

RO1992

From: Joanne Almond [REDACTED]
Sent: 25 November 2021 12:02
To: planningpolicy@sthelens.gov.uk
Subject: Fwd: Planning for building Vulcan Village 2022

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Sent from my iPhone

Begin forwarded message:

From: J Almond [REDACTED]
Date: 25 November 2021 at 12:00:25 GMT
To: [REDACTED]
Subject: Planning for building Vulcan Village 2022

Hi

I wish to express my concerns regarding the proposal of building on the large farmers field at the back of the conservation cottages in the Vulcan Village. I cannot begin to start to tell you how much this has saddened not only our family household but most of the residents I have spoken to.

[REDACTED] When the newly refurbished Village re opened Princess Anne came to visit, it was a very proud moment for us all. One of the comments Princess Anne made was how quaint the conserved village was and how lovely for residents to be surrounded by such beautiful countryside.

When we found out the building works would commence at the Vulcan Park Way we knew this was the begging of large change to the dynamics of our quaint conservation village. After years of putting up with noise, dust, building traffic and muddy roads from the recent build at Vulcan Park way we are extremely anxious and upset at the thought of future years of the same.

This beautiful land has to be conserved or at least a compromise half of it! After the Vulcan Park Way build, it flushed lots of wildlife down the field towards the back of Manchester Row. It's a wonderful mind soothing sight and thought that there is still open space and hedgerows where unusual birds, bats, pheasants, foxes, owls, hawks and many other wildlife have made their habitat. Lots of people enjoy the sight of the land space and take pictures of the beautiful field in all its glory throughout the changing seasons.

This space also allows light and fresh air to circulate the Village, we are already surrounded by two railway lines and a major road and now the new houses at the top of Vulcan Park Way, some of which are three stories high and really overpower the cottages. I am terrified of the thought of even more traffic fumes from even more cars from the proposed new build. Since the new build at Vulcan Park Way we are also experiencing traffic congestion through the village at peak times. How is such a small infra structure going to cope with potentially several hundred more vehicles moving through the village and through the small railway tunnel leading to Alder Root Lane??

Along with the worry of potentially more traffic/light/noise/air pollution, and the loss of natural habitat, is flooding. During heavy periods of rain parts of the village become flooded, especially

under the small railway bridge that runs towards Alder Root. If more land is taken for building where is all the water going to go?

I can not express how anxious and upsetting it was for us and other residence to receive the letter of the proposed build at the back of Manchester Row. We feel like the lovely conserved village is becoming surrounded and overpowered leaving no open space for residents to enjoy and all the wonderful wildlife to be enjoyed and to thrive! I feel so strongly against the proposed build that I will write to my local councillor and express the concerns of the Villagers. I think if the proposal wasn't to cover **ALL** the field at the back of Manchester Row I think people wouldn't be so disgruntled by the plans.

Please, please, please consider all the above factors and why the proposed build would be a disaster to the Vulcan Village residence.

Kindest regards
Mr and Mrs Almond
Residents of the Village

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RO1993

[REDACTED]

From: Alasdair Saunders [REDACTED]
Sent: 04 January 2022 17:45
To: planningpolicy@sthelens.gov.uk
Subject: Main Modification Consultation
Attachments: SHGBA MM Response Jan22.docx

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I fully endorse the issues raised in the attached report from the St Helens Green Belt Association.

Regards

Alasdair Saunders

12 Lynton Way
Windle
St Helens
Merseyside
WA10 6DZ

ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA

(December 2021)

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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	<u>LPA02, and given the brownfield nature of much of this site, and for the other reasons set out, there are exceptional circumstances justifying the removal of this site from the Green Belt.</u>	
MM008	<ul style="list-style-type: none"> • “1EA: Omega South Western, Land north of Finches Plantation, Bold; • 2EA: Land at Florida Florida Farm North, Slag Lane, Haydock²² • 6EA: Land west of ...” <p>Delete footnote 22</p> <p>“5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA, and 6EA, 2EA and 8EA) and Policies by LPA10 and <u>LPA12</u> (in the case of sites 7EA and 8EA <u>7EA and 8EA</u>).”</p>	No comment to make.
MM009	<p>“1. In the period from 1 April 2016 to 31 March 2037 5 a minimum of 9,234 10,206 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.”</p> <p>“a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St. Helens or Earlestown Town Centres; and</p> <p>b) at least 30 dph on all sites outside St. Helens and Earlestown town centres. that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and</p> <p>c) at least 30 dph on other sites that are within an existing urban area. Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area.”</p> <p>“b) If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, taking into account the</p>	<p>Support extended plan period, see previous submissions on housing requirement calculation.</p> <p>Support.</p> <p>The text should be amended to take into account that monitoring could also show a</p>

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

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

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

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

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

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

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

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

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	<p>Green Belt boundaries set by this Plan can endure well beyond 20357<u>5</u>. The reasons why specific sites are safeguarded rather than allocated for development before 20357<u>5</u> are set out in the St. Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8. This is to ensure that, potentially, they could be used for these purposes in the future.</p> <p>4.24.2 The development of the safeguarded sites for the purposes in Tables 4.7 and 4.8 will only be acceptable if a future Local Plan update, either full or partial, confirms that such development is both acceptable and required, and proceeds to allocate such sites for development in that update. The Council may undertake and bring into effect such a Local Plan update within the current plan period of 2020-2037, should this be required and justified by the latest evidence. This e-case for developing the sites is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity and needs and any other factors that may affect the delivery of the sites at that time.</p> <p>4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,739<u>644</u> dwellings. To this can be added the indicative post-20375<u>5</u> delivery of 2,995 3,223 dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA and 10HA (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 20375<u>5</u>. Further contributions are likely to be made from windfall sites and other sources after 20375<u>5</u>. It should also be noted that household growth rates in St. Helens Borough are currently projected to reduce in the years up to, and after, 20375<u>5</u>, meaning that it is likely that post-20375<u>5</u>, housing needs may be lower than between 2020 and 20375<u>5</u>.</p> <p><u>“Green Belt Exceptional circumstances</u></p>	<p>MM supported, subject to our previous objections not finding favour.</p> <p>Updated figures noted.</p> <p>See our previous submissions on Green Belt.</p>

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

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

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

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

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

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

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

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

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

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

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	<p>people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible</p> <p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (20372035). Of the overall housing provision of 10,206 9,234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,457 223 (24%) should be affordable. The amount of”</p> <p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2)a of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ adaptable dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. <u>A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.</u>”</p>	<p>Support.</p> <p>Support.</p>
MM022	<p>“2. Proposals for new open market housing developments of 14 10 units or more, <u>or when the number of units is not known, sites of 0.5ha or more,</u> will be required to.....”</p> <p>“6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <u>Furthermore, it is acknowledged that ‘First Homes’ have been introduced by the Government, and fall within the definition of ‘affordable housing’.</u></p>	Support.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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	<p>in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases. <u>In doing so, this Policy will support the Council’s Climate Change Emergency declaration.”</u></p> <p>“8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. <u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, ‘smaller developments’ is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council’s ‘Guidance Notes for the Submission of Transport Assessments’ (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will be determined on a site by site basis.</u> Any significant effects would need to be addressed in line with Policy LPC06.</p> <p><u>“8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u></p> <ol style="list-style-type: none"> <u>1. Electric vehicle charging points at parking spaces;</u> <u>2. Provision of a communal minibus (particularly if electric), and car club space;</u> <u>3. Cycle parking and shower facilities for staff;</u> <u>4. On-site services (e.g. GP surgeries and</u> 	

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

RO1994

From: David Thorpe [REDACTED]
Sent: 04 January 2022 16:25
To: planningpolicy@sthelens.gov.uk
Subject: St Helens Local Plan

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

Dear sir/madam,

I am emailing to let you know that I fully endorse the issues raised on behalf of the SHGBA (December 2021) that have been submitted on behalf of The St Helens Green Belt Association.

Could you please acknowledge receipt of this e mail please?

Kind regards,

David Thorpe
6 Brookside Avenue
Eccleston
St Helens
WA104RN

RO1995

[REDACTED]

From: Clare Sherwood [REDACTED]
Sent: 04 January 2022 17:48
To: planningpolicy@sthelens.gov.uk
Subject: Supporting the issues raised by SHGBA on the Local Plan

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

Dear Sir, Madam,

I am a local resident:
38 Calderhurst Drive
Windle
St Helens
Wa106ed

I am writing to you in support of St Helen's Green Belt Association and to endorse the issues that have been raised in their report, dated December 2021.

Yours faithfully,
Clare Sherwood.

Sent from my iPhone

RO1996

[REDACTED]

From: [REDACTED]
Sent: 04 January 2022 17:54
To: planningpolicy@sthelens.gov.uk
Subject: Unnecessary building on Green Belt

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 am writing to state that I endorse the issues raised on behalf of SHGBA.

This is to shown my strength of feeling about unnecessary building on Green Belt, particularly as St Helens has sufficient Brownfield land to meet recognised needs for the foreseeable future!

Mrs Pat Oakes
105 Broadway
Eccleston
St Helens
WA105PJ

RO1997

[REDACTED]

From: Matthew Grace [REDACTED]
Sent: 04 January 2022 18:14
To: planningpolicy@sthelens.gov.uk
Cc: [REDACTED]
Subject: St Helens Green Belt Association - Main Modification Consultation 8HS
Attachments: SHGBA MM Response Jan22.docx

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

To whom it may concern,

We would like to state that we endorse the issues raised on behalf of the SHGBA.

Mr Matthew Grace and Mrs Ashleigh Grace

27 Ecclesfield Road
WA10 5NE

Regards,
Matthew.

ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA

(December 2021)

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

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

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

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

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

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

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

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

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

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p><u>but not limited to land at Florida Farm North, Land north of Penny Lane, Land at Lea Green Farm West and Gerards Park, College Street.”</u></p> <p>“4.12.1720 Alternative uses may also be appropriate where there is no current or likely future market demand for employment uses on the site and / or its reuse for such purposes would not be viable currently or in the long term. The Local Economy Supplementary Planning Document (2013) outlines the evidence applicants will be required to provide in relation to the marketing and viability of employment sites before their loss for other uses can be supported. <u>This outlines the requirement for existing employment sites to carry out a minimum of 12 months marketing for employment uses in order to identify that the site is not viable in the long-term.”</u></p> <p>“Green Belt Exceptional circumstances</p> <p><u>4.12.22 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></p> <p><u>1EA – Omega South Western Extension, Land north of Finches Plantation, Bold</u></p> <p><u>4.12.23 The Green Belt Review (2018) found the sub-parcel reflecting this site to make a ‘medium’ contribution to the Green Belt purposes as whilst the site contains no inappropriate development and has open views across it, it is bordered by large scale built development at Omega South and the M62, and therefore only has a moderate countryside character. The Review also found the site to have ‘medium’ development potential.</u></p>	<p>Support</p> <p>No comment to make.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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	<p>Green Belt boundaries set by this Plan can endure well beyond 20357. The reasons why specific sites are safeguarded rather than allocated for development before 20357 are set out in the St. Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8. This is to ensure that, potentially, they could be used for these purposes in the future.</p> <p>4.24.2 The development of the safeguarded sites for the purposes in Tables 4.7 and 4.8 will only be acceptable if a future Local Plan update, either full or partial, confirms that such development is both acceptable and required, and proceeds to allocate such sites for development in that update. The Council may undertake and bring into effect such a Local Plan update within the current plan period of 2020-2037, should this be required and justified by the latest evidence. This e-case for developing the sites is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity and needs and any other factors that may affect the delivery of the sites at that time.</p> <p>4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,739644 dwellings. To this can be added the indicative post-20375 delivery of 2,995 3,223 dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA and 10HA (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 20375. Further contributions are likely to be made from windfall sites and other sources after 20375. 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, 20375, meaning that it is likely that post-20375, housing needs may be lower than between 2020 and 20375.</p> <p>“Green Belt Exceptional circumstances</p>	<p>MM supported, subject to our previous objections not finding favour.</p> <p>Updated figures noted.</p> <p>See our previous submissions on Green Belt.</p>

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

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

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

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

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

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

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

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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	<p><u>culture. A Town Investment Plan will be developed and will sit alongside the Town Centre Strategy.</u></p> <p>“5.3.8 The 'Area of Opportunity', referred to in the Strategy, has been identified due to the potential to reconfigure and / or redevelop land and premises close to Church Square and Chalon Way for suitable town centre uses. <u>To support this initiative and to assist in the regeneration of the area, the Council has entered into a regeneration partnership with the English Cities Fund to deliver a comprehensive redevelopment of the Town Centre (and wider Borough on a phased basis).</u>”</p> <p>“5.3.9 To guide the application of the policies concerning main town centre uses, a Primary Shopping Area and Primary and Secondary Retail Frontages have been identified in line with the definitions in the NPPF (see Appendix 11).”</p> <p>Re-numbering of subsequent Reasoned Justification paragraphs to be done.</p> <p>“5.3.109 The first preference for the location of new retail <u>Class E and Sui Generis retail main town centre uses</u> development is within the Primary Shopping Area. Proposals for retail <u>Class E and Sui Generis retail main town</u> uses...”</p> <p>“5.3.13 The Primary Retail Frontages are areas where there should be a particular focus on retail uses. This is because such uses are a key driver of footfall and help to draw shoppers into the centre. Proposals for non-retail uses in these frontages will be resisted unless their approval would be consistent with the aim of maintaining and enhancing the overall functionality, vitality and viability of the town centre. Specific considerations to be taken into account when assessing such proposals in the Primary Retail Frontage include the existing proportion of retail uses, the nature of the proposed use and the location of the unit affected within the Primary Retail Frontage.</p>	

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

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

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	<p>people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible</p> <p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (20372035). Of the overall housing provision of 10,206 9,234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,457 223 (24%) should be affordable. The amount of”</p> <p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2)a of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ adaptable dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. <u>A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.</u>”</p>	<p>Support.</p> <p>Support.</p>
MM022	<p>“2. Proposals for new open market housing developments of 14 10 units or more, <u>or when the number of units is not known, sites of 0.5ha or more,</u> will be required to.....”</p> <p>“6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <u>Furthermore, it is acknowledged that ‘First Homes’ have been introduced by the Government, and fall within the definition of ‘affordable housing’.</u></p>	Support.

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

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

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

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

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

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

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

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

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

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

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	<p>8-7. Any development proposal that may affect one or more asset(s) of ...” Re-number subsequent Policy sections</p>	
<p>MM031</p>	<p><u>Flood Risk</u></p> <p><u>1. The impact of development proposals on flood risk and water management assets will be considered in accordance with case law, legislation and the National Planning Policy Framework.</u></p> <p>1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.</p> <p>Any assessment and mitigation should have regard to:</p> <p>a) the St.Helens Strategic Flood Risk Assessment;</p> <p>b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and</p> <p>c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment Flood Management Plan or the North West River Basin Management Plan.</p> <p>2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:</p> <p>a) within flood zones 2 or 3; or</p> <p>b) on a site of 1 hectare or larger within flood zone 1; or</p> <p>c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or</p> <p>d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.</p> <p>3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:</p>	<p>Support.</p>

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

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

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

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

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

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

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases. <u>In doing so, this Policy will support the Council’s Climate Change Emergency declaration.”</u></p> <p>“8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. <u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, ‘smaller developments’ is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council’s ‘Guidance Notes for the Submission of Transport Assessments’ (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will be determined on a site by site basis.</u> Any significant effects would need to be addressed in line with Policy LPC06.</p> <p><u>“8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u></p> <ol style="list-style-type: none"> <u>1. Electric vehicle charging points at parking spaces;</u> <u>2. Provision of a communal minibus (particularly if electric), and car club space;</u> <u>3. Cycle parking and shower facilities for staff;</u> <u>4. On-site services (e.g. GP surgeries and</u> 	

Main Modification Reference	Change (deleted text in strikethrough; new text underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p><u>shops) to reduce need for off-site movements;</u> <u>5. Personalised Journey Planning services for residents. If employment premises the company could provide incentives for carsharing and minimising car journeys for work;</u> <u>6. Production of sustainable travel information for residents e.g. accurate and easily understandable bus timetables;</u> <u>7. Implementation of a Staff Management Plan to place restrictions on car use by Staff;</u> <u>8. For vehicles generating HGV movements, restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.</u></p>	
MM040	<p>“1. Proposals for food and drink uses (including restaurants, cafes, drinking establishments and the sale of hot food for consumption off the premises) <u>which consist of new built development or those that are not classed as permitted development for Change of Use under use Class E or are Sui Generis</u> will only be permitted where all of the following criteria are met:”</p> <p>“8.30.2 Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses within Classes A3 to A5 of the Use Classes Order1 i.e., restaurants and cafes, drinking establishments and hot food takeaways. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways falling within use Class A5. The policy does not apply to shops within Use Class A1 that sell food for consumption off the premises. The Government introduced a new Use Class E on 1st September 20202 which now groups Restaurants and Cafes within Use Class E. Therefore, proposals to change within the same use class do not require Planning Permission. Paragraphs 1 and 2 of Policy LPD10 only apply to restaurant and café applications where a new unit is proposed or where the existing use class E cannot be demonstrated. Proposals for drinking establishments and hot food takeaways are now Sui</p>	No comment to make.

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

RO1998

[REDACTED]

From: Irene Bennett [REDACTED]
Sent: 05 January 2022 12:02
To: planningpolicy@sthelens.gov.uk
Subject: SHGBA

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.

We endorse the issues raised on behalf of the SHGBA

Tony and Irene Bennett
36 Ecclesfield road
Wa10 5nb

Sent from my iPad

[REDACTED]

From: Irene Bennett <[REDACTED]>
Sent: 12 January 2022 15:48
To: planningpolicy@sthelens.gov.uk
Subject: Planning permission for building on land on Ecclesfield Road

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.

We fully support the objections raised by ECCRA.
What criteria was used that this land makes a low overall contribution to the green belt, and yet as a medium development potential.
It goes on to say that the site comprises a significant green field site, which appears to go against your assertion that it makes a low overall contribution to the green belt.

Mr and Mrs A Bennett
36 Ecclesfield Road
Wa10 5nb

Sent from my iPhone

Planning permission for building on land on Ecclesfield road

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:20

IB

Irene Bennett [REDACTED]

Thu 13/01/2022 15:20

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.

Have originals or copies of any correspondence ie letters, emails, telephone conversations, minutes of meetings, ext. between the owners of the land, developers, council, and Eccra. Mr and Mrs A Bennett Ecclesfield Road.

Sent from my iPhone

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

RO1999

From: [REDACTED]
Sent: 08 December 2021 09:21
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan Consultation

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

Hello

We would like to express our concern regarding the proposed changes to the St Helens Local Plan Main Modifications and in particular their impact on our much valued Green Belt.

Whilst understanding the need to build more residential property in St Helens our Councillors and building developers should be maximising the use of all available brownfield sites before any Green Belt area is even considered for development.

In addition, the views of the local community must be at the heart of the debate on the release of any Green Belt land for development. We suggest that before reclassification of Green Belt land is proposed the agreement of the local community should be sort by the Council and the infrastructure needed to support any development be discussed in detail with those potential effected.

Thank you for the opportunity of expressing our views on this very sensitive subject.

Kind regards

Stephen and Lorraine Roberts
11 The Woodlands
Eccleston Park L34 2TN

Sent from my iPad

RO2000

[REDACTED]

From: Hughes, Christopher H. [REDACTED]
Sent: 06 January 2022 13:52
To: planningpolicy@sthelens.gov.uk
Subject: Bold & Clock Face Action Group - LPSD Main modifications representation
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.

Please find attached representation submitted on behalf of 1600 members of Bold & Clock Face Action Group. I would be grateful if you could acknowledge receipt of this email.

Regards,

Christopher Hughes
Bold & Clock Face Action Group
<http://www.nsg.com/disclaimer>
<https://www.nsg.com/en/about-this-site/privacy-policy>

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.

RO2001

[REDACTED]

From: Sue Wainwright [REDACTED]
Sent: 06 January 2022 18:49
To: planningpolicy@sthelens.gov.uk
Subject: LOCAL PLAN main modifications

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

I wish it to be noted that I endorse and fully support the objections made by Bold and Clock Face action group to the main modifications to the Local Plan.

Susan Whitelock-Wainwright
80 Eastham Crescent, St Helens
WA9 4ER
Sent from my iPhone

RO2002

[REDACTED]

From: Daniel [REDACTED]
Sent: 06 January 2022 23:13
To: planningpolicy@sthelens.gov.uk
Subject: Fwd: Bold and Clock Face Action Group

Follow Up Flag: Follow up
Flag Status: Completed

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>
> I have read through the finding and find them to be valid and agree with the action groups response.

R02003

[REDACTED]

From: Patrick Murphy [REDACTED]
Sent: 06 January 2022 23:23
To: planningpolicy@sthelens.gov.uk
Subject: Bold and Clock Face Action Group

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

RO2004

[REDACTED]

From: Neil Hargate [REDACTED]
Sent: 07 January 2022 07:28
To: planningpolicy@sthelens.gov.uk
Subject: Bold and clock face action group

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I have read through the findings that were identified by the Bold and clockface action group and agree with them all.

Neil Hargate.

RO2005

[REDACTED]

From: kelly [REDACTED]
Sent: 07 January 2022 22:02
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.

Hi

I have read through the findings that were identified by the Bold and Clock Face action group and agree with them all.

Regards
Kelly Hargate

Sent from my iPhone

RO2006

From: Neil Liggett [REDACTED]
Sent: 08 January 2022 08:54
To: planningpolicy@sthelens.gov.uk
Subject: Bold & Clockface Action Group - save our greenbelt

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
Neil Liggett
WA9 4ZH

SAVE OUR GREENBELT

RO2007

[REDACTED]

From: Elizabeth Lloyd [REDACTED]
Sent: 08 January 2022 15:12
To: planningpolicy@sthelens.gov.uk
Subject: Modifications of Greenbelt 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.

To whom it may concern,

Please accept my 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
Elizabeth Lloyd
Bold Hall Nursery

Sent from my iPad

RO2008

[REDACTED]

From: Diane Williams [REDACTED]
Sent: 08 January 2022 16:25
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan Main Modifications

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

Dear Sir / Madam

I am writing to object to the release of Green Belt land in Eccleston Park 3HS Former Eccleston Park Golf Club for development. This should remain in the local plan as protected Green Belt land.

Policy LPA06 of the 2020 to 2035 plan. Brownfield first approach must be adopted with NO Green Belt development until every brownfield site has been identified and developed. This may be more expensive but the cost in terms of future generations in releasing Green Belt re climate change and air quality must not be underestimated.

Yours Faithfully

Diane Williams
20 Swisspine Gardens
The Foxwoods
St Helens
WA9 5UE

[REDACTED]

Sent from my iPhone

RO2009

[REDACTED]

From: Erin Gerrard [REDACTED]
Sent: 08 January 2022 19:04
To: planningpolicy@sthelens.gov.uk
Subject: Local plan (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/madam,

I would like to inform you that I agree with bold and clock face action groups findings and objects to the local plan.

Thanks
Erin

RO2010

[REDACTED]

From: [REDACTED]
Sent: 08 January 2022 19:22
To: planningpolicy@sthelens.gov.uk
Subject: ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA

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 endorse the issues raised on behalf of the SHGBA in the report named above.

Regards,

Lynda Parker

29, Laurel Drive,

Eccleston,

St Helens,

WA10 5JA

From: [REDACTED]
Sent: 08 January 2022 19:47
To: planningpolicy@sthelens.gov.uk
Subject: Response to ST HELENS LOCAL PLAN Main Modifications January 2022

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To whom it may concern,

I endorse the issues raised on behalf of Eccleston Community Residents Association (ECRA) with Windle in the report named above.

Regards,

Lynda Parker

29, Laurel Drive,

Eccleston,

St Helens,

WA10 5JA

RO2011

[REDACTED]

From: Ian Hayhurst [REDACTED]
Sent: 09 January 2022 00:02
To: planningpolicy@sthelens.gov.uk
Subject: Rainhill planning applications on Greenbelt land

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To whom it may concern,
Ian writing to confirm my support for the issues raised by the St Helens Greenbelt Association in respect of St Helens council still considering planning applications to build on Greenbelt land in and around Rainhill, together with the detrimental effect this will undoubtedly have on the already strained infrastructure. To be clear, I am completely against this and would like to voice my objections to all such planning proposals. I would also appreciate a response to confirm receipt of my objections.

Regards

Ian Hayhurst

18 Kendricks Fold, Rainhill, L35 9LX
[REDACTED]

[Sent from the all-new AOL app for iOS](#)

RO2012

From: [REDACTED]
Sent: 09 January 2022 11:09
To: planningpolicy@sthelens.gov.uk
Subject: St Helens green belt association

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

Dear Sir/madam

I am emailing my opinion on what appears to be St Helen's council's greed and determination to destroy green belt across the borough.

I therefore would like you to be aware that I endorse the issues raised on my behalf by SHGBA.

I sincerely hope you take into account the voices of those of us who will have to live with any decisions made by this local authority without what appears to be a care for the knock on effect those decisions make to our day to day lives.

Kind regards

Angela Gregory

15 Mossdale Drive, Rainhill, L35 4NE

Sent from my iPhone

RO2013

From: Mark Worsfold [REDACTED]
Sent: 09 January 2022 14:04
To: planningpolicy@sthelens.gov.uk
Subject: Comment re Main Modifications to the 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

Further to your considerations in relation to the Main Modifications to the Local Plan, I advise that I endorse the issues raised by St Helens Green Belt Association (SHGBA) through their independent report.

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.

Best

Mark Worsfold
5 Ashton Avenue
Rainhill
L35 0QQ

RO2014

[REDACTED]

From: dave wilson [REDACTED]
Sent: 09 January 2022 16:14
To: planningpolicy@sthelens.gov.uk
Subject: green belt

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i endorse the issues raised on behalf of the SHGBA , further how dare you allow the building on any green belt land when [REDACTED] policy is brown field first .. [REDACTED]

[REDACTED] THINK OF YOUR VOTERS AND PEOPLE...

David P Wilson
91 Foxwood
WA9 5UH

RO2015

[REDACTED]

From: Chris Harrison [REDACTED]
Sent: 09 January 2022 21:03
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.

To whom it may concern

I have read through the findings identified by the Bold and Clock Face Action Group and agree with their findings.

Christine Harrison

Sent from my iPad

RO2016

From: Angela Bulger [REDACTED]
Sent: 10 January 2022 06:59
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 have read through the findings which were identified by Residents Against The Florida Farm Developments & Garswood Action Groups. I wish to have this notification logged and recorded as an objection to the proposed developments. I fully support their findings.

Regards

Angela Bulger
35 Springfield Park
Haydock
St Helens
WA110XP

RO2017

[REDACTED]

From: Jeanette Devine [REDACTED]
Sent: 10 January 2022 10:55
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 am writing to support the objections raised by Bold & Clock Face Action Group in response to the St Helens Borough Local Plan (site allocations 4HA 5HA 1EA and 1ES in Bold ward).

Jeanette Devine
[REDACTED]

RO2018

From: Christine Jones [REDACTED]
Sent: 10 January 2022 12:13
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.

We support the comments submitted re the local plan by RAFFD and GRAG

Mr Robert and Mrs Christine Jones
45 Springfield Park
Haydock
St Helens WA11 0XP

regards Christine Jones

RO2019

[REDACTED]

From: Eileen Littler [REDACTED]
Sent: 10 January 2022 14:55
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 wish it be noted that I support the comments made by RAFFD and GRAG in respect of the Local Plan.

Eileen Littler
31 Hamilton Road
Garswood
WN4 0SU

RO2020

[REDACTED]

From: Laura Garvie [REDACTED]
Sent: 10 January 2022 17:05
To: planningpolicy@sthelens.gov.uk
Subject: Rainhill greenbelt land development proposals

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

I am writing to request that the council reconsider development of greenbelt land. There are sufficient areas of previously developed sites that could be redeveloped for housing. It is not an environmentally friendly choice for your local populace if you choose to wipe out green spaces that are the very lungs of the city. This can only create poorer quality of air, worse urban sprawl and a city that lacks any beauty of the natural world. What a shame for our local community and for future generations whose understanding of their environment will be only concrete, buildings, shops and roads. Have a care. We deserve better.

Sincerely
Laura Garvie
35 Sandfield Crescent
Whiston
L35 7 HJ

RO2021

[REDACTED]

From: [REDACTED]
Sent: 10 January 2022 17:28
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 have read through the findings which were identified by Residents Against The Florida Farm Developments & Garswood Action Groups. I wish to have this notification logged and recorded as an objection to the proposed developments. I fully support their findings.

Regards

Anthony Bulger
35 Springfield Park
Haydock
St Helens
WA110XP

RO2022

[REDACTED]

From: [REDACTED]
Sent: 10 January 2022 20:11
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.

Hi

My name is
Karen Pearson

I live at
57 Birch Grove
Garswood
WN40QX

I strongly support the comments made by RAFFD and GRAG as enclosed with the attachment

Thanks
Karen

Sent from my iPad

**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 Developmentss 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.

[REDACTED]

From: [REDACTED]
Sent: 10 January 2022 20:26
To: planningpolicy@sthelens.gov.uk
Subject: Local plan overall response
Attachments: SHGBA MM Response Jan22.docx

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

Hi

My name is
Karen Pearson

I live at 57 Birch grove
Garswood
WN40QX

I endorse the issues raised on behalf of the SHGBA as enclosed with the attached document

Thanks
Karen

Sent from my iPad

ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA

(December 2021)

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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	<u>LPA02, and given the brownfield nature of much of this site, and for the other reasons set out, there are exceptional circumstances justifying the removal of this site from the Green Belt.”</u>	
MM008	<ul style="list-style-type: none"> • “1EA: Omega South Western, Land north of Finches Plantation, Bold; • 2EA: Land at Florida Florida Farm North, Slag Lane, Haydock²² • 6EA: Land west of ...” <p>Delete footnote 22</p> <p>“5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA, and 6EA, 2EA and 8EA) and Policies by LPA10 and <u>LPA12</u> (in the case of sites <u>7EA and 8EA</u>).”</p>	No comment to make.
MM009	<p>“1. In the period from 1 April 2016 to 31 March 2037 5 a minimum of 9,234 10,206 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.”</p> <p>“a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St. Helens or Earlestown Town Centres; and and</p> <p>b) at least 30 dph on all sites outside St. Helens and Earlestown town centres. that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and</p> <p>c) at least 30 dph on other sites that are within an existing urban area. Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area.”</p> <p>“b) If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, taking into account the</p>	<p>Support extended plan period, see previous submissions on housing requirement calculation.</p> <p>Support.</p> <p>The text should be amended to take into account that monitoring could also show a</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

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

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

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	<p>people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible</p> <p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (20372035). Of the overall housing provision of 10,206 9,234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,457 223 (24%) should be affordable. The amount of”</p> <p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2)a of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ adaptable dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. <u>A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.</u>”</p>	<p>Support.</p> <p>Support.</p>
MM022	<p>“2. Proposals for new open market housing developments of 14 10 units or more, <u>or when the number of units is not known, sites of 0.5ha or more,</u> will be required to.....”</p> <p>“6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <u>Furthermore, it is acknowledged that ‘First Homes’ have been introduced by the Government, and fall within the definition of ‘affordable housing’.</u></p>	Support.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Main Modification Reference	Change (deleted text in strikethrough ; <u>new text</u> underlined and bold; changes to diagrams, tables, etc. described in <i>italic</i> text).	SHGBA Response
	<p>in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases. <u>In doing so, this Policy will support the Council’s Climate Change Emergency declaration.”</u></p> <p>“8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. <u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, ‘smaller developments’ is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council’s ‘Guidance Notes for the Submission of Transport Assessments’ (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will be determined on a site by site basis.</u> Any significant effects would need to be addressed in line with Policy LPC06.</p> <p><u>“8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u></p> <ol style="list-style-type: none"> <u>1. Electric vehicle charging points at parking spaces;</u> <u>2. Provision of a communal minibus (particularly if electric), and car club space;</u> <u>3. Cycle parking and shower facilities for staff;</u> <u>4. On-site services (e.g. GP surgeries and</u> 	

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

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

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

St Helens Local Plan Main Modifications – Response of SHGBA

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

RO2023

[REDACTED]

From: [REDACTED]
Sent: 10 January 2022 20:33
To: planningpolicy@sthelens.gov.uk
Subject: SHGBA Report

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 would like to express my support for the SHGBA report and endorse the issues raised.

The development of unnecessary building on green belt land, cannot be justified considering the extent of brownfield land available in the area which is more than adequate to meet recognised needs for the foreseeable future.

Mr William Croft
30 Holt Lane
Rainhill
L358NB

RO2024

[REDACTED]

From: Jonathan Lloyd [REDACTED]
Sent: 10 January 2022 21:00
To: planningpolicy@sthelens.gov.uk
Subject: Fwd: Modifications of Greenbelt 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.

To whom it may concern,

Please accept my 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
Jonathan Lloyd
Bold Hall Nursery

Sent from my iPad

RO2025

[REDACTED]

From: Al Hilery [REDACTED]
Sent: 10 January 2022 22:00
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

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I support the comments made by RAFFD and GRAG.

Al Hillery
24 Avery Rd, Haydock, WA11 OXA

Get [Outlook for Android](#)

RO2026

[REDACTED]

From: Jeanette Teasdale [REDACTED]
Sent: 11 January 2022 01:07
To: planningpolicy@sthelens.gov.uk
Subject: Local plan

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We write to support the comments made by RAFFD & GRAG.

We have been residents in Garswood [REDACTED] and hope that our views are taken into consideration about our community and environment.

Thank you

Jeanette & Jerome Teasdale
43 Elgin Avenue
Garswood WN40RH

Sent from my iPhone

RO2027

[REDACTED]

From: [REDACTED]
Sent: 11 January 2022 08:16
To: planningpolicy@sthelens.gov.uk
Subject: Proposed Main Modification to St Helens Borough Local Plan Consultation

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To whom it may concern,

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

Please accept my endorsement of objections identified in the Bold and Clockface Action Group report regarding proposed developments and future projects that include modification to green belt land within the Bold and Clockface locations.

As part of the public consultation of the proposed modifications to the St Helens Borough Local Plan, I wish to have this notification lodged and recorded as an objection to the proposed developments.

Yours Sincerely,
Gillian Fisher
2 Sommersby Avenue,
St Helens,
WA9 4AZ

RO2028

[REDACTED]

From: Faye McCurdy [REDACTED]
Sent: 11 January 2022 09:32
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

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To whomever it may concern, as a concerned, local resident I'd like to indicate that I support the comments made by RAFFD & GRAG regarding the Local Plan.

Faye McCurdy
29 Hawthorn Avenue
WN4 0QT

RO2029

[REDACTED]

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

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

Please accept this email for my full support for the comments made by RAFFD and CRAG in relation to the following Employment Allowcations:- 4EA, 5EA, 6EA Housing Allocations 1HA, 2HA and 1HS. Thank you. Mr F J Ryan, 32 Billinge Road, North Ashton, Ashton-In-Makerfield, WN40RE Sent from my iPhone

RO2030

[REDACTED]

From: [REDACTED]
Sent: 11 January 2022 14:32
To: planningpolicy@sthelens.gov.uk
Subject: RAFFD and GRAG 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 support the comments made by the RAFFD and GRAG regarding the main modifications to the local plan.

Below are my details

Christopher Pye
8 Oban Drive
WN4 0SJ

Regards

Mr C Pye.

Sent from my iPhone

RO2031

From: Cheryl Rotheram [REDACTED]
Sent: 11 January 2022 14:48
To: 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.

To whom it may concern

I would like to endorse the issues raised in the report of the St Helens Local Plan Main Modifications by the St Helens Green Belt Association .

Cheryl Rotheram
3 Brooklands Road
Eccleston
WA10 5HQ

Sent from my iPad

RO2032

From: [REDACTED]
Sent: 10 January 2022 13:59
To: planningpolicy@sthelens.gov.uk
Subject: representation-form-final MM006
Attachments: representation-form-final.pdf

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.

Regards

Claire Brookes

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

Ref:

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Claire	First name:
Last Name: Brookes	Last Name:
Organisation/company:	Organisation/company:
Address: 50 Ansdale Wood Drive St Helens	Address:
Postcode: WA9 5XN	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

10/01/2022

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

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

Yes (Via Email)

No

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Thursday 13th January 2022** by:

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

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

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

FURTHER INFORMATION

If you need assistance, you can contact us via:

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

4. Which Main Modification does this representation relate to?

Main Modification Reference Number | **MM006**

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.

I would like to object to the planning application in the strongest possible terms for the following reasons:

- i) The development will cause a significant disturbance to the settled and peaceful condition of my property and neighbouring properties being [REDACTED]. The building of the proposed properties on this piece of land, in particular the two detached properties marked by a red circle on the plan below (fig. 1) will, undoubtedly, interfere with our normal functioning in that the amount of light, space and aspect will be significantly compromised. This will cause disruption to our normal daily lives.
- ii) The planning application is in conflict with policy LPD04 main modification 37 as the proposed development will result in a loss of privacy and an adverse and overbearing effect on our home resulting in unduly oppressive living conditions in relation to what we currently have and what we [REDACTED]. There will be a direct impact on daylight on habitable rooms in my property.
- iii) My property [REDACTED] is currently not overlooked by any building whatsoever, not even obliquely. Please see appendix 2 for a photograph of my current outlook. This is what [REDACTED] the house and was the main reason for buying the house. The outlook of the main living areas – living room and two bedrooms, is completely secluded. The proposed development will negatively impact this utterly and completely. One must also take into account the fact that the proposed development will be slightly elevated and so the nature of this sloping land will negatively impact further on our privacy and outlook.
- iv) There is no information regarding the distance of main separation between the main living areas of the closest two properties and my living areas. Are they within an acceptable range according to council guidelines considering the fact that my living areas are currently not overlooked at all?
- v) My property will suffer a significant negative loss of outlook which constitutes a significant negative visual impact of the proposed development. Please see appendix 2 for a photograph of current outlook.
- vi) The proposed development will have a significant negative impact on the character of the properties immediately neighbouring the development. It will completely and utterly

destroy the whole nature of our community. [REDACTED]

[REDACTED] play on the green land immediately adjacent to my property and number [REDACTED]. It has become a community space and there is NO OTHER SPACE FOR [REDACTED] CHILDREN TO PLAY IN ON THIS DEVELOPMENT THAT IS SAFE AND IN SIGHT OF PARENTS.

- vii) The St Helens Local plan which, the planners themselves in section 1.6 of the planning application state is at “advanced enough stage to justify consideration” conserves this land as Greenbelt. They refer to the “soundness” of this plan which safeguards this land until 2037. I would ask that this is adhered to.
- viii) In section 2.4 of the planning application document it is suggested that the farmland is no longer in use. I would like to point out that the land is currently being worked and is currently planted with a crop of cereals.
- ix) The planning application in figure 1 shows an aerial view of the site BEFORE MY HOUSE WAS BUILT which is, in my opinion an attempt to mislead the planning department into thinking that there are no properties bordering the proposed site when there are, in fact several which will be directly and adversely affected.
- x) The planning application does not show any visual representations of the outlook from my house at [REDACTED], despite showing many photographs of the area from every other conceivable angle so I have included a photograph of my outlook taken on 2nd January 2022 in appendix 2.
- xi) The planning application mentions the possibility of roosting bats in the trees along the edge of the site in section 3.8. I would like to confirm that there are large numbers of bats throughout the site in addition to three species of owls (barn owls, tawny owls and little owls) foxes and deer. There is a video of the deer that [REDACTED] took to show this.
- xii) The planning application states that it believes St Helens Council requires this proposed development in order to fulfil its need for housing which is untrue. There is evidence supplied in the updated land supply statement dated May 2021 which shows a surplus of over 300 houses if all currently identified sites are built on which is contrary to [REDACTED] [REDACTED] claims that the immediate delivery of this site is required to meet demand for the 5 year supply of properties.
- xiii) There is no mention of the impact further housing would have on the already problematic drainage issues we have in and around the estate. Adding further houses on the already strained drainage system can and would create flooding issues for current residents. Greenbelt land offers natural drainage solutions. See appendix 3 for what 30 minutes of rain can do to 1 grid. The drains overflow to the point of blocking my drive.

Appendix

Fig. 1

Land off Elton Head Road, St. Helens | 14/12/2021
Outline Planning Application For 109no. Dwellings – Supporting
Planning Statement



3.0 PROPOSED DEVELOPMENT



Appendix 2



Appendix 3



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.**

RO2033

[REDACTED]

From: Ian Howitt [REDACTED]
Sent: 11 January 2022 16:17
To: planningpolicy@sthelens.gov.uk
Subject: Eccleston Park Golf Club

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

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
Mr I H Howitt
L35 6NG

RO2034

From: Julie clark [REDACTED]
Sent: 11 January 2022 16:57
To: planningpolicy@sthelens.gov.uk
Subject: Local plans

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.

Planning department

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

Julie clark
12 Peebles Close
garswood
Wigan.
WN4 0SP

Get [Outlook for iOS](#)

RO2035

[REDACTED]

From: Chris Walsh [REDACTED]
Sent: 11 January 2022 17:30
To: planningpolicy@sthelens.gov.uk
Subject: Local Plan

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

Dear Sir/Madam,

I am emailing you to say I support the comments made by RAFFD and GRAG with regards to the Local Plan.

Christopher Walsh
3 Shaftway Close
Haydock
St Helens
WA110YQ

RO2036

[REDACTED]

From: Joanne [REDACTED]
Sent: 11 January 2022 17:49
To: planningpolicy@sthelens.gov.uk
Cc: [REDACTED]
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 Sirs

Please accept this email as confirmation of my support to the comments made by RAFFD and GRAG to the local plan.

Joanne Bolton
32 Avery Road
Haydock
St Helens
WA11 0XA

Kind regards

Joanne Bolton

RO2037

[REDACTED]

From: [REDACTED]
Sent: 11 January 2022 18:33
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 support the objections raised by RAFFD and GRAG.
Leave the greenbelt untouched and choose the many brownfield sites first.

Mrs Patricia M Round
241 Liverpool Road, Haydock,
WA119RT

Sent from my iPhone