annum.

Section 4.18.26 talks about the parcels of land contained within site 4HA making a low to medium contribution to the greenbelt. The 2018 greenbelt review stage 2B states that parcel GBP\_074\_C is to be removed from the developable area and a buffer zone surrounding the parcel will be needed.

**CONCLUSIONS ON DEVELOPABILITY**

**Summary of Developability Assessment**

*Sub-parcel GBP\_074\_C is significantly covered by a LWS (Tunstall's Farm), therefore this area would be removed from the overall developable area and a buffer zone around the site would also be required to prevent harm from potential development.*

*Page 145 of St Helens Council Greenbelt review 2018 stage 2B*

Why has parcel GBP\_074\_C not been removed from the LPSD? There is no reference to this conclusion in the LPSD or MM's. The removal of this parcel would not only support and protect habitat and diversity specifically around the LWS site and act as a buffer but support the small rural business of Tunstall's Farm ensuring compliance with LPA04 and the aims and objectives contained within the Bold Forest Park Area Action Plan.

MM011 – Page 44 section 4.24.4

*“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, meaning that it is likely that post 2037, housing needs may be lower than between 2020 and 2037.”*

With reference to impacts on the economy due to the Covid19 pandemic and reduced housing requirements. This in conjunction with the projected reduction in household growth up to and after 2037 how will the council ensure that site 4HA will be delivered in its entirety and not be left with a fragmented parcel without sufficient infrastructure and services that will have a negative and damaging effect on local communities and the BFPAAP?

MM012

*“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.”*

Considering that Bold Ward is proposed to receive 3550 new dwellings, the Omega West extension (1400 FTE jobs) and further warehouses, why have the A roads in Bold been left out of the above improvements as part of the MRN in the main modifications? It makes sense that the area allocated almost half of the total housing and employment requirement within the LPSD would be top of the list for infrastructure improvements. Increased congestion following existing developments in the area and flooding are already a constant issue in Bold Ward with roads being closed several times per year due to flooding.



A569 Clock Face Road.

Section 1 – “Secure the delivery of new or improved road, rail, walking, cycling, and / or bus infrastructure where required;”

Considering the multiple landowners within site 4HA how will the council ensure that the proposed requirements for greenways, cycle routes, strategic linking routes and infrastructure improvements are met to comply with policy LPA07? What would the mechanism within the required masterplan for 4HA be for deciding which land owner supplies land for works other than housing?

### MM013 - Infrastructure Delivery and Funding

What mechanisms are in place to ensure that the areas receiving the most harm, benefit from the resulting S106 compensation? It is vitally important that S106 compensation resulting from development on sites 4HA, 5HA, 1EA & 1ES stay within bold ward. We are of the belief that any development resulting in loss of habitat and green space within a ward should then entitle that ward to benefit entirely from any compensation arising. It is an ideal opportunity for much needed funding to be directed towards the forest park area to see the aims and objectives of the Bold Forest Park Area Action Plan come to fruition. This is also an opportunity for St Helens Borough Council to demonstrate its commitment to localism and inclusion.



### MM014 – Green Infrastructure

As 100% of sites 4HA, 5HA, 1EA & 1ES fall within the forest park boundary, mitigation of the harms of these developments will be difficult. Would it be possible for the council to rubber stamp any section 106 payments from these developments for implementing the aims and objectives of the BFPAAP?

### MM016 – Health & Wellbeing

The BFPAAP sets out improvements within the forest park that benefit the local community in terms of health and access to green spaces. Again, ringfencing of S106 compensation for the implementation of the improvements set out in the BFPAAP would benefit the local community greatly and ensure compliance with LPA11.

### MM018 – Bold Forest Garden Suburb LPA13

Section 1 – The development should deliver the following requirements...

#### Housing

A) There is no guarantee that at least 30% of the “affordable” housing will be delivered in accordance with policy LPC02. There are several examples of developments within St Helens that have failed to deliver on previous promises when developers have threatened to pull out due to the affordable housing element proving the site ‘unprofitable’.

What is the timescale for the robust evidence for the requirements of affordable housing given the development is expected to span more than 10 years?

B) Again, there is no certainty regarding the deliverability of 10% of the site’s energy through renewables contrary to St. Helens Borough Councils climate emergency declaration.

#### Design and layout

D) There is no reference to the KPI’s of the Bold Forest Park Area Action Plan.

E) The MM needs to make specific reference to bridleways as they have for walking and cycle routes as per the BFPAAP. Specific reference also needs to be made to Tunstall’s Farm with regards to existing businesses contained within sub-parcel GBP\_074\_C.

### Social Infrastructure

With reference to the GP surgery and the proposal to potentially relocate an existing surgery. The only other surgery in Bold ward is next to the Four Acre estate. How will the residents of Four Acre access the relocated surgery within site 4HA? How will the relocated surgery cope with an extra 3550 dwelling residents considering there is a severe shortage of GP's nationally. The Four Acre estate is one of the most deprived in the country as can be seen on the indices of deprivation, relocation of a vital community surgery would have a detrimental effect on some of the most vulnerable residents of Bold Ward. The four acre GP surgery is currently under special measures, increasing the numbers of patients will have a further detrimental effect on this community resource.

### Play, open space & green infrastructure

- I) The MM must not only reference policy LPA05.1 and be in accordance with the green infrastructure plan but also be in accordance with the BFPAAP and make specific reference to this. There also needs to be a provision for a biodiversity network within the forest park to prevent wildlife areas becoming stand-alone islands. This is specifically referenced in the BFPAAP.
- J) There again needs to be reference to the BFPAAP and specifically the existing and planned bridleways covering the areas.

### Landscape & biodiversity

- L) There needs to be an adequate biodiversity network to ensure wildlife area within the forest park do not become isolated.

### Access & Highways

There is no reference within the MM018 relating to J7 & J8 of the M62. The cumulative impact of the development in the area was discussed in great detail at the inquiry with the agreement that both junctions would require significant work to cope with the increased volumes of traffic. These would need to be completed before any development took place. Therefore, the improvements to the identified junctions must be considered as part of the overall master planning process.

## Reasoned justification

4.45.1 – This paragraph still contains reference to disused colliery buildings that were demolished in 2014. The paragraph also references “some limited areas containing trees and hedges”, these areas are EXTENSIVE covering LARGE areas of the site. Reference also needs to be made to the extensive pond and waterway networks that cover the site and have been highlighted in the BFPAAP.

Tunstall’s farm does not lie outside of the site boundary as suggested, the field network of the farm is wholly contained within sub-parcel GBP\_074\_C which was recommended for removal from the overall developable area in the greenbelt review stage 2B 2018.

4.45.2 – *“The Green Belt Review (2018) informed this allocation”* This review recommended the removal of sub-parcel GBP\_074\_C from the overall developable area but is still included in the overall plan. It should also make reference to the protection of Bold Forest Park and rural businesses.

4.45.3 – *“The Review concluded that the BFGS site as a whole should be allocated for development, noting that it “forms a notable indent in the alignment of the southern edge of the built-up area of St Helens”.* This comment is erroneous as the review concluded that sub-parcel GBP\_074\_C should be removed from the overall developable area.

4.45.3 - The guidance for the master planning process should also include the BFPAAP KPI’s and not just the objectives and policies.

## Housing

4.45.6 - There needs to be specific reference to the requirements of the masterplan to be completed prior to ANY development within the parcel.

4.45.8 - Highlights uncertainties in relation to uncertainty on the economic impacts of COVID-19 pandemic and supporting infrastructure required to deliver the site. Given the uncertainties and those mentioned earlier in the main modifications relating to the slowing of the take up rate, how will the council ensure the developments is completed in its entirety and not lead to a half-built suburb and infrastructure which would have a devastating impact on the surrounding earlier and Forest Park.

Would it not be more prudent to delay the start of any developments until it can be clearly demonstrated the site and infrastructure would be completed in full within a predefined time scale?

Alternatively, can the council explain what plan would be put in place if any of the infrastructure and development was to be delayed into the longer term?

## Master planning

4.45.15 - The paragraph makes reference to multiple landowners (ten). Some land is still in the ownership of local farmers. If the farmers or any other individual chooses not to sell the land will the Council, consider compulsory purchasing? This is something council leader David Baines said would not happen. What would be the mechanism to prevent fragmented developments containing little or no required infrastructure in this case?

### MM025

Sites 4HA, 5HA, 1EA & 1ES Are contrary to St. Helens Borough Councils climate emergency declaration. these areas contain wide open spaces used regularly by locals and visitors to the area providing strong health and wellbeing benefits. post development, the sites will provide little green space for identified use and massively restrict the tourist trails.

The reliance on fossil fuels of 3550 dwellings, giant warehouses and associated transportation will fundamentally change the area in terms of air quality. There is no guarantee that 10% of the sites energy needs can be delivered through renewable or low carbon sources contrary to policy LPC13.

### MM028

Post modification sites 4HA, 5HA, 1EA & 1ES will remain contrary to policy LPC09 through loss of natural and local environment.

### MM029

Sites 4HA, 5HA, 1EA & 1ES are contrary to policy LPC10 and St. Helens Borough Council's climate change emergency declaration. These sites contain aged woodlands and vast hedgerows that must be considered in any planning process.

### MM034

The development of sites 4HA, 5HA, 1EA & 1ES will fundamentally change the character of the ward by doubling the number of properties contained within and the character of bold Forest Park with open aspect views and farmland habitat.

There is also no guarantee that there will be no unacceptable harm caused to the amenities of the local and surrounding areas due to the uncertainties of this long-term development highlighted earlier.

## MM035

Section 7 should include reference to farmland habitats. Farmland birds have seen a decline of 55% since 1970 (Gov.uk).

## Conclusions

The main modifications have done nothing to address the concerns of the Bold and Clock Face Action Group in relation to the developments being allowed to commence with no guarantee the site and its promised infrastructure improvements will be realised in full. It's only serves to reinforce these concerns with specific reference being made by the council through the downturn in uptake of new builds and economic uncertainty. This would have a devastating impact on the local community and Bold Forest Park. The group ask again for a more prudent approach to be taken with site 4HA being safeguarded until this can be guaranteed. There has already been speculative planning application put forward to the council on 'safeguarded' land and land previously deemed unsuitable for development that are not included in the LPSD. These developments would remove the requirement for 510 dwellings to be built on site 4HA during this plan period and enable the master planning process to be completed with zero risk of a resulting fragmented development considering the previously mentioned uncertainties.

The Bold Forest Park Area Action Plan and the planned network of interconnecting green spaces bridleways and habitats fronts of all plans relating to 4HA and 5HA. There is insufficient reference to this within the main modifications and lack of guarantee these will be put in place.

[REDACTED]

---

**From:** Jodie Goulbourn [REDACTED]  
**Sent:** 08 January 2022 16:53  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Bold & Clock Face Action Group  
**Attachments:** Action group response to MM's.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 Sir or Madam,

I have read and fully endorse the attached report made by the "Bold & Clock Face Action Group".

Kind regards,  
Jodie Goulbourn  
The Lantern House  
9 Frenchfields Crescent  
Clock Face  
St Helen's  
WA9 4FZ

R00675

## Bold & Clock Face Action Group



This Representation is submitted on behalf of Bold and Clock Face Action Group, comprising 1600 members, in response to the St Helens Borough Local Plan 2020 – 2035 schedule of proposed main modifications. The group are primarily concerned with site allocations 4HA, 5HA, 1EA & 1ES in Bold ward.

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

**Bold and Clock Face Action Group.**



MM007 - support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.

Site 4HA is in direct conflict with policy LPA04 (Building a strong and stable economy) by removing established businesses such as Tunstall's Farm (Parcel GBP\_074\_C). There is no reference to rural established businesses and the impact of this site allocation within the main modifications.

Due to the land being under the ownership of TEN owners would the council be looking to compulsory purchase land owned by non-developers to ensure the parcel is completed in its entirety? There is no reference within the LPSD or the MM's as to how the council plan to handle this issue. There is a high risk of the parcel becoming fragmented leading to required infrastructure not coming forward. St Helens Borough Council Leader David Baines said regarding compulsory purchase...

"There will be no compulsory purchasing of land for housing in the local plan"

MM009 – page 32 section 42

"4.18.1 ... The requirement of 10,206 dwellings per annum set out in Policy LPA05 is designed to meet the full Objectively Assessed"

Incorrect figure quoted for dwellings per annum.

Section 4.18.26 talks about the parcels of land contained within site 4HA making a low to medium contribution to the greenbelt. The 2018 greenbelt review stage 2B states that parcel GBP\_074\_C is to be removed from the developable area and a buffer zone surrounding the parcel will be needed.

**CONCLUSIONS ON DEVELOPABILITY**

**Summary of Developability Assessment**

*Sub-parcel GBP\_074\_C is significantly covered by a LWS (Tunstall's Farm), therefore this area would be removed from the overall developable area and a buffer zone around the site would also be required to prevent harm from potential development.*

*Page 145 of St Helens Council Greenbelt review 2018 stage 2B*

Why has parcel GBP\_074\_C not been removed from the LPSD? There is no reference to this conclusion in the LPSD or MM's. The removal of this parcel would not only support and protect habitat and diversity specifically around the LWS site and act as a buffer but support the small rural business of Tunstall's Farm ensuring compliance with LPA04 and the aims and objectives contained within the Bold Forest Park Area Action Plan.

MM011 – Page 44 section 4.24.4

*“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, meaning that it is likely that post 2037, housing needs may be lower than between 2020 and 2037.”*

With reference to impacts on the economy due to the Covid19 pandemic and reduced housing requirements. This in conjunction with the projected reduction in household growth up to and after 2037 how will the council ensure that site 4HA will be delivered in its entirety and not be left with a fragmented parcel without sufficient infrastructure and services that will have a negative and damaging effect on local communities and the BFPAAP?

MM012

*“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.”*

Considering that Bold Ward is proposed to receive 3550 new dwellings, the Omega West extension (1400 FTE jobs) and further warehouses, why have the A roads in Bold been left out of the above improvements as part of the MRN in the main modifications? It makes sense that the area allocated almost half of the total housing and employment requirement within the LPSD would be top of the list for infrastructure improvements. Increased congestion following existing developments in the area and flooding are already a constant issue in Bold Ward with roads being closed several times per year due to flooding.



A569 Clock Face Road.

Section 1 – “Secure the delivery of new or improved road, rail, walking, cycling, and / or bus infrastructure where required;”

Considering the multiple landowners within site 4HA how will the council ensure that the proposed requirements for greenways, cycle routes, strategic linking routes and infrastructure improvements are met to comply with policy LPA07? What would the mechanism within the required masterplan for 4HA be for deciding which land owner supplies land for works other than housing?

### MM013 - Infrastructure Delivery and Funding

What mechanisms are in place to ensure that the areas receiving the most harm, benefit from the resulting S106 compensation? It is vitally important that S106 compensation resulting from development on sites 4HA, 5HA, 1EA & 1ES stay within bold ward. We are of the belief that any development resulting in loss of habitat and green space within a ward should then entitle that ward to benefit entirely from any compensation arising. It is an ideal opportunity for much needed funding to be directed towards the forest park area to see the aims and objectives of the Bold Forest Park Area Action Plan come to fruition. This is also an opportunity for St Helens Borough Council to demonstrate its commitment to localism and inclusion.

### MM014 – Green Infrastructure

As 100% of sites 4HA, 5HA, 1EA & 1ES fall within the forest park boundary, mitigation of the harms of these developments will be difficult. Would it be possible for the council to rubber stamp any section 106 payments from these developments for implementing the aims and objectives of the BFPAAP?

### MM016 – Health & Wellbeing

The BFPAAP sets out improvements within the forest park that benefit the local community in terms of health and access to green spaces. Again, ringfencing of S106 compensation for the implementation of the improvements set out in the BFPAAP would benefit the local community greatly and ensure compliance with LPA11.

### MM018 – Bold Forest Garden Suburb LPA13

Section 1 – The development should deliver the following requirements...

#### Housing

- A) There is no guarantee that at least 30% of the “affordable” housing will be delivered in accordance with policy LPC02. There are several examples of developments within St Helens that have failed to deliver on previous promises when developers have threatened to pull out due to the affordable housing element proving the site ‘unprofitable’.  
What is the timescale for the robust evidence for the requirements of affordable housing given the development is expected to span more than 10 years?
  
- B) Again, there is no certainty regarding the deliverability of 10% of the site’s energy through renewables contrary to St. Helens Borough Councils climate emergency declaration.

#### Design and layout

- D) There is no reference to the KPI’s of the Bold Forest Park Area Action Plan.
- E) The MM needs to make specific reference to bridleways as they have for walking and cycle routes as per the BFPAAP. Specific reference also needs to be made to Tunstall’s Farm with regards to existing businesses contained within sub-parcel GBP\_074\_C.

### Social Infrastructure

With reference to the GP surgery and the proposal to potentially relocate an existing surgery. The only other surgery in Bold ward is next to the Four Acre estate. How will the residents of Four Acre access the relocated surgery within site 4HA? How will the relocated surgery cope with an extra 3550 dwelling residents considering there is a severe shortage of GP's nationally. The Four Acre estate is one of the most deprived in the country as can be seen on the indices of deprivation, relocation of a vital community surgery would have a detrimental effect on some of the most vulnerable residents of Bold Ward. The four acre GP surgery is currently under special measures, increasing the numbers of patients will have a further detrimental effect on this community resource.

### Play, open space & green infrastructure

- I) The MM must not only reference policy LPA05.1 and be in accordance with the green infrastructure plan but also be in accordance with the BFPAAP and make specific reference to this. There also needs to be a provision for a biodiversity network within the forest park to prevent wildlife areas becoming stand-alone islands. This is specifically referenced in the BFPAAP.
- J) There again needs to be reference to the BFPAAP and specifically the existing and planned bridleways covering the areas.

### Landscape & biodiversity

- L) There needs to be an adequate biodiversity network to ensure wildlife area within the forest park do not become isolated.

### Access & Highways

There is no reference within the MM018 relating to J7 & J8 of the M62. The cumulative impact of the development in the area was discussed in great detail at the inquiry with the agreement that both junctions would require significant work to cope with the increased volumes of traffic. These would need to be completed before any development took place. Therefore, the improvements to the identified junctions must be considered as part of the overall master planning process.

## Reasoned justification

4.45.1 – This paragraph still contains reference to disused colliery buildings that were demolished in 2014. The paragraph also references “some limited areas containing trees and hedges”, these areas are EXTENSIVE covering LARGE areas of the site. Reference also needs to be made to the extensive pond and waterway networks that cover the site and have been highlighted in the BFPAAP.

Tunstall’s farm does not lie outside of the site boundary as suggested, the field network of the farm is wholly contained within sub-parcel GBP\_074\_C which was recommended for removal from the overall developable area in the greenbelt review stage 2B 2018.

4.45.2 – *“The Green Belt Review (2018) informed this allocation”* This review recommended the removal of sub-parcel GBP\_074\_C from the overall developable area but is still included in the overall plan. It should also make reference to the protection of Bold Forest Park and rural businesses.

4.45.3 – *“The Review concluded that the BFGS site as a whole should be allocated for development, noting that it “forms a notable indent in the alignment of the southern edge of the built-up area of St Helens”.* This comment is erroneous as the review concluded that sub-parcel GBP\_074\_C should be removed from the overall developable area.

4.45.3 - The guidance for the master planning process should also include the BFPAAP KPI’s and not just the objectives and policies.

## Housing

4.45.6 - There needs to be specific reference to the requirements of the masterplan to be completed prior to ANY development within the parcel.

4.45.8 - Highlights uncertainties in relation to uncertainty on the economic impacts of COVID-19 pandemic and supporting infrastructure required to deliver the site. Given the uncertainties and those mentioned earlier in the main modifications relating to the slowing of the take up rate, how will the council ensure the developments is completed in its entirety and not lead to a half-built suburb and infrastructure which would have a devastating impact on the surrounding earlier and Forest Park.

Would it not be more prudent to delay the start of any developments until it can be clearly demonstrated the site and infrastructure would be completed in full within a predefined time scale?

Alternatively, can the council explain what plan would be put in place if any of the infrastructure and development was to be delayed into the longer term?

## Master planning

4.45.15 - The paragraph makes reference to multiple landowners (ten). Some land is still in the ownership of local farmers. If the farmers or any other individual chooses not to sell the land will the Council, consider compulsory purchasing? This is something council leader David Baines said would not happen. What would be the mechanism to prevent fragmented developments containing little or no required infrastructure in this case?

### MM025

Sites 4HA, 5HA, 1EA & 1ES Are contrary to St. Helens Borough Councils climate emergency declaration. these areas contain wide open spaces used regularly by locals and visitors to the area providing strong health and wellbeing benefits. post development, the sites will provide little green space for identified use and massively restrict the tourist trails.

The reliance on fossil fuels of 3550 dwellings, giant warehouses and associated transportation will fundamentally change the area in terms of air quality. There is no guarantee that 10% of the sites energy needs can be delivered through renewable or low carbon sources contrary to policy LPC13.

### MM028

Post modification sites 4HA, 5HA, 1EA & 1ES will remain contrary to policy LPC09 through loss of natural and local environment.

### MM029

Sites 4HA, 5HA, 1EA & 1ES are contrary to policy LPC10 and St. Helens Borough Council's climate change emergency declaration. These sites contain aged woodlands and vast hedgerows that must be considered in any planning process.

### MM034

The development of sites 4HA, 5HA, 1EA & 1ES will fundamentally change the character of the ward by doubling the number of properties contained within and the character of bold Forest Park with open aspect views and farmland habitat.

There is also no guarantee that there will be no unacceptable harm caused to the amenities of the local and surrounding areas due to the uncertainties of this long-term development highlighted earlier.

## MM035

Section 7 should include reference to farmland habitats. Farmland birds have seen a decline of 55% since 1970 (Gov.uk).

## Conclusions

The main modifications have done nothing to address the concerns of the Bold and Clock Face Action Group in relation to the developments being allowed to commence with no guarantee the site and its promised infrastructure improvements will be realised in full. It's only serves to reinforce these concerns with specific reference being made by the council through the downturn in uptake of new builds and economic uncertainty. This would have a devastating impact on the local community and Bold Forest Park. The group ask again for a more prudent approach to be taken with site 4HA being safeguarded until this can be guaranteed. There has already been speculative planning application put forward to the council on 'safeguarded' land and land previously deemed unsuitable for development that are not included in the LPSD. These developments would remove the requirement for 510 dwellings to be built on site 4HA during this plan period and enable the master planning process to be completed with zero risk of a resulting fragmented development considering the previously mentioned uncertainties.

The Bold Forest Park Area Action Plan and the planned network of interconnecting green spaces bridleways and habitats fronts of all plans relating to 4HA and 5HA. There is insufficient reference to this within the main modifications and lack of guarantee these will be put in place.



[REDACTED]

---

**From:** John Goulbourn [REDACTED] >  
**Sent:** 12 January 2022 23:03  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Fwd: Bold & Clock Face Action Group  
**Attachments:** Action group response to MM's.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 Sir or Madam,

I have read and fully endorse the attached report made by the “Bold & Clock Face Action Group”.

Kind regards,  
John Goulbourn

The Lantern House  
9 Frenchfields Crescent  
Clock Face  
WA9 4FZ

**RO0689**

### Local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:58

B Barry [redacted]  
Thu 13/01/2022 16:58  
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.

Mrs C Greenall  
219d Liverpool Road  
Haydock  
WA119RX

I agree with all the comments made by RAFFD and GRAG with respect to the local plan.

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

**RO0690**

[REDACTED]

---

**From:** Barry <[REDACTED]>  
**Sent:** 12 January 2022 21:22  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** Local Plan MM

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.

Mr B Greenall  
219d Liverpool Road  
Haydock  
WA119RX

I support the comments made by RAFFD and GRAG with respect to the Local Plan.

**RO0702**

[REDACTED]

---

**From:** Denise Griffiths <[REDACTED]>  
**Sent:** 12 January 2022 21:04  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** HS2 final submission

**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 fully endorse the action of ECRA and their statements which oppose the main modifications of the local plans and oppose plans to release greenbelt land to provide additional housing. I do this because I am not convinced that all brownfield sites have been considered for use before releasing precious agricultural land. This flies in the face of the current national concerns regarding reduction of wildlife habitats and the impact of climate change. Additionally, I have grave concerns regarding road access to this area which, I understand, potentially involves roundabout access on A580 by Houghtons Lane. This is now an incredibly busy thoroughfare with heavy goods traffic much increased and inevitably will result in greater congestion and the potential for accidents. This land should not be released from the greenbelt at this time.

Yours sincerely,  
Denise Griffiths

41 Prestbury Dr, Eccleston, Saint Helens WA10 5RB,  
[REDACTED]

**RO0704**



[REDACTED]

---

**From:** Sean Grimes [REDACTED]  
**Sent:** 06 January 2022 18:27  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** Objection of green belt land

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, sean grimes endorse the findings of the bold and clock face action group

Warm regards  
Sean grimes

Sent from my iPhone

R00732

**From:** Joanne Harding <[REDACTED]>  
**Sent:** 12 January 2022 10:29  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** HBF response to St Helens Borough Local Plan Main Modifications Consultation  
**Attachments:** 22-01-13 HBF St Helens Main Modifications.docx; HBF representation-form-final.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**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 Planning Policy Team,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Main Modifications.

It would be greatly appreciated if you could confirm receipt of this response.

If you require any further information, or have any queries, please feel free to get in touch at the details below.

Kind regards

**Joanne Harding MRTPI**  
Planning Manager – Local Plans North  
Home Builders Federation

T: [REDACTED]

E: [REDACTED]

---

**From:** planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>  
**Sent:** 18 November 2021 12:40  
**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](http://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](mailto:planningpolicy@sthelens.gov.uk)  
Website: <https://www.sthelens.gov.uk/planning-building-control/planning-policy/>



"This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed. It may contain privileged information. Any unauthorised review, use, disclosure, distribution or publication is prohibited. If you have received this e-mail in error please contact the sender by reply e-mail and destroy and delete the message and all copies from your computer. The information contained in this email may be subject to public disclosure under the Freedom of Information Act 2000 or other legal duty. Any views or opinions expressed within this email are those of the author and may not necessarily reflect those of the Authority. No contractual arrangement is intended to arise from this communication."

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



SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
18/01/2022

Dear Planning Policy Team,

### **ST HELENS LOCAL PLAN: MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the St Helens Local Plan Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments on the proposed Main Modifications.

#### **MM001: References to 2035**

4. The Council propose to amend the Plan period to 2020 to 2037 rather than 2035, to ensure a 15-year plan period on adoption of the Plan. The HBF considers that this is an appropriate modification.

#### **MM009: Policy LPA05**

5. The Council propose to increase the overall housing requirement from 9,234 to 10,206 for the period from 2016 to 2037 due to the extension of the Plan period. The HBF considers that it is appropriate to extend the Plan period and as such to increase the overall housing requirement to reflect that. However, the HBF continues to be concerned that the 486dpa does not reflect the evidence particularly in relation to economic development. The HBF considers that given the evidence contained within the SHMA, the SHELMA, the ELNA, the Liverpool City Region Growth Strategy and Growth Deal and the previous delivery of homes that the Council should include an uplift in the housing figure above that provided by the Standard Methodology and above that currently proposed. Therefore, the HBF does not consider that this modification is sound.

#### **MM021: Policy LPC01**

6. The Council propose some minor amendments to part 1 of this policy to improve clarity and consistency with the NPPF. The HBF continues to recommend a flexible approach



is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF considers that the addition of 'up to date' relevant evidence is an improvement, but the policy could still be improved by highlighting that other evidence would also be considered appropriate such as information related to site characteristics, viability, and local aspirations.

7. The Council propose to amend this policy in relation to the M4(2) and M4(3) requirements for clarity. The HBF does not consider that the current proposal improves the clarity of the policy and the HBF continues to have concerns around the justification of this policy and does not consider that the Council has provided sufficient evidence to justify the requirements that have been set.
8. If the Council intends to retain this policy the HBF proposes the following amendment would improve the clarity and clearly set out what the Council require in relation to the wheelchair adaptable dwellings:
  - 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); and*
  - 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)(2)(a).*
9. The HBF also considers that the policy needs to reflect the requirements of the PPG. So additional text should be added which states that:  
*The Council will also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M will be applied.*
10. The HBF supports the Council in deleting the requirement for at least 5% of new homes on greenfield sites to be bungalows, and agree that the requirement was not justified in terms of need or viability.
11. The HBF supports the amendment to the reasoned justification paragraph 6.3.8 to include a 12 month transitional period from the adoption of the Plan in relation to the M4(2) and M4(3) requirements.

### **Future Engagement**

12. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
13. The HBF would like to be kept informed of the publication of the Inspectors Report and the adoption of the Plan. The HBF would also like to continue to receive information in relation to any other forthcoming consultations in relation to the Local Plan and

associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Joanne Harding**  
**Planning Manager – Local Plan (North)**

Email: [Redacted]

Phone: [Redacted]



**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 13<sup>th</sup> 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.

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

<b>Signature:</b> [REDACTED]	<b>Date:</b> 12/01/2022
------------------------------	-------------------------

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 13<sup>th</sup> 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](mailto: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](mailto: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](http://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

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.

Please see separately attached letter.

Please continue on a separate sheet if necessary

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation.

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

R00738

**From:** Peter Harris [REDACTED]  
**Sent:** 09 January 2022 11:03  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** St.Helens Local Plan Main Modifications response

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 wish to endorse and support the issues raised and objections in the contents of the report commissioned by the St.Helens Green Belt Association (SHGBA), and to add that the building on Green Belt land is unnecessary as St.Helens has sufficient brownfield land to meet the town's recognised and projected needs for the foreseeable future.

And further, in para 4.24.18, with reference to 'Land South of A580 between Houghtons Lane and Crantock Grove, Windle in the St.Helens Local Plan Main Modifications, (SHLPMM) there appear to be some contradictions. On the one hand, the SHLPMM states that the site 8HS makes a 'low overall contribution to the Green Belt, with a medium development potential' and then goes on to say, 'the site comprises a significant greenfield site that forms a sizeable outward extension of the urban area into the countryside' A 'low overall contribution to Green Belt' and 'a significant greenfield site' are contradictory statements which require some clarification. If we take the latter point, i.e. 'a significant greenfield site', it demonstrates a flawed argument in the 'exceptional circumstances' case of the SHBC. By conceding this as a 'significant greenfield site' it supports a number of the Green belt tenets namely, that site 8HS checks unrestricted sprawl of a large built up area, it assists in safeguarding the countryside from encroachment and also assists in urban regeneration by encouraging the recycling of derelict and other urban land.. This last point is particularly appropriate for a town like St.Helns, ravaged as it was in the 19th and early 20th centuries by indiscriminate dumping of industrial waste, the remains of which we can still see today in areas of the town

I respectfully offer these comments for your consideration.

Sincerely, Peter Harris, 44, Crantock Grove, Windle, St.Helns WA10 6EJ

R00739

**From:** Carol Harris [REDACTED]  
**Sent:** 11 January 2022 13:29  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** St.Helens Local Plan Main Modifications Response

**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 wish to endorse the issues raised and objections made in the contents of the report commissioned by the St.Helens Green Belt Association. Building on the Green Belt is unnecessary as St.Helens has sufficient brownfield land to meet the town's projected needs for the foreseeable future. Conceding in the Local Plan Main Modifications that site 8HS is a 'significant greenfield site', reveals a flaw in the 'exceptional circumstances' argument as this site supports a number of the main aims of the Green Belt rationale, viz, a check on unrestricted sprawl of urban areas, a safeguard to the countryside from urban encroachment and a catalyst to urban regeneration by encouraging the recycling and remediation of derelict land. This last point has particular relevance for a town like St.Helens with its still unremediated areas of derelict and 'spoiled' land.

Please consider these comments when you come to a measured judgement on the Local Plan Modifications

Yours sincerely,

Mrs.Carol Harris, 44,Crantock Grove, Windle, St.Helens. WA10 6EJ

R00759



## **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 13<sup>th</sup> 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.

<b>1. Your Details</b>	<b>2. Your Agent's Details (if applicable)</b> (we will correspond via your agent)
Title: Ms	Title:
First Name: Frances	First name:
Last Name: Harrop	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:

11/01/2022

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 13<sup>th</sup> 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](mailto: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](mailto: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](http://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.**

R00775

[REDACTED]

---

**From:** Planning St Helens  
**Sent:** 10 January 2022 09:30  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Fw: I Object against planning on Greenbelt land Bold and Clockface

Morning,

Looks like this is a local plan objection.

Thanks

[REDACTED]

---

**From:** David Hawley [REDACTED]  
**Sent:** 09 January 2022 19:14  
**To:** Planning St Helens <Planning@sthelens.gov.uk>  
**Subject:** I Object against planning on Greenbelt land Bold and Clockface

**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.

David Hawley  
11 Andromeda way  
New Bold  
St Helens  
Merseyside  
WA9 4ZQ  
[REDACTED]

Hello,

I object to the main modifications of the local plan, and I endorse the Bold and Clockface action group findings.

Thanks

David Hawley

Get [Outlook for Android](#)

R00793



**From:** [REDACTED]  
**Sent:** 11 January 2022 19:26  
**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 or Madam

I am objecting to the proposed plan regarding building on unnecessary Greenbelt.  
St Helens has sufficient Brownfield land to meet the recognised needs for the foreseeable future.

All Brownfield sites should be exhausted first.

The need for improvements to local infrastructure ie

Schools, Doctors Surgeries, Traffic and Noise pollution should be addressed. Importantly affordable homes should be included.

We have intolerable problems with traffic as roads are not fit for purpose, we need real and workable solutions for these problems.

It's essential that the local people are given the opportunity to have their say on the future.  
Councillors and Inspectors should ensure the views of the local people are fully represented.

I support all comments of

RAFFD

GRAG

Kind regards

Patricia Hendriksen  
21, Wyedale Road  
Haydock  
St Helens  
Wa11 0hn  
Tuesday 11th January 2022

Sent from my Galaxy

**R00817**

[REDACTED]

---

**From:** Christopher Hill [REDACTED]  
**Sent:** 10 January 2022 20:27  
**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.

Chris Hill, 11 Girvan Cres, Garswood, Nr Wigan WN4 0SS

I am support of the comments made by the action groups GRAG and RAFFD in regard to comments about the main modifications to the local plan.

C Hill

**RO0818**

**From:** Wendy Hill <[REDACTED]@[REDACTED].com>  
**Sent:** 11 January 2022 18:46  
**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.

Wendy Hill  
11 Girvan Crescent  
Garswood  
Near Wigan  
WN4 0SS

I write in support of points put forward by both RAFFD and GRAG in relation to the main modifications in the local plan. In addition:

It is believed the plan is unsound as it is not based on conclusive and vigorous evidence and needs modification.

The amount of land being advised as being needed for development is overstated, there are no exceptional circumstances that warrant changing greenbelt boundaries as previously developed land, brownfield and contaminated land have not been thoroughly examined. The greenbelt reviews are erratic and partisan. Economic hypotheses are over-stated.

The main modifications do not adequately allay fears in relation to developments 1HA and 1HS as until there is guaranteed social infrastructure/infrastructure improvements. Without guarantees the impact on the local community would be catastrophic.

The 'renewed focus on a brownfield-first policy' – identification and remediation of brownfield/contaminated land over the plan period would negate the need for safeguarded land for development and no exceptional circumstances to remove land from the green belt.

'Suitable' greenbelt sites have been selected on the basis that the land parcels are 'well contained with strong boundaries'. That is not an exceptional circumstance and reason to remove from the green belt. Reasons given for safeguarded land are inconsistent.

MM06 page 17 point 5 and page 22 point 10

– object to the need to release of green belt land and identification of safeguarded land is unnecessary.

MM09

page 47 point 4/18/23

- object to the need to release of green belt land and identification of safeguarded land is unnecessary.

Page 4/18/24

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">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.

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">

### **1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood**

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">The perceived benefits of development are over-egged and object and reject the statement that **'The Sustainability Appraisal (SA) found development of the site would result in a high number of positive effects.'** As "Times New Roman";mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">'within walking distance of a local shop' – much of the area has pavements/safe walking routes are on only one side of the road. 'Transport links' 156 bus service diverted to accommodate the Florida Farm development – making journey times much longer and less frequent now one per hour. 157 bus service one per hour no early or late availability (0940-1744 hours). Train service 1 per hour – no access to Liverpool bound platform for those with mobility issues due to 56 stairs, 4 landings, a bridge and no lift. No proposed additional social infrastructure: doctors – already has a waiting list and not accepting new patients due in part to the national shortage of GPs, there is no dentist in the area, school places, etc. Effects of GMR Clean Air Zone are as yet unknown as being on the extremity of the borough and abutting GMR the area is likely to become even more busier as traffic tries to find ways around the charges. This has not been taken into account.

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">MM011 page 50 onwards 1, 2, 4.24.2

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">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.

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">

MM011 4.24.10

**1HS – Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood**

No removal from the greenbelt, as circumstances not exceptional and not a logical extension. Medium development potential share same comments as 1 HA mso-fareast-font-family:"Times New Roman";mso-ansi-language:EN;mso-fareast-language:

EN-GB" lang="EN">'within walking distance of a local shop' – much of the area has pavements/safe walking routes are on only one side of the road. 'Transport links' 156 bus service diverted to accommodate the Florida Farm development – making journey times much longer and less frequent now one per hour. 157 bus service one per hour no early or late availability (0940-1744 hours). Train service 1 per hour – no access to Liverpool bound platform for those with mobility issues due to 56 stairs, 4 landings, a bridge and no lift. No proposed additional social infrastructure: doctors – already has a waiting list and not accepting new patients due in part to the national shortage of GPs, there is no dentist in the area, school places, etc. Effects of GMR Clean Air Zone are as yet unknown as being on the extremity of the borough and abutting GMR the area is likely to become even more busier as traffic tries to find ways around the charges. This has not been taken into account.

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">

MM011

4.24.4

Impacts on the economy due to C19 pandemic and reduced housing requirements, in conjunction with the projected reduction in household growth up to and after 2037. With regard to site 1HA unless the site is built out in its entirety, there will be insufficient social infrastructure which will put pressure on already burgeoning local community infrastructure.

mso-ansi-language:EN;mso-fareast-language:EN-GB" lang="EN">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.

bold" lang="EN"> bold">

MM034 page 140

The development of sites 1HA, 1HS will change the character of the ward with open aspect views and farmland habitat lost.

MM035 page 144

Section 7 there is no specific reference to farmland habitats, this must be included. Farmland birds have seen a 55% decline 1970. 1HA is known and recorded as being a breeding ground for Lapwing among other species.

The main modifications do not adequately allay fears in relation to developments 1HA and 1HS as until there is guaranteed social infrastructure/infrastructure improvements. Without guarantees the impact on the local community would be catastrophic. Safeguarded site 1HS already has a planning application to refurbish derelict barns, an attempt try to accelerate an end to the safeguarded status.

regards

```
/* Style Definitions */  
table.MsoNormalTable  
{mso-style-name:"Table Normal";  
mso-tstyle-rowband-size:0;  
mso-tstyle-colband-size:0;  
mso-style-noshow:yes;  
mso-style-priority:99;  
mso-style-parent:"";  
mso-padding-alt:0cm 5.4pt 0cm 5.4pt;  
mso-para-margin-top:0cm;  
mso-para-margin-right:0cm;  
mso-para-margin-bottom:8.0pt;  
mso-para-margin-left:0cm;  
line-height:107%;  
mso-pagination:widow-orphan;  
font-size:11.0pt;  
font-family:"Calibri",sans-serif;  
mso-ascii-font-family:Calibri;  
mso-ascii-theme-font:minor-latin;  
mso-hansi-font-family:Calibri;  
mso-hansi-theme-font:minor-latin;  
mso-bidi-font-family:"Times New Roman";  
mso-bidi-theme-font:minor-bidi;  
mso-fareast-language:EN-US;}
```



**RO0820**

**From:** [REDACTED]  
**Sent:** 07 December 2021 21:30  
**To:** [REDACTED]  
**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**

Mike

**Last Name**

HINDLEY

**Organisation/company**

**Address**

39 Laurel Drive

**Postcode**

WA10 5JB

**Telephone Number**

**Mobile Number**

**Email Address**

**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.)**

No

**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 consideration for the impact on nature, wildlife and natural environment clearly has not been taken into account. Processes for evaluating the impact on wildlife cannot have effectively been performed with these being in draft form. Similarly, sightings of rare wildlife on the proposed land should be cause to protect this land from development. Evidence of a thorough and correct environmental and wildlife survey needs to be provided to fully justify removing a habitat for rare wildlife.

**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**

**R00836**

[REDACTED]

---

**From:** Paul Hooton [REDACTED]  
**Sent:** 11 January 2022 08:39  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Local Plan  
**Attachments:** Reps Re Main Mods to Local Plan v 5.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.

Good morning,  
With regards to the Local Plan Modifications consultation, I support the comments made by RAFFD and GRAG.  
Please see attached document.

Regards,  
Paul Hooton  
56 Avondale Road  
WA11 0HJ

[REDACTED]

# **Residents against the Florida Farm Developments (RAFFD) & Garswood Residents Action Group (GRAG)**

## **Comments on the proposed Main Modifications to the St Helens Local Plan**

RAFFD was started on 1 June 2016 as Residents against the Florida Farm Development, to object to the planning application by Bericote Properties Ltd to construct warehouses on approximately 91 acres of Greenbelt at Florida Farm North, Haydock.

In November of that year, when details of the St Helens Local Plan were released the name was changed to Residents against the Florida Farm Developments to reflect our opposition to proposed housing at Florida Farm South and to Greenbelt Development throughout the Borough.

GRAG was also set up in November 2016 in response to the proposals in the St Helens Local Plan.

The combined Groups have a membership of approximately 1900.

We have read the responses to the Main Modifications made on behalf of the St Helens Green Belt Association (SHGBA), Bold and Clock Face Action Group, and ECRA and fully support those responses.

**To save the Inspectors having to read the same comments twice this document should be read as an Appendix to the St Helens Green Belt Association submission with reference to the specific sites detailed below.**

These comments are in respect of proposed developments within the existing Wards of Blackbrook and Haydock and the Garswood area of the Billinge and Seneley Green Ward.

Employment allocations 4EA, 5EA, 6EA.

Housing Allocations 1HA, 2HA and 1HS.

The document indicates the Main Modification Reference together with a copy of the St Helens Borough Council proposal and then details the response..

## **General Comments**

It is believed the Local Plan is unsound as it is not based on conclusive and vigorous evidence and needs modification.

The amount of land being advised as being needed for development is overstated, there are no exceptional circumstances that warrant changing Greenbelt boundaries as previously developed land, Brownfield and contaminated land have not been thoroughly examined. The Greenbelt reviews are erratic and partisan. Economic hypotheses are over-egged.

The Main Modifications do not adequately allay fears in relation to developments 1HA and 1HS until there is guaranteed social infrastructure/infrastructure improvements. Without guarantees the impact on the local community would be catastrophic

The 'renewed focus on a Brownfield-first policy' – identification and remediation of Brownfield/contaminated land over the plan period would negate the need for safeguarded land for development and no exceptional circumstances to remove land from the Greenbelt have been proved.

'Suitable' Greenbelt sites have been selected on the basis that the land parcels are 'well contained with strong boundaries'. That is not an exceptional circumstance and reason to remove from the green belt.

Reasons given for safeguarded land are inconsistent.

## **Site Specific comments**

### **Reference - MM007**

### **Employment land allocations**

#### **Site - 4EA – Land south of Penny Lane, Haydock**

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. 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.

#### **Comment by RAFFD & GRAG**



This site is adjacent to a major tourist destination in Haydock, ie the Mercure Hotel and is in very close proximity to Haydock Park Racecourse.

The hotel has already suffered badly from the inappropriate development of the Briggs Plant Hire Company to the immediate West of its grounds, not what was envisaged for the site by the glossy brochure issued by the developer for what is known as Empress Park.

This parcel of land should be deleted from the proposals and should remain as part of the Greenbelt.

### **Site - 5EA – Land to the West of Haydock Industrial Estate, Haydock**

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.

### **Comment by RAFFD & GRAG**

This parcel of land, together with 6EA below and the already developed Florida Farm North constitute an area of some 160 acres (65 hectares). It is difficult to understand how an area of this size in a rural location can be classified as only having a medium contribution to the Greenbelt. The whole area should have been looked at as one and not divided into smaller parcels.

An application to develop this land for warehousing was rejected by the Council on 23 July 2019 as being inappropriate development within the Greenbelt. Only three members of the Planning Committee voted in favour of granting the application and the developer did not appeal the decision. The developer was so confident that ■■■ application would be granted that prior to the planning committee hearing, and without planning permission, ■■■ erected a sign stating that the warehouses would be coming soon.

Some two and a half years later that illegal sign is still on the site despite complaints being made about it and the Council stating that they would take enforcement action.

### **6EA – Land West of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock**

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 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

### **Comment by RAFFD & GRAG**

The first paragraph of the comments about site 5EA above also applies to this proposal. There don't appear to be any concrete proposals as to how this site would be accessed and in the past there have been woolly comments about a link road from Liverpool Road to Haydock Lane through this site and site 5EA above.

Should these sites remain in the Local Plan and subsequent planning permission is granted see my comments later in respect of planning and highways agreements to mitigate the effects of these two developments and the need for the council to manage and monitor the construction in a way that causes the least disruption to residents and highway users.

## **Housing Land allocations**

### **Reference - MM010**

### **1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood**

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.

### **Comment by RAFFD & GRAG**

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 perceived benefits of development are over-egged and we object and reject the statement that 'The Sustainability Appraisal (SA) found development of the site would result in a high number of positive effects.'

As far as the comment about '**within walking distance of a local shop**' – much of the area has footways/safe walking routes on only one side of the road.

### **'Transport links'**

The 156 bus service was diverted to accommodate the Florida Farm development – making journey times much longer and less frequent now at one per hour

157 bus service is one per hour no early or late availability (0940-1744 hours).

Train service is one per hour – no access to Liverpool bound platform for those with mobility issues due to 56 stairs, 4 landings, a bridge and no lift.

No proposed additional social infrastructure: doctors – already has a waiting list and not accepting new patients due in part to the national shortage of GPs, there is no dentist in the area, school places, etc.

Effects of Greater Manchester Clean Air Zone are as yet unknown as being on the extremity of the borough and abutting Greater Manchester, the area is likely to become even busier as traffic tries to find ways around the charges. This has not been taken into account.

Should this site remain in the Local Plan then the Highways Service needs to ensure by way of Section 278 Highways Act Agreement that adequate footways are provided in the vicinity of the development and elsewhere in Garswood as there are many highways that only have a footway on one side.

There should also be a provision for a substantial contribution towards the upgrade of Garswood Station, including the provision of a lift.

## **2HA – Land at Florida Farm (South of A580), Slag Lane, Blackbrook**

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 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.

### **Comment by RAFFD & GRAG**

It is difficult to see how this land, consisting of some 57 acres (23.19 hectares) of farmland in this semirural location, could warrant a description of having a "low overall contribution to the Greenbelt". Having strong, permanent boundaries is not an exceptional circumstance for the removal of land from Greenbelt.

The proposal for yet another left off/left on access on the A580, a high speed highway is an accident waiting to happen, particularly as it is in close proximity to the 4-way junction at Haydock Lane. Vehicles can be held at these lights for lengthy periods and we have experienced at first hand the speeds that some vehicles attain as they race away from the hold up. The Highways Service should ensure, by way of a Section 278 Agreement, that the developer makes a 100% contribution towards the costs of introducing a 40 mph speed limit along this length of the A580, if it has not previously been introduced.

They should also ensure that they receive adequate funding via the Section 278 Agreement to mitigate the effect of this development on the existing highways network, including a commuted sum for the culvert that will be required at the junction of Vicarage Road/Liverpool Road and a sum to cover any contingencies that may arise.

Having experienced the problems caused on the A580 and surrounding highways during the Construction of the Florida Farm North warehouses it is imperative that the Council carefully monitors the site during the initial construction phase of the main access at the junction of Vicarage Road and Liverpool Road, in particular by ensuring that an adequate wheel wash system is installed and used. A rumble strip and a fleet of road sweeping vehicles spreading mud like buttering bread, is **NOT** an acceptable method.

The Council should also address the need for social infrastructure such as doctors and dentists and in particular school placements.

### **Housing safeguarded sites**

## **Reference MM011**

### **1HS – Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood**

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 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.

## **Comment by RAFFD & GRAG**

We agree with the comments of the St Helens Green Belt Association at MM006 Section 5. Greenbelt release and the identification of Safeguarded land is not necessary.

## **Reference MM034**

All proposals for development will be expected, as appropriate having to their scale, location and nature, to meet or exceed the following requirements:-

- 1.a) Maintain or enhance the character and appearance of the local environment ...
- b) avoid causing unacceptable harm to the amenities of the local area ...

## **Comment by RAFFD & GRAG**

In respect of Garswood the development of the sites 1HA and 1HS will change the character of the village with the loss of open aspect views and farmland habitats.

In respect of site 4EA – land south of Penny Lane, the proposed development will cause unacceptable harm to the amenities of the Mercure Hotel.

R00854

[REDACTED]

---

**From:** Hrycan, Emily [REDACTED]  
**Sent:** 03 December 2021 15:04  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Main modifications consultation response - Historic England  
**Attachments:** PL00536899\_Sthelens\_MainMods\_Dec21.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.

Please find attached a letter.

Emily Hrycan  
Historic Environment Planning Adviser (North West)  
Development Advice  
Historic England  
[REDACTED]

[REDACTED]

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://historicengland.org.uk/strategy).

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.



By email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Our ref: PL000536899  
Your ref:

Date: 8 September  
2021

Dear Sir/Madam

### **St Helens Borough Local Plan Submission Draft: – Main modifications consultation**

Thank you for consulting Historic England on the above document.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We have the following comments to make:

#### **MM017, Parkside West**

Historic England objects to the proposed amendment. The Council has undertaken a series of heritage impact assessments to support the inclusion of the sites in the plan, it is expected that the policies include reference to these to tie in their recommendations and design requirements. This will ensure that the sites can be developed without harm to the historic environment, in line with the requirements of the NPPF.

**Proposed change:** Therefore, it is recommended that an additional line should be included in Para 4.40 2e, which states, *development will be in accordance with the mitigation measures outlined in the Council's Heritage Impact Assessment (2020).*

#### **MM030, LPC11**

Historic England objects to the proposed deletion of reference to less than substantial harm. Without reference to this, the Plan puts at risk the future of the Borough's heritage assets. The Plan will only cover substantial harm and will therefore provide no framework to manage applications which are less than substantial

**Proposed change:** Retain Paragraph 4 on less than substantial harm.

#### **Annex 1 – Appendix 5: Site Profiles**

Historic England objects to the proposed amendments to the site-specific profiles. The Council has undertaken a series of heritage impact assessments to support the inclusion of the sites in the plan, it is expected that the policies include reference to these to tie in their recommendations and design requirements. This will ensure that the sites can be developed without harm to the historic environment, in line with the requirements of the NPPF.





**Proposed change:** Therefore, it is recommended that where relevant, an additional line should be included which states, *development will be in accordance with the mitigation measures outlined in the Council's Heritage Impact Assessment.*

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

**Emily Hrycan**

Historic Environment Planning Adviser (North West)

Historic England

[REDACTED]



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

[REDACTED] [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



R00858

[REDACTED]

---

**From:** Linda Howe [REDACTED]  
**Sent:** 11 January 2022 08:37  
**To:** [planningpolicy@sthelens.gov.uk](mailto: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.

Apologies, I missed off my name on previous email

Local Plan

With reference to the local plan to allow building over green belt land, I am in total agreement with the comments made by the Garswood Residents Action Group and Residents against the Florida Farm Developments.

The roads are already heavily congested and vehicles are taking alternate routes on minor roads because there are usually queues of traffic going into Ashton from all directions.

The onus should be to use brownfield sites for any new development rather than destroy our green spaces.

The development planned in Garswood would be totally inappropriate. The infrastructure is totally inadequate. There is just one GP practice that has a waiting list, there is no dentist in Garswood, and just one school. Public transport is unreliable and the train station is totally unsuitable for people with a disability as there is no lift.

Hopefully, the plans to build over the green belt will be rejected as it will be in total contravention of any policy to control climate change.

Linda Howe  
203 Garswood Road  
Ashton in Makerfield  
Wigan  
Lancs  
WN4 0XS

R00859

[REDACTED]

---

**From:** Ann-Veronica Howitt [REDACTED]  
**Sent:** 08 January 2022 17:42  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** Eccleston Park Golf course

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 note I completely endorse the report and objections of St Helens Green Belt Association to this planning application.

I sincerely hope that due weight is given to residents concerns.

Regards  
A V Howitt  
L35 6NG

**RO0860**

[REDACTED]

---

**From:** Sarah-Jane Howitt [REDACTED]  
**Sent:** 05 January 2022 15:02  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Green Belt Main Modification Consultation response

**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

As part of the Main Modification Consultation process, I would like to reiterate my objection to the planned release of green belt land to safeguard for development in St Helens.

I endorse all the issues raised in the report commissioned by St Helens Green Belt Association and submitted as part of this consultation process. Any building on Green Belt land in St Helens is entirely unnecessary as St Helens has sufficient Brownfield land to meet our recognised development needs for the foreseeable future.

Kind regards  
Sarah-Jane Howitt

17 Brooklands Road  
Eccleston  
St Helens  
WA10 5HE

**Please note that our central postal address for all offices is 100 Old Hall Street, Liverpool, L3 9QJ.**

Please consider our environment and send correspondence by email where possible. Only if absolutely necessary send correspondence by hard copy. Also consider whether you need to print this message.

We will accept service of proceedings electronically if proceedings are sent to [serviceofproceedings@weightmans.com](mailto:serviceofproceedings@weightmans.com)

"Weightmans" is the collective name under which Weightmans LLP and Weightmans (Scotland) LLP provide legal and other services to clients.

Weightmans LLP is a limited liability partnership registered in England & Wales with registered number OC326117 and its registered office at 100 Old Hall Street, Liverpool L3 9QJ. A full list of members is available at the registered office. The term "partner", if used, denotes a member of Weightmans LLP or a senior employee of Weightmans LLP with equivalent standing and qualifications. Authorised and regulated by the Solicitors Regulation Authority. This email is CONFIDENTIAL and LEGALLY PRIVILEGED. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error. More information about Weightmans LLP can be found at [www.weightmans.com](http://www.weightmans.com) including details of all members.

## **Fair Processing Notice**

Weightmans process personal data for the purposes of our business in providing our services and as part of the claims resolution process and/or in connection with assisting detection/ prevention of fraud. We also process personal data in anonymised form for statistical and/or insurance and/or legal advice purposes. For further information about how Weightmans process data please see our website privacy notice at [www.weightmans.com/privacy-notice](http://www.weightmans.com/privacy-notice)

## **Cyber crime and fraud alert**

Please be aware that we do not send notifications of changes to our bank details by email. Fraudsters have been impersonating law firms and some clients of law firms have been tricked into forwarding monies to them. If you receive an email that appears to come from us, providing different bank details to the ones we supplied at the outset of the matter or indicating a change in our bank details, please contact the fee earner dealing with your matter by telephone immediately. Do not reply to the email or act on any information contained in it. We will not accept responsibility if you transfer money into an incorrect account. Nothing in this email can be considered to create a binding contract

## **Terms and conditions of business**

Our standard terms of business apply to every retainer we enter into. They can be accessed on our website at [www.weightmans.com/media/3795/tcs-10-2-21.pdf](http://www.weightmans.com/media/3795/tcs-10-2-21.pdf)



R00892

**From:** craig hunt [REDACTED]  
**Sent:** 07 January 2022 08:42  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** Bold and Clockface Action Group

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**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 have read through their findings and found them to be valid I agree with the action groups response

[Sent from Yahoo Mail for iPhone](#)

**RO0911**

Our Ref: MV/ 15C100009

13 January 2022

St. Helens Borough Council  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**via email only**

Dear Sir / Madam

**Local Plan Submission Draft: Schedule of Proposed Main Modifications Consultation  
November 2021 – January 2022  
Representations on Behalf of National Grid Land and Property**

National Grid Land and Property has appointed Avison Young to provide town planning advice with respect of the non-operational land portfolio owned by National Grid Electricity Transmission Plc. We are instructed by our client to submit the following representation with regard to the current consultation.

### **The Site**

National Grid owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid also own land, which is non-operational, usually land adjacent to operational equipment such as substations. Avison Young has conducted a review of National Grid's non-operational land portfolio of sites deemed potentially surplus to requirements. This site was considered as part of this review.

National Grid own and operate electricity substations and overhead transmission lines within Lea Green Industrial Estate. In addition, National Grid owns non-operational land associated with these assets which is now deemed surplus to requirements. The extent of this land is illustrated in Figure 1 below.



*Figure 1: National Grid Operational Assets and Non-Operational Land (non-operational land identified yellow)*

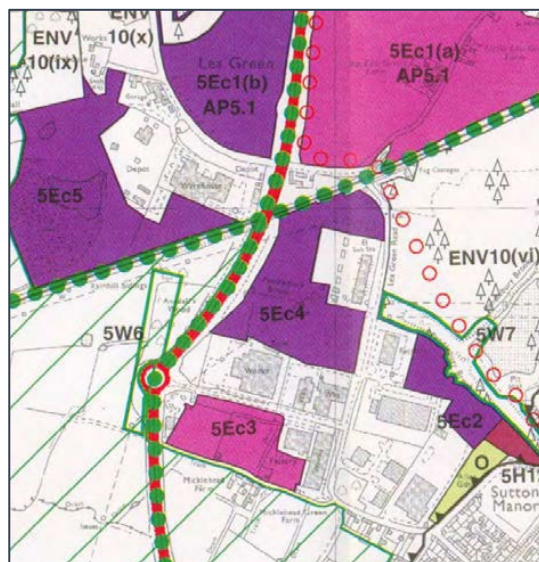
The non-operational land comprises what appears to be individual agricultural fields divided by hedgerows surrounding the operational electricity substation within the industrial estate area. It is sustainably located on the edge of the built-up area of St Helens, on an established employment park, with frequent bus services and near the strategic road network. There are also two railway stations within 2km of the site.

There are various employment uses surrounding the site in the wider Lea Green Business Park / Industrial Estate. The built form is typical low-rise out-of-centre office buildings and industrial units. There is open space across from the site to east and the St Helens Linkway A570 to the west of the site. A railway line is to the north of the site.

### **Policy Context**

Policy CE1 of the adopted Local Plan sets out the Council's aim to provide sufficient land for employment development through the plan period through identification of appropriate allocation and the reuse of existing employment land for employment development.

The site is allocated for employment use in the adopted planning framework. Saved UDP Policy ECON1 allocates the site for B1, B2, B8 uses or a petrol station. The site is identified as 5Ec4 (Land to east of M62 Link/north of Lea Green Industrial Estate) and covers the entire site.



*Figure 2: St. Helens Saved UDP Policies Map (site ref. 5Ec4)*

Although Policies CE1 and ECON1 will be deleted with the adoption of the emerging plan, emerging policy LPA04 sets out Council support for the protection of employment areas listed in Appendix 5 (including Lea Green Business Park / Industrial Estate where the site is located). The site should therefore receive Council support for employment uses. However, it does not appear that the site will retain a site-specific employment allocation.

## Representations

National Grid support the site's inclusion within the identified employment area at Lea Green Business Park / Industrial Estate. The site would therefore receive the Council's support for redevelopment for employment use. However, we are seeking to ensure that the site is appropriately recognised in the Local Plan as being suitable for development. For clarity we believe the following use classes are appropriate on the site:

- Use Class E(g) – Commercial, Business and Service
  - (i) an office to carry out any operational or administrative functions, (Offices – formerly use class B1(a))
  - (ii) the research and development of products or processes, or (formerly use class B1(b))
  - (iii) any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. (Light Industrial – formerly use class B1(c))
- Use Class B2 - General industrial - Use for industrial process other than one falling within class E(g).
- Use Class B8 - Storage or distribution.

The confirmation of this position by the Council through the policy will provide the necessary certainty to prospective purchasers of the site.

In addition, we believe the following ancillary uses are appropriate on the site:

- Use Class E(a) Display or retail sale of goods, other than hot food
- Use Class E(b) Sale of food and drink for consumption (mostly) on the premises
- Use Class E(c) Provision of:
  - E(c)(i) Financial services,
  - E(c)(ii) Professional services (other than health or medical services), or
  - E(c)(iii) Other appropriate services in a commercial, business or service locality
- Use E(d) Indoor sport, recreation or fitness
- Use E(e) Medical or health services
- Use Class E(f) Creche, day nursery or day centre

We acknowledge that MM07 relates to Policy LPA04 and propose an addition to modification MM07 to ensure that the site is included within Table 4.1 with appropriate uses included as described above.

## Summary

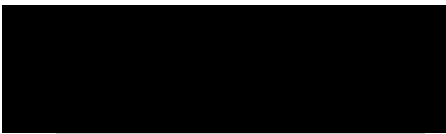
In response to the current consultation, National Grid are seeking an allocation for the site for a range of uses – primarily employment.



National Grid would be pleased to provide further information to the Council in relation to the sites' development constraints and its availability.

If you require any further information in respect of this letter, then please contact either myself (details below) or my colleague Chris Johnson (07986617296 / [christopher.johnson@avisonyoung.com](mailto:christopher.johnson@avisonyoung.com)).

Yours faithfully,



**Matt Verlander MRTPI  
Director**



**For and on behalf of Avison Young**

St. Helens Borough Local Plan Main Modifications Consultation Green catego... X

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:04

NG

National Grid (Avison Young - UK) [Redacted]

Thu 13/01/2022 16:04

To: planningpolicy@sthelens.gov.uk



13.01.21 NG Land - Rain...  
246 KB

**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

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid Land and Property.

Please find attached our completed call for sites form and site location plan. Please do not hesitate to contact me via [Redacted] if you require any further information or clarification.

Kind regards

Chris Johnson

**Chris Johnson**

Planner

[Redacted signature block]

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



**R00935**

FW: Main Modification Representations Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

- You replied on Tue 18/01/2022 15:26
- The message sender has requested a read receipt. To send a receipt, [click here](#).
- Label: 2 Year Email Retain and Delete (2 years) Expires: Thu 18/01/2024 14:50

BT Ben Thornley [redacted] Tue 18/01/2022 14:50 To: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Representation to Main ... 777 KB

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,  
 Following my email on the 13<sup>th</sup> of January I would appreciate a confirmation that you have received my email.  
 Yours faithfully,  
 Ben  
**Ben Thornley** BA (Hons) MCD MRTPI  
 Senior Planner



CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

**From:** Ben Thornley  
**Sent:** 13 January 2022 16:14  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Subject:** Main Modification Representations Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

To whom it may concern,  
 As it is not possible to download the Response form we have instead completed the form using your online service and send our accompanying representations attached to this email.  
 Our representations are submitted on behalf of the Jones Family and relate to Land at Elton Head Road, Thatto Heath.  
 Our representations relate to main modifications MM09, MM011 and Annex 2 and Annex 12.  
 The details of our representations are covered within the submitted document titled *Representation to Main Modifications*.  
 We would appreciate an email to confirm receipt of this information.  
 Yours faithfully,  
 Ben Thornley.  
**Ben Thornley** BA (Hons) MCD MRTPI  
 Senior Planner



CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

Reply | Forward

Architecture + Building Surveying + Town Planning



## **St. Helens Borough Local Plan 2020-35 Submission Draft - Schedule of Proposed Main Modifications November 2021**

**Representation Submitted on Behalf of the  
Jones Family in relation to Land at Elton  
Head Road**

---

## TABLE OF CONTENTS

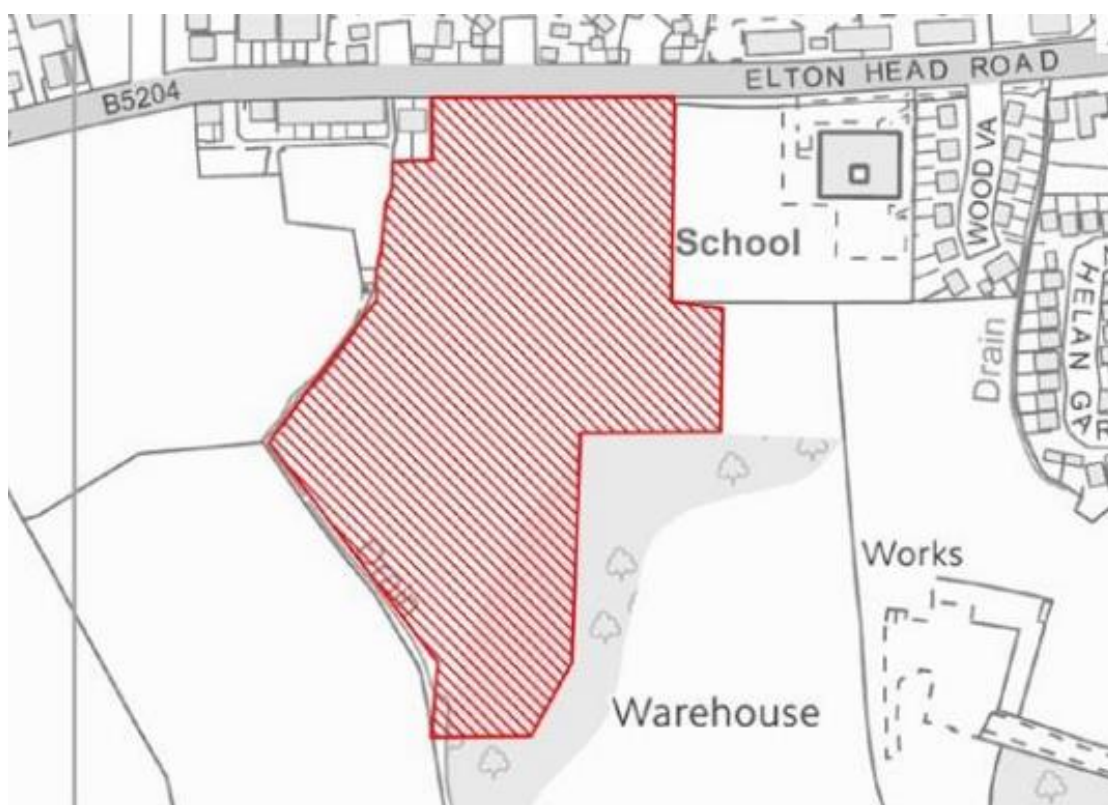
<b>1.0 INTRODUCTION.....</b>	<b>1</b>
<b>2.0 TECHNICAL UPDATES REQUIRED .....</b>	<b>2</b>
<b>3.0 KEY CONSIDERATIONS.....</b>	<b>3</b>
<b>4.0 UPDATED GREEN BELT REVIEW AND ASSESSMENT .....</b>	<b>4</b>
<b>5.0 CONCLUSIONS .....</b>	<b>16</b>

## 1.0 INTRODUCTION

- 1.1 Following the examination in May 2021 of the St Helens Borough Local Plan 2020-2035 Submissions Draft produced in January 2019, the Planning Inspectors examining the Local Plan have identified Main Modifications to be made to the Local Plan Submission Draft which are necessary for the plan to be found “sound”.
- 1.2 The Main Modifications are made without prejudice to the Inspectors final conclusions which will be provided in their report in due course.
- 1.3 Interested parties are invited to make representation regarding the Main Modifications and the main modifications only. Any representation must be received by the Local Authority by the close of the consultation the 13<sup>th</sup> of January at 5pm.
- 1.4 The representations below are submitted on behalf of the Jones Family and relate solely to their presently safeguarded site at Land Off Elton Head Road.
- 1.5 The Main modifications (MM) have not proposed that the status of Land off Elton Head Road change from its present emerging allocation as a safeguarded site.
- 1.6 The MM do however cover a number of aspects relevant to the site which must be weighed in full and also some clarification provided.
- 1.7 An outline planning application for 109no dwellings on the site has been prepared and submitted to the Local Authority with validation taking place on the 17<sup>th</sup> of December 2021. The reference for this application is P/2021/1070/OUP.

## 2.0 TECHNICAL UPDATES REQUIRED

- 2.1 The Location plan used within the Main Modifications does not cover the full site and omits the eastern aspect leading towards the existing residential development adjacent. This element should be resolved as part of the next formal issue of the Draft Local Plan.



Location Plan from the Main Modifications

- 2.2 Annex 12 identifies that the application site is 3.72 Hectares which is broadly accurate, however the table indicates a net deliverable area of 75% and a dwelling density of 30 units per hectare which equates to a total allocation of 84 units. Gross density across the site therefore equates to 22 units per hectare.
- 2.3 The submitted outline planning application identified all relevant site constraints and it has been identified that the net developable area is in excess of 75% and as such the proposed scheme achieves a gross density of 29 units per hectare, significantly in excess of the expectations set out within the main modifications document.
- 2.4 It is kindly requested that the above along with the submitted outline application be considered and the figures within Annex 12 be updated accordingly now that further detailed information is available.

## 3.0 KEY CONSIDERATIONS

- 3.1 At Pages 51 and 52 under the title *7HS – Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath* the Inspector provides significant commentary regarding the site.
- 3.2 The Inspector states that the site has a medium development potential and makes a low contribution to the green belt purposes. The Inspector also goes on to state that the site is identified as being sustainability located.
- 3.3 The identification of the site as being of medium development potential appears to have been taken from the previous Green Belt review process. We have assessed this at chapter 4 below and the conclusion is reached that the previous assessment was considerably flawed in regard to the approach to our site and in fact the site can be considered to have a High development potential.
- 3.4 At page 52 however the Inspector goes on to state that as the surrounding area includes opportunities for development 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.
- 3.5 We have undertaken an assessment of larger previously developed sites in Thatto Heath and have only identified a single opportunity which is the Linkway Distribution Park located East of our site.
- 3.6 Although not started on site, Outline Planning permission for the site has been granted and an application for approval of reserved matters for 294 dwellings was submitted in April 2021 and is presently awaiting determination. It is considered that this proposed scheme is likely to start on site and be almost complete by the time the first of the units on our site would be ready for sale, should outline consent be granted for P/2021/1070/OUP.
- 3.7 Following this singular site there are no other sites to come forward and as such it is considered that the development of Land off Elton Head Road should not be held back until after the plan period, as presently proposed.
- 3.8 Should the site be maintained as a safeguarded site it is considered that there will be a significant fallow period for housing development in Thatto Heath which has clearly demonstrated from previous residential schemes that it is a popular and viable area for new housing within the Borough with good access to all necessary amenities.

## 4.0 UPDATED GREEN BELT REVIEW AND ASSESSMENT

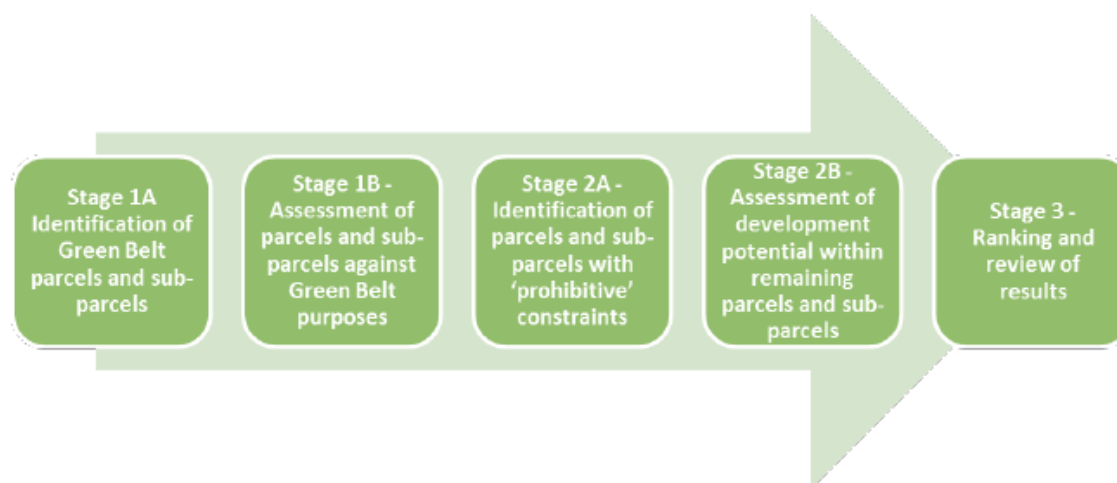
- 4.1 Some of the SHLAA sites are subject to physical or other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities. An allowance of 15% has been made for reduced delivery on the SHLAA sites over the later years of the SHLAA period. Total delivery from sites in the urban area is expected to fall substantially short of the total housing delivery required under Policy LPA05. As a result, the proposed land supply includes a number of allocated sites that have been released from their previous designation as Green Belt. This element of the supply includes a contingency of 20% to allow for potential delays in development, for example to allow for the provision of essential infrastructure in currently undeveloped areas and other issues that may affect supply.
- 4.2 In accordance with Policy LPA02, the housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold. In total, the allocated brownfield sites (3HA, 6HA, 9HA and 10HA) have an estimated capacity of 2,029 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 (Dec. 2018). In total, the former Green Belt sites (1HA, 2HA, 4HA, 5HA, 7HA, and 8HA) have an estimated capacity of 2,056 dwellings in the Plan period.
- 4.3 A range of sites are being proposed for removal from the Green Belt. These have been split into either 'Safeguarded' housing sites or 'Allocated' housing sites.
- 4.4 Allocated housing sites would come forward for development within the approaching plan period (2020 – 2035), whilst safeguarded sites would be reserved for development within the following 15 year plan period from 2033.
- 4.5 The Green Belt Review document supporting the Submission Draft Plan states that, in accordance with Policy LPA02, the safeguarded sites listed for housing 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 2035. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2035.
- 4.6 ***The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St. Helens***



**Green Belt Review 2018. It is with reference to this that we raise a serious question as to the 'selection of sites' for release from the Green Belt and their support for either allocation or safeguarding within the Plan. As seen through the following, a critical analysis of the Green Belt Review leads to the Council's site selection category to be greatly questioned, which in turn raises questions over justification of the Plan, i.e. the second test of soundness.**

## GREEN BELT SITE ASSESSMENT

- 4.7 The Green Belt Review was published in December 2018 and sets out the LPA methodology of determining which parcels of land should be removed from the Green Belt.
- 4.8 As part of the Green Belt Review, candidate sites have been assessed through a five step process set out below.



- 4.9 Following the above assessment methodology, *Table 5.3* was produced which ranked a total of 56 residential sites that had progressed through the earlier 4 stages.
- 4.10 This ranking exercise combined the two scores from Stages 1B and 2B to create a new Overall Score with 6 being sites with the most potential for being removed from the Green Belt and 1 with the least potential.
- 4.11 This exercise resulted in 10 sites which were given the score of 6 and 8 sites were given the score of 5.
- 4.12 Of the sites given the score 6, 9 of these were *allocated* and one has been marked as a *Green Belt Anomaly*.

**Proposed Main Modifications | 12/01/2022**

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

---

- 4.13 Of the sites given the score 5 all of these have been indicated as Safeguarded.
- 4.14 In turn these sites have been included within the St Helens Borough Local Plan 2020 -2035 Submission Draft Document (January 2019).
- 4.15 The following table indicates all of the allocated and safeguarded housing sites including non-Green Belt release sites.

## Proposed Main Modifications | 12/01/2022

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

Site	Allocation	Safeguarded	Currently Green Belt	Units 0-100	Units 100 - 300	Units 300+	Stage 1b Score	Stage 2b Score	GB review score
1HA	Yes	No	Yes		Yes		Low	Good	6
2HA	Yes	No	Yes			Yes	Low	Good	6
3HA	Yes	No	No			Yes	Na	Na	Na
4HA	Yes	No	Yes			Yes	Low	Good	6
5HA	Yes	No	Yes			Yes	Low	Good	6
6HA	Yes	No	No			Yes	Na	Na	Na
7HA	Yes	No	Yes		Yes		Low	Good	6
8HA	Yes	No	Yes		Yes		Low	Good	6
9HA	Yes	No	No			Yes	Na	Na	Na
10HA	Yes	No	No			Yes	Na	Na	Na
1HS	No	Yes	Yes		Yes		Medium	Medium	5
2HS	No	Yes	Yes		Yes		Medium	Good	5
3HS	No	Yes	Yes			Yes	Low	Medium	5
4HS	No	Yes	Yes		Yes		Low	Medium	5
5HS	No	Yes	Yes		Yes		Low	Medium	5
6HS	No	Yes	Yes		Yes		Low	Medium	5
7HS	No	Yes	Yes	Yes			Low	Medium	5
8HS	No	Yes	Yes			Yes	Low	Medium	5
<i>*highlighted line is the land south of Elton Head Road, the Jones' land that is the subject of these representations</i>									

**Proposed Main Modifications | 12/01/2022**

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

4.16 As can be seen above, site 7HS, or GBP\_085c as it is referenced in the Green Belt Review Document (December 2018), is the smallest of the sites included within the allocated or safeguarded sites.

4.17 Below is an extract from the Green Belt Review where the site is analysed and is indicated as having an overall score of 5 due to its stage 2b score being only medium in regard to development potential.

GBP_085c	Land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School.	Low	Medium	5	84
----------	--	-----	--------	---	----

4.18 As can be seen above the site achieved the best score possible at stage 1b (Low) however received only the score of *Medium* at the Stage 2b Assessment resulting in an overall score of 5.

4.19 This score relates to the assessment of development potential in the remaining sites. The sites were assessed against constraints, accessibility to modes of transport and ownership and viability issues.

4.20 The LPA assessment of each parcel is set out in table 5.4, the comments on the decision relating to site GBP\_085c are included below.

GBP_085c Land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School	Safeguarded (in part)	<p>This sub-parcel is located south of Thatto Heath and forms part of a larger area of land which was proposed by the Council as safeguarded land at the LPPO stage.</p> <p>A number of constraints affect the sub-parcel as a whole which impact on its overall NDA. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to recommend a reduced NDA within the sub-parcel.</p> <p>The sub-parcel is sustainably located as it is within walking distance of a local convenience shop and readily accessible by users of public transport and the local highway network. The sub-parcel is also well self-contained visually, by the existing development to the north, a school to the north east, woodland and the new Waterside Village housing estate to the south east, and by higher ground to the west.</p> <p>However, development of the larger site proposed at LPPO stage would be likely to cover the prominent side of a scarp slope with characteristic rocky outcrops. As a result it would be likely to cause harm to the character and appearance of the area, within an area which scores Medium to High for landscape visual sensitivity. The resultant harm can be adequately addressed by</p>
--	-----------------------	--

## Proposed Main Modifications | 12/01/2022

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

	<p>reducing the NDA so that it just covers the eastern portion of the sub-parcel. The NDA within the reduced area would also be well defined by a clear, robust field boundary which runs through the sub-parcel and by the woodland and primary school grounds to the east.</p> <p>Access to the sub-parcel can be provided from Elton Head Road, where there is a 20mph speed limit. Any development would also need to apply an appropriate buffer alongside the priority habitats woodland to the south east and alongside a priority habitat grassland.</p> <p>These constraints would not be sufficient to preclude the development of the sub-parcel within the reduced NDA referred to above.</p> <p>The sub-parcel constitutes mixed grade 3 agricultural land. The surrounding area includes substantial opportunities for re-development of previously developed sites including at the Suttons depot site a short distance to the east. To ensure an appropriate phasing of development within the Thatto Heath area it would be appropriate to delay any development within sub-parcel GBP_085c until after the end of the Plan period.</p> <p>The SA assessed the sub-parcel as part of the larger site proposed at LPPO stage. It concluded that its development would have a positive impact on the achievement of a number of SA objectives.</p> <p>Having regard to all the factors set out above, it is concluded that the eastern part of the sub-parcel only should be released from the Green Belt, and safeguarded to help meet potential housing development needs after the Plan period. .</p>
--	---

- 4.21 It is clear from the above assessment that the individual site is still being assessed as part of the much larger allocation (HS24), which was considered at the LPPO stage.
- 4.22 Due to this there are a number of discrepancies where points relating to the wider site are identified as being negative however when considering the site in isolation these are not relevant.

### INDEPENDENT STAGE 2B ASSESSMENT

- 4.23 In light of the above and for the benefit of these representations, we have undertaken an independent site assessment (equivalent of Stage 2B assessment), which follows the same methodology set out within the Green Belt Review. This is set out as follows:
- 4.24 Constraints are identified in the table below and an assessment is made against each element identified within the Green Belt Main Report.

Constraint type	Reason why this constraint was assessed	Assessment
Landscape and Visual Character	To Minimise impact on the landscape.	Is identified within the response as being well self-contained visually by existing development to the North, a School to the North East, Woodland and the new Waterside village

		housing estate to the South East. As part of application P/2021/1070/OUP a full and detailed landscape visual impact assessment has been undertaken and this concludes that the proposed development will not have a negative impact on landscape.
Ecology	To minimise impacts of new development on biodiversity.	The site is a green field site however there are no ponds on the site and although tree lined boundaries may form suitable habitats for bats it is not considered that this would unduly impact upon the developable area. Ecology has been considered in full within the Preliminary Ecological Assessment submitted as part of planning application P/2021/1070/OUP. The assessment concluded that the scheme can be developed without a negative impact upon ecology.
Agricultural Land Quality	To take into account the economic and other benefits of best and most versatile agricultural land.	The site is classified Grade 3 Agricultural Land and hence does not represent either the best or most versatile agricultural land.
Heritage Assets	To consider the effects of development on the identified heritage assets.	There are no Heritage assets on the site and it does not form the setting of any such assets.
Flooding	To implement national policy that areas within flood zone 2 or 3 should not be developed unless development needs.	The site is not within any identified flood zones. The Flood Risk and Drainage report produce to support planning

**Proposed Main Modifications** | 12/01/2022

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

	cannot be met by use of land at lower flood risk.	application P/2021/1070/OUP confirms that the scheme can be developed and not increase flooding on the site or cause an increase in flooding elsewhere.
Trees and woodland	To minimise loss of important trees and woodlands.	There will be minimal loss of trees to facilitate access. The submitted application confirms that only a small number of poor quality specimens on Elton Head Road will need to be removed to facilitate the whole development.
Open space and recreation	To avoid loss of open space and sporting facilities in areas of shortage.	No open space or sporting facilities will be lost and the MM confirm that no new public open space should be provided on the site.
Minerals	To ensure that important mineral resources are not sterilised by new development.	The site is not identified as a minerals safeguarding zone.
Infrastructure	To ensure that development does not jeopardise (a) the integrity of existing infrastructure or (b) the ability to deliver future infrastructure improvements.	Existing infrastructure is sufficient to accommodate the proposed site.
Ground Conditions	To identify any likely constraints related to landfill, contamination or subsidence.	A coal mining risk assessment identified the presence of 1 potential mine shaft on the site and this has been suitably mitigated within application P/2021/1070/OUP.
Air, Water and noise pollution	To identify whether the site is suitable for the proposed use in relation to these pollution issues.	The site is a Greenfield site and is not subject to any of the pollutants identified.

Hazardous Installations	To identify whether occupiers of the site would be subject to unacceptable risks from such installations (including pipelines).	There are no hazardous installations on the site.
Neighbouring uses	To ensure proposed use would be compatible with nearby land uses.	All of the surrounding uses are compatible with the nearby land uses.

4.25 As can be seen above, due to survey work that has already been completed on the site, it is exceptionally well placed to be brought forward for residential development. ***These results are as good if not better than all of the sites included for allocation and awarded a High potential for being brought forward.***

4.26 The next element of assessment for stage 2B is in relation to accessibility to sustainable modes of Transport. The below table follows the guidelines set out within the methodology. A full and detailed highways assessment has also been submitted as part of planning application P/2021/1070/OUP.

Modes of Transport	Guidance to differentiate between parcels/sub-parcels	Assessment
Walking	Within 600 metres safe and convenient walking distance of a district or local centre	Site is well located for walking as identified within LPA Green Belt Review Comments
Cycling	Within 1 mile safe and convenient cycling distance of a district or local centre	Site is well located for cycling as identified within LPA Green Belt Review Comments
Public Transport	Within 400 metres safe and convenient walking distance of a bus stop with a reasonable range of services to different destinations	Site is readily accessible by users of public transport as identified within LPA Green Belt Review Comments
Vehicular Traffic	Safe and convenient access can be provided for all vehicles that are likely to use the parcel/sub-parcel to and from (a) the public	Site is readily accessible by users of the local highway network as identified within LPA Green Belt Review Comments



	highway and (b) the strategic road network	
--	--	--

4.27 The site is exceptionally well located for access to sustainable transport methods and meets all of the recommended guidance. As such this site must be considered to be awarded a *High* mark for this element of the 2b assessment.

4.28 The third and final element of assessment relates to ownership and viability issues. Within this element in the methodology it sets out 3 elements for consideration, these are covered below.

4.29 ***Whether there is active developer interest;***

The land owner has been approached repeatedly by house builders including those operating within close proximity to site. Following submission of application P/2021/1070/OUP further interested parties have contacted the land owner regarding the purchase of the site to progress with development as soon as possible.

4.30 ***Whether similar areas have been successfully developed in recent years;***

Directly to the South and East of the site is a residential development which is currently being built out by Morris Homes. Due to this site's close proximity and ongoing successful build it is felt that if the proposed site were to be included as an allocation there might be opportunities for the emerging residential site to form a final phase of this presently developing site.

This could give opportunities for shared facilities and infrastructure between the permitted and the new site if allocated.

4.31 ***Whether there are any known abnormal development costs***

A number of surveys of the site have been completed and none of these have identified any potential abnormal development costs. As this is a green field site and has never been developed there are not expected to be significant abnormal site constraints including contamination or difficult constructions access. Further work undertaken for the Outline application has not identified any abnormal development costs and has provided clarity on certain constraints on the site removing unknowns.

## CONCLUSION OF UPDATED SITE 2B ASSESSMENT

- 4.32 The aim of Assessment 2b is to reach overall conclusions on the development potential of each parcel/sub-parcel of land and consider the likelihood that those sites would come forward for development within the plan period if they are released from the Green Belt.
- 4.33 Site reference 7HS/GBP\_085c is ideally located for Green Belt release and the above independent site assessment clearly sets out that when considered on its own rather than as part of a larger site the only possible score it should be given is High.

## CHARACTERISTICS COMPARED TO OTHER SAFEGUARDED AND ALLOCATED GREEN BELT SITES

- 4.34 The allocated and safeguarded sites have been assessed by the Council in a manner based on certain characteristics, which have determined whether they are placed within one tranche or the other.

### Allocated Sites

- 4.35 When assessing Land off Elton Head Road as an individual site, it is clear that the characteristics of the site(s) and their good deliverability is much more akin to the allocated rather than the safeguarded sites.
- 4.36 The site area of Land off Elton Head Road at 3.59 hectares is lower than some of the allocated sites (although it is acknowledged that some of these allocated sites are strategic allocated sites, which by their nature are of a significant size).

### Safeguarded Sites

- 4.37 In comparison to the other safeguarded sites, the majority of these are significantly larger in area and do not relate as well to existing built forms. In addition, they are often much further away from local services and facilities and would have greater impact upon the landscape and purposes of the Green Belt.
- 4.38 Unlike several safeguarded sites, Land off Elton Head Road site does not score less in terms of deliverability. It has no prohibitive constraints and is under single ownership. There is clearly a positive relationship with the surrounding built forms and the site is in a sustainable location.

- 4.39 The development of the site would not have a detrimental effect on the amenities of neighbouring land uses. The proposed use will complement the neighbouring land uses, which are principally residential. The development of the site would have a limited impact on the character of the wider landscape. The development provides the scope to enhance and create a more appropriate settlement edge to the area.

### IMPACT UPON OVERALL SCORE AND SUBSEQUENT IMPACT ON ALLOCATION

- 4.40 The Land owner and the LPA both agree that site 7HS/GBP\_085c should be awarded the best score at stage 1b (Low) and as such be allocated the full 3 points at stage 3. There is a difference in opinion however regarding the stage 2b score. The LPA marked this as medium rather than **High** as the above assessment concludes. Having reviewed the LPA comments it becomes clear that this low score can only be achieved due to the LPA considering it as part of the much wider site rather than considering the site on its own merits.
- 4.41 When the site is considered on its own merits it is clear the only correct score can be **High** with this in mind it should also be allocated the full 3 points at stage 3 resulting in an overall score of 6.
- 4.42 As set out above all other sites with a score of 6 have been included as Allocated sites. It is our view that the site, when considered fairly is an incredibly logical piece of land for release from the Green Belt with limited impacts upon the purposes of including land within the Green Belt and also with no known constraints to prohibit efficient delivery of homes.
- 4.43 The Inspector when at page 52 of their MM states that the site is of medium development potential. As clearly demonstrated above this is not the case and in fact the development potential of the site is high.

## 5.0 CONCLUSIONS

- 5.1 From a spatial strategy perspective, we are of the view that the approach taken by the Council and agreed upon within the MM on the alteration of the Green Belt boundaries as an exceptional circumstance seeking to meet its housing and employment needs is justified. The key question being asked is the robustness of the site selection.
- 5.2 As a starting point, we support in principle the allocation of the land south of Elton Head Road for housing, the crux of the matter is that the land should be an allocated site under Policy LPA05.1: Strategic Housing Sites, as opposed to Policy LPA06: Safeguarded Land. The site is deliverable and can be brought forward for residential development without delay within the early stages of the Plan.
- 5.3 The Inspector's comments have been considered and further context or clarity has been provided above. This representation to the MM is specific and makes clear that the site is most suited to a full allocation rather than being a safeguarded site.
- 5.4 For the reasons outlined within this document, it is requested that the site is then transferred from the Safeguarded Sites list (Policy LPA06) to the Allocated Sites list (Policy LPA05), to be brought forward for residential development within the approaching 2020 – 2035 plan period, rather than being reserved for the following 2033 plan period.
- 5.5 With full control over the land an outline planning application has been submitted and an interest has already been expressed by housebuilders. It is therefore submitted that the land is 100% deliverable. This deliverability means the site can make a valuable contribution, sooner rather than later to the housing supply within St. Helens.
- 5.6 The question lies as to whether the promotion of the land to the allocations should be done to the detriment of one or more of the sites currently supported for allocation in the submission draft document. As the housing supply figures have been deemed too low by the Inspectors (MM009) the addition of a single deliverable site along with the increased density on other allocated sites would improve the soundness of the plan. Alternatively, there could be a consideration against one or more of the supported sites and the associated projected delivery numbers, which could be reduced to accommodate the additional allocation so endorsing the effectiveness of the Plan and the associated deliverability of sites over the Plan period. All of which is critical to the Inspector's assessment of soundness of the Plan.

# Cassidy+ Ashton



**Chester Office:**

10 Hunters Walk, Canal Street,  
Chester, CH1 4EB



**Preston Office:**

7 East Cliff, Preston,  
Lancashire, PR1 3JE



**Email us:**

architecture@cassidyashton.co.uk  
surveying@cassidyashton.co.uk  
planning@cassidyashton.co.uk



[www.cassidyashton.co.uk](http://www.cassidyashton.co.uk)

Architecture + Building Surveying + Town Planning

**From:** [REDACTED]  
**Sent:** 13 January 2022 16:00  
**To:** planningpolicy@sthelens.gov.uk  
**Subject:** The Form 'Local Plan Main Modifications Consultation – November 2021' was submitted

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**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**  
Other

**Other title**

**First Name**  
Owens Family

**Last Name**  
Owens

**Organisation/company**  
c/o Cassidy+Ashton

**Address**  
10 Hunters Walk  
Canal Street

**Postcode**  
CH1 4EB

**Telephone Number**  
[REDACTED]

**Mobile Number**

**Email Address**  
[REDACTED]

**Do you have an agent?**  
Yes

**Agent's Title**  
Mr

**Other title for Agent**

**Agent's First Name**  
Benjamin

**Agent's Last Name**  
Thornley

**Agent's organisation/company**  
Cassidy+Ashton

**Agent's Address**  
10 Hunters Walk, Canal Street

**Agent's Postcode**

Agent's Telephone Number

[REDACTED]

Agent's Mobile Number

Agent's Email Address

[REDACTED]

**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?**

MM009

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

Yes

**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**

Please see submitted Representations titled:

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

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

Yes

**8. Which Main Modification does this representation relate to?**

MM011

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

Yes

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

No

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

Please see submitted Representations titled:

Representation Submitted on Behalf of the Jones Family in relation to Land at Elton Head Road

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

No

**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**



**R00938**

[REDACTED]

---

**From:** Denise Jones [REDACTED]  
**Sent:** 11 January 2022 16:51  
**To:** [planningpolicy@sthelens.gov.uk](mailto: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.

I fully endorse and support all comments made by RAFFD and GRAG in reply to the Local Plan.

Mrs Denise S Jones,  
2 Peebles Close,  
Garswood,  
Ashton in Makerfield.  
WN4 0SP  
Sent from my iPhone