

RO2133

Local Plan

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

A [Redacted]
Thu 13/01/2022 13:38
To: planningpolicy@sthelens.gov.uk



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

Dear Sir/Madam

This email is to advise you that I fully endorse the issues/changes raised by St Helens Green Belt Association, SHGBA, to the Local Plan.

Kind regards

Angela Roberts
9 Nottingham Close
Rainhill
L35 4QZ

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

RO2134

Building on green belt. Epic.

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 13:39

DK

Diana King [REDACTED]
Thu 13/01/2022 13:39
To: planningpolicy@sthelens.gov.uk



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I am behind St helens Green belt association all the way and do not agree with any building on green belt land.

Diana king
135 Stoney Lane
RAINHILL
L359JY

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RO2135



Move to Categorise Undo

Florida Farm planning application - local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 13:44

JN

Judith Nicholson

Thu 13/01/2022 13:44

To: planningpolicy@sthelens.gov.uk



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Hi

I fully agree with and support the comments made by Residents against the Florida Farm Developments and Garswood Residents Action Group in respect of the Local Plan.

I object to the proposed housing development on Florida Farm

Judith Nicholson
22 Avery Road
Haydock
WA110XA

Sent from Samsung Mobile on O2

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RO2136



Move to Categorise Undo ...

Local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 13:46

BM

Barry Mercer

Thu 13/01/2022 13:46

To: planningpolicy@sthelens.gov.uk



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I support the comments submitted by RAFFD and GRAG regarding the Local Plan.

BARRY MERCER
49 LAUREL ROAD
WA110EX

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

RO2137

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 13:50

H HOLDEN [REDACTED]

Thu 13/01/2022 13:50

To: planningpolicy@sthelens.gov.uk



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I fully support the comments submitted by RAFFD and GRAG regarding the Local Plan.

Norma Holden
8 Dearham Avenue
Haresfinch
St Helens
WA11 9NW

Sent from my iPad

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

RO2138

I disagree with releasing Green Belt Land

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 13:52

BB

Barbara Billows [REDACTED]
Thu 13/01/2022 13:52
To: planningpolicy@sthelens.gov.uk



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Dear
planningpolicy@sthelens.gov.uk

I endorse the issues raised on behalf of the SHGBA.

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

I disagree with releasing Green Belt Land. Theres plenty of Brownfield land available.

Kind regards
Barbara Billows
25 wedgewood gardens
St helens WA95GA

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

RO2139

I disagree with releasing Green Belt Land

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:02

JB
John Billows
Thu 13/01/2022 14:02



To: planningpolicy@sthelens.gov.uk; Planning St Helens; Kieran Birch

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Afternoon

I endorse the issues raised on behalf of the SHGBA.

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

I disagree with releasing Green Belt Land. There's plenty of Brownfield land available in St Helen's.

Kind regards
John Billows
25 wedgewood gardens
St helens WA95GA

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

RO2140

I disagree with releasing Green Belt Land

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:07

SB

Sharon Billows [REDACTED]
Thu 13/01/2022 14:07

To: Planning St Helens; planningpolicy@sthelens.gov.uk; [REDACTED]



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Afternoon

I endorse the issues raised on behalf of the SHGBA.

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

I disagree with releasing Green Belt Land. Theres plenty of Brownfield land available.

Kind regards
Sharon Billows
12 Telegraph House
Pinnington place
Huyton
L365XA

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

RO2141

Objection to local plan modifications

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:12

AH

Andy Hatton

Thu 13/01/2022 14:12

To: planningpolicy@sthelens.gov.uk



Action group response t...
742 KB

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

Dear Sir/Madam,

Please accept my notification of support and endorsement of the objection report produced and submitted on behalf of the Bold and Clockface Action Group (attached) 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 also would like to reiterate comments made previously that the local plan will have a significant impact on the Liverpool city region plans to reach carbon zero by 2040. To offset the carbon increase would require an unprecedented level of tree planting. In addition, the recent huge publicity to the Dream statue has highlighted the shortsighted vision of the local plan. I highlighted in my objection that the Bold Forest including the Dream encompasses parkland area the size of Tatton Park and the potential visitors to the park (a significant section sits in the local plan identified for housing and warehouses) would bring huge financial benefits to the Bold area. Much more so than housing estates and warehouses.

Regards
Andrew Hatton

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

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.

RO2142

Objection to local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:15

AH

Andrew Hatton [REDACTED]

Thu 13/01/2022 14:15

To: planningpolicy@sthelens.gov.uk



Action group response t...
742 KB

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Regards
Ann-Marie Hatton

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

Bold & Clock Face Action Group



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Bold and Clock Face Action Group.

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MM009 – page 32 section 42

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CONCLUSIONS ON DEVELOPABILITY

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MM018 – Bold Forest Garden Suburb LPA13

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- 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’.
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Design and layout

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

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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

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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.

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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.

RO2143

Eccleston park

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:41

LH

Louise hagan [REDACTED]

Thu 13/01/2022 14:41

To: planningpolicy@sthelens.gov.uk



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I endorse the issues raised on behalf of the St Helens Greenbelt Association (SHGBA.)

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.

Louise Jackson
212 two butt lane
L35 8pu
Sent from my iPhone

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

RO2144

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 14:48

CS

Craig Smith [REDACTED]

Thu 13/01/2022 14:48

To: planningpolicy@sthelens.gov.uk



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I support the comments submitted by RAFFD and GRAG regarding the Local Plan.

Regards

Craig Smith
25 Patterson Street
Newton Le Willows
WA12 9PZ

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

RO2145

Local plan (modifications)

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:02

KE kristian eccleston [REDACTED]
Thu 13/01/2022 15:02
To: planningpolicy@sthelens.gov.uk



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Dear Sir/Madam
I would like to inform you that I agree with Bold & Clockface action groups findings & objections to the local plan modifications
Regards
K Eccleston

[Sent from Yahoo Mail for iPhone](#)

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

RO2146

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

Our Ref: 0003/Chapel Lane
Your Ref:

By Email Only: planningpolicy@sthelens.gov.uk

Date: 13 January 2022

Dear Ms O'Doherty

St Helens Borough Local Plan Submission Draft: Schedule of Proposed Modifications Representation

Asteer Planning has been instructed by Lovell Partnerships Ltd to prepare representations in response to St Helens Borough Council's consultation on its Local Plan Submission Draft: Schedule of Proposed Modifications.

Asteer Planning represented Lovell Partnerships (on behalf of the landowners) at the Local Plan Examination in Public ("EiP") hearing sessions in May and June 2021 to promote Land at Chapel Lane, Sutton Manor for residential development comprising 100% affordable housing. Chapel Lane, Sutton Manor is identified as Safeguarded Land for Housing in Policy LPA06 and accompanying Table 4.8: Safeguarded Land for Housing in the Submission Draft Local Plan. Asteer Planning supported by Tetlow King and Avison Young promoted the site for allocation as a Strategic Housing Site in Policy LPA05 as part of the EiP.

This letter sets out representations to the Council's Schedule of Proposed Modifications consultation. We respectfully request that these representations are taken into account in the preparation of the future stages of the Local Plan and that Asteer Planning is kept updated by email.

5 Year Housing Land Supply

Main Modification ("MM") 009 proposes that the 5 year housing land supply table is added in Annex 4 to the end of the Reasoned Justification of Policy LPA05 under a new subheading 'Five year housing land supply'.

We understand that in relation to delivering housing, the Council's approach is one of prioritising brownfield land. Whilst we support this approach in principle, in this instance, we consider that the approach of prioritising brownfield land will have serious implications for the actual delivery of open market and affordable housing.

Throughout the EiP, Lovell Partnerships has maintained its objection to the Council's approach through both its hearing statements and its appearance at the EiP in relation to Matter 5 Housing Land Supply. We consider that **the approach is not sound** and that the proposed main modifications (specifically MM009) do not correct this soundness issue. In summary:

1. The Council went into the EiP hearing sessions with a claimed supply of just 4.6 years of housing land as set out in its Updated Employment and Housing Land Supply Information Document (ref SHBC007).
2. Matter 5 was discussed during hearing sessions on Tuesday 15th and Wednesday 16th June 2021, including a "Schedule of SHLAA sites where there is disagreement between the Council and representors on delivery" produced by the Inspectors (ref INSP012).
3. Action points were agreed at the end of the Wednesday 16th June 2021 hearing session (as recorded in the 'Hearing Sessions, Agendas and Action Notes' section of the Local Plan Examination Library).
4. The Inspectors wrote a 'letter on Housing Land Supply and the revised National Planning Policy Framework' (ref INSP013) to the Council on 30th July 2021, within which they made comments in relation to the Council reviewing the claimed delivery from several sites.
5. The Council wrote to the Inspectors on 17th August 2021 (ref SHBC030) with an "updated Housing Land Supply position statement" (SHBC031) in which it **claimed a marginal 5 year housing land supply** of 5.1 years supply of housing land.
6. The Inspectors issued a Post-hearings advice letter (ref INSP014) to the Council on 1st September 2021, within which they instructed the Council to update the Local Plan (Policy LPA05) to reflect the updated tables and trajectory contained in the Council's 17th August letter and Position Statement (ref SHBC030 & SHBC031 respectively).
7. The Council produced a 'Schedule of Main Modifications' (ref SHBC036) for consultation on 18th November 2021. The schedule includes MM009 referred to above, which essentially proposes to insert an updated housing trajectory and tables into the Local Plan. The Council's latest 5 year supply position is included at Annex 4 of the schedule of SHBC036 and replicates the one within SHBC031.

MM009 proposes that the 5 year housing land supply table is added in Annex 4 to the end of the Reasoned Justification of Policy LPA05 under a new subheading 'Five year housing land supply'.

It is clear that **the Council has struggled to get to a position where it claims a marginal 5 year supply position of just 5.1 years**. It has not achieved this through identifying any additional deliverable sites but rather by revisiting its assumptions and calculations relating to the same sites which featured in its 4.6 year housing supply calculation in the Updated Employment and Housing Land Supply Information Document (ref SHBC007). Specifically, the Council has achieved a 5.1 year supply by:

1. Reducing the housing requirement from 486 to 446 by taking past over-delivery into account; and
2. Increasing the claimed supply from 'Housing Allocations' by 26 net.

Lovell Partnerships has not had any opportunity until now to respond to any of the updated information, sites in question, or overall updated position since the closing of the hearing sessions. Having reviewed the Council's updated 5 year housing land supply, we maintain our serious concerns on the soundness of the plan in respect of housing land supply and the implications for delivery of housing over the Plan period. This is one of the lowest housing land supply figures that have ever been proposed at Local Plan examination in the NPPF era. It is self-evidently not robust. It will not be able to withstand/adapt to any change. The loss of a single site or would immediately take the Council below 5 years.

As set out in our Matter 5 Hearing Statement and in verbal representations at the hearing sessions, **the Council has simply not provided robust evidence of deliverability** for several sites within its trajectory and claimed supply.

With such a marginal supply position, the non-delivery of just one site as anticipated by the Council could potentially leave the Council in a position early in the Plan period (and potentially immediately given that the trajectory and 5 year position is base dated 1 April 2021) whereby it is unable to demonstrate a 5 year supply and relevant Local Plan policies will be out-of-date in the context of the NPPF which would engage the presumption in favour of sustainable development.

Furthermore, using past 'oversupply' to reduce the requirement is widely acknowledged to be a 'grey area' in terms of explicit guidance in national policy. Whilst the Council has used past oversupply to reduce the residual requirement in its 5 year supply calculations, this does not reduce the actual housing requirement in the Local Plan. Therefore, at a point in time that any further clarity is given in national policy or guidance, to the contrary of the Council's approach, and the Council comes to update its 5 year supply position, with such a precarious supply position, the Council would not have any flexibility to address this within its 5 year supply calculations.

When considering the tests of soundness set out in Paragraph 35 of the NPPF, the Plan is not sound in the context of 5 year housing land supply because the fragility of its claimed 5.1 year supply of housing land will simply not be effective as providing a sufficiently flexible and robust supply of sites to deliver the Borough's housing requirements.

In order to make the plan sound, and ensure it is sufficiently robust and flexible to cope with any non-delivery from the Council's claimed supply of sites, the Council must allocate deliverable sites, particularly those that will provide a significant proportion of affordable housing, in the areas of the Borough adjacent to the St Helens Core Area which is the greatest area of deprivation, and the most sustainable location in the Borough as acknowledged by the Council at the Matter 3 hearing session.

Affordable Housing

Lovell Partnerships has previously made representations to the EiP via its Hearing Statement for Matter 3 and whilst attending the Matter 3 hearing session. Despite the representations made by Lovell Partnerships on the lack of soundness of the Local Plan in this regard, the Council has not proposed any Main Modifications to address the issues identified. Therefore, we maintain our objection to the Local Plan in relation to the delivery of affordable housing for the following reasons:

1. In seeking to argue that it should not provide for the full affordable housing needs of the Borough through the Local Plan, the Council has referred to the case of *Kings Lynn BC v SSCLG* [2015] 2464 (Admin) and stated that there is no obligation to meet affordable housing needs "in full". As set out in our written representations (Matter 7 hearing

statement (paras 2.7 – 2.13) and Matter 11 (paras 2.21-2.23), this High Court judgment concerned a challenge to a s78 appeal decision on entirely separate grounds (how to account for vacancies and second homes in setting FOAN). The Court was not tasked to address a Local Plan examination nor how to address the issue of affordable housing, This is therefore not a binding legal precedent for how this issue should be addressed at Local Plan examination, and certainly not now under the present NPPF, and in the present circumstances where an acute shortfall has been identified. The only relevant paragraphs are [33] and [35] which confirm that affordable housing need is a “significant factor” and should be “tested” at local plan examination. It is plain from current national policy guidance and as a basic matter of planning practice that affordable housing needs are a matter of fundamental importance to plan-making now. It is vital to ensure that there will be sufficient provision at the examination stage. This has been under-scored very recently by the House of Lords Built Environment Committee Report 1st Report of Session 2021-22 - published 10 January 2022 - HL Paper 132: “76. *There is a serious shortage of social housing, which is reflected in long waiting lists for social homes and a large number of families housed in temporary accommodation*¹.”

2. Tetlow King carried out detailed analysis (Appendix I of Lovell’s Partnerships Matter 7 hearing statement) of the Council’s supply of and approach to delivering affordable housing in the Local Plan, and especially within the next five years. Tetlow King assesses the realistic supply of affordable housing in the Borough for the period 2021/22 to 2036/2037, including large sites within the trajectory and the proposed allocations and also taking into account commuted sums and Right to Buy (RTB) losses. The impact of Right to Buy Losses is a major factor, also recognised in the HoL Built Environment Committee Report, paragraph 67, which noted its impact in the “*continued depletion of the social rented sector.*” **It is clear that the Council is facing a bleak prospect of delivering very few additional affordable dwellings.** The Council is not in any meaningful way seeking to boost the supply of affordable housing, based on Tetlow King’s analysis of the available sites.
3. The Council’s approach to affordable housing will simply not deliver enough affordable housing to address the identified overarching soundness failure in respect of affordable housing provision.
4. When considering the tests of soundness set out in Paragraph 35 of the NPPF, the Plan is not sound because the Council’s approach to delivering affordable housing will fall substantially short of meeting the over-riding current need for affordable housing in the context of NPPF Paragraph 61 and Paragraph 2a-024 of the Planning Practice Guidance².

In order to address the current affordable housing crisis, which will only be exacerbated by the Council’s proposed approach to the provision of affordable housing, the Council must allocate deliverable sites that will provide a significant proportion of affordable housing, particularly in the areas of the Borough adjacent to the St Helens Core Area which is the greatest area of deprivation, and the most sustainable location in the Borough as acknowledged by the Council at the Matter 3 hearing session.

¹ 1st Report of Session 2021-22 - published 10 January 2022 - HL Paper 132

<https://publications.parliament.uk/pa/ld5802/ldselect/ldbuiltenv/132/13202.htm>

² Reference ID: 2a-024-20190220

Chapel Lane, Sutton Manor

MM011 proposes that text relating to Chapel Lane Sutton Manor is added to the reasoned justification with new paragraphs following 4.24.5. The main modification states:

6HS – Land East of Chapel Lane and South of Walkers Lane, Sutton Manor

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 protected woodland and a Local Wildlife Site) are considered able to be satisfactorily addressed.

We support the conclusion that the site makes a ‘low’ overall contribution to the Green Belt purposes and that the sites technical constraints are able to be satisfactorily addressed. However we do not agree that the site has ‘medium’ development potential³. Lovell Partnerships is an experienced house builder and demonstrated in its Matter 4 Hearing Statement supported by a comprehensive Development Statement at Appendix 1 to the Matter Statement that the site is deliverable in the short term. A unique proposal of 100% affordable housing is proposed by Lovell Partnerships which would deliver affordable housing within the first five years of the Plan period making not only a positive contribution towards the Councils 5 year housing supply but also towards its significant and unmet chronic affordable housing needs.

Local Plan Review

The approach to Local Plan proposed in the Schedule of Proposed Modifications Schedule is not clear and it is respectfully requested that clarification is provided by the Council. There are several references to Local Plan Review in the Schedule of Proposed Modifications Schedule which are set out below with Asteer Planning’s commentary below each proposal:

MM002 (Introduction)

In the Introduction Section at paragraph 1.9.1 the following modification is proposed:

*“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”.*

³ A pre-application meeting between the landowners and the Council has been previously held where it was agreed that housing development at site is deliverable. The deliverability of the site for housing was also recognised by the Council in its decision to allocate the site for housing in earlier versions of the Local Plan.

It is requested that the first part of the proposed modification is updated to clarify what is intended by “regular monitoring”. Under the “Plan Reviews” section of the National Planning Practice Guidance (“NPPG”), paragraph: 073 Reference ID: 61-073-20190315 states (with Asteer Planning’s emphasis in **bold**):

“What is the role of the Authority Monitoring Report?”

*Local planning authorities must publish information **at least annually** that shows progress with local plan preparation, reports any activity relating to the duty to cooperate, **any information collected which relates to indicators in the plan, and any policies which are not being implemented**. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been brought into force, and monitor the provision of housing for older and disabled people. **It can help inform if there is a need to undertake a partial or full update of the local plan, when carrying out a review at least every 5 years from the adoption date”.***

To be consistent with the NPPG, the modification should be amended to reflect paragraph 61-073 stating that the Local Plan will be subject to regular monitoring through the publication of information **at least annually** through an Authority Monitoring Report which collects information which relates to indicators in the Local Plan and any policies which are not being implemented.

MM006 (LPA02) and MM011 (LPA06)

The following modification is proposed at MM006 in relation to Policy LPA02 point 5:

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 2037~~5~~, 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 2037~~5~~. 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.***

In addition, the following modifications are proposed at MM011 in relation to Policy LPA06 section 2 and reasoned justification paragraph 4.24.2 as follows:

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 this Plan period will be refused.

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

As set out earlier in this letter, Lovell Partnerships has significant concerns about the Council's ability to demonstrate a 5 year housing land supply. Based on its own figures, the Council can only demonstrate an extremely marginal 5 year supply of 5.1 years. As we have noted above, this is one of the lowest figures that ever been proposed at Local Plan examination in the NPPF era. Lovell Partnerships maintains its position that sites have been included within this calculation which do not meet the definition of deliverable in the NPPF and therefore the Council cannot demonstrate a 5 year housing land supply at the date of adoption. As a result, an update of the Plan is likely to be required immediately.

Paragraph 065 Reference ID: 61-065-20190723 relates to "What can Authorities consider when determining whether a plan or policies within a plan should be updated" and states that Authorities can consider information such as (but not exclusively): conformity with national planning policy and whether the authority can demonstrate a 5 year supply of deliverable sites for housing.

Furthermore, Paragraph: 067 Reference ID: 61-067-20190315 states (with Asteer emphasis in **bold**):

"What are the implications for measuring 5 year supply of housing sites, in circumstances where the strategic policies need updating?"

*Local planning authorities **should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing** against their local housing need in circumstances where strategic policies are more than 5 years old and need updating. **The Framework makes clear that the presumption in favour of sustainable development should apply where an authority cannot demonstrate a 5 year supply of deliverable housing sites**".*

The settlements within St Helens are constrained by the Green Belt. At the Examination, it was the development industry's position that St Helens had overstated the amount of housing that can be delivered and / or developed on brownfield sites within the Plan period. During the Examination, the Council also agreed in answer to Inspector Dakeyne's question that **the most logical sites to consider should additional land be required for housing are the Safeguarded Sites** in Policy LPA06.

As such, it is a significant concern that the Council's main modification in only allowing development to come forwards on Safeguarded Sites is through the safeguarded sites being allocated for housing as part of a partial or full update to the Local Plan. The Local Plan review process proposed by the Council will take some time and during this time the open market and affordable housing needs of the Borough will continue to not be met. It is proposed therefore that due to the very marginal 5 year housing land supply claimed by the Council and the strategy which will lead to affordable housing needs not being met in full, that there should be a mechanism provided in the Local Plan which allows development to come forwards on Safeguarded Sites as soon as possible.

MM009 (LPA05)

The following modifications are proposed at MM009 in relation to Policy LPA05 section 4b) and reasoned justification paragraph 4.18.21 as follows:

*"b) If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, **taking into account the requirements in relation to housing delivery set out in national policy**, a partial or full plan review update will be considered to bring forward additional sites.*

*4.18.21 ... the Council may undertake a Local Plan **update** review to bring forward additional sites such as those ..."*

Lovell Partnerships objects to the wording "*falls significantly below*" in section 4b of Policy LPA05. Paragraph 74 requires that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policy, or against their local housing need where the strategic policies are more than five years old. It has also been set out above that Paragraph 065 Reference ID: 61-065-20190723 states that Authorities can consider information such as (but not exclusively): conformity with national planning policy and whether the authority can demonstrate a 5 year supply of deliverable sites for housing when determining whether a plan or policies within a plan should be updated. There is no reference in either the NPPF or the NPPG to "*falling significantly below*" the required level of housing. It is proposed that the wording in section 4b) of Policy LPA05 is not sound because it is inconsistent with national planning policy and is not effective. It is therefore proposed that the word "*significantly*" is deleted.

Annex 4 LPA05 '5 Year Housing Supply'

The following modification is proposed under the potential action of contingency for LPA05 – Meeting St Helens' Housing Needs for the 5 Year housing land supply indicator:

*"Consider early review of the Local Plan **if there is long term under performance against the 5 year supply**".*

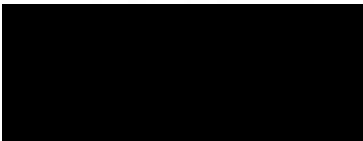
Lovell Partnerships supports the trigger for action which states: "*having fewer than 5 years supply (plus the required buffer) of housing land*. There is no reference in this trigger to housing land supply falling "*significantly*" below the 5 year supply. However, Lovell Partnerships objects to the main modification wording which requires "*long term*" under performance. Firstly, there is no

definition for “long term” under performance. Secondly, national planning policy and guidance does not state “long term” under performance and therefore this modification is not sound because it is not consistent with national planning policy. It is therefore proposed that the main modification is amended as follows:

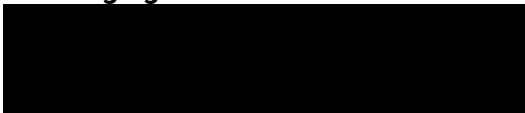
“Consider **Undertake an** early review of the Local Plan ***if the Council cannot demonstrate a 5 year supply of housing land if there is long term under performance against the 5 year supply***”

We respectfully request that these representations are taken into account in the preparation of future phases of St Helens Local Plan and that confirmation of receipt is provided.

Yours Sincerely,



Jon Suckley
Managing Partner



For and on behalf of Asteer Planning LLP

Cc. Russell Drummond – Lovell Partnerships Ltd

RO2147

Eccleston Greenbelt

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:07

WF

Wendy Fenney [REDACTED]

Thu 13/01/2022 15:07

To: planningpolicy@sthelens.gov.uk



ECRA MM Submission_Ja...
108 KB

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

To whom it may concern

I endorse the issues raised on behalf of SHGBA.

Mrs Wendy Fenney
56 Ecclesfield Rd
Eccleston
WA10 5NB

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



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

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

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

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

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton <[REDACTED]>

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: Kayley Farmer [REDACTED] [uk](#)>, Lisa Harris

[David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton [REDACTED]
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED] <[REDACTED]>
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]; Councillor [REDACTED]; Councillor Geoffrey Pearl [REDACTED]; Councillor Mancyia Uddin [REDACTED]; Councillor Lynn Clarke [REDACTED]; David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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RO2148

Green belt

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

BE

Brian Ellis [REDACTED]

Thu 13/01/2022 15:13

To: planningpolicy@sthelens.gov.uk



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

Hi planning committee

I am against the proposed planning for rainhill due to the implications on the local community. The proposed homes being permitted will see pressure for health organisation's the pressure on the nhs and pressure on green land being wasted that people under mental health won't be able to use these green belts for their health. It will also put pressure on the roads due to increase in traffic especially down rainhill road rainhill. The traffic there is unbelievable and with the proposed development then more traffic up and down the road, Plus the proposed development of the junction of warrington road before rainhill bridge will have a grave effect on business i.e the lloyds chemist dentist bridge barbers and many others businesses that will see a decline in customers. These businesses have been an integral part of Rainhill village and Rainhill community. But again Labour council are only interested in selling green belt land to make profit you are not interested in what implications it has on the community

Brian Ellis 98 holt lane rainhill L358nh

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

RO2149

Local Plan Blue category X

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:14

S Thu 13/01/2022 15:14

To: planningpolicy@sthelens.gov.uk

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

Good Afternoon,

Please receive this email from myself as showing my full support of the comments made by RAFFD and GRAG in relation to the Local Plan Main Modifications consultation.

I live in very close proximity to many of the areas concerned, and strongly believe that there needs to be firm opposition against the constant insistence by the Local Council to continually develop on the invaluable Greenbelt land in our areas. Identifying green space areas for development is purely just greed on behalf of the Council who just see it as a license to print money with regard to tax. Every new housing development will boost the coffers of the Council to the tune of around £1,000,000 in Council Tax per year for every 600 houses built within its' jurisdiction. All these new developments bolster the Council Tax funds, yet St. Helens Council every year without fail, increase the Council Tax demand by the maximum 2.99% for its existing residents. This is something which neighbouring councils seem to avoid doing, yet still manage to provide a town worthy of living in.

My local area, lifestyle and way of life for myself and my family has been permanently blighted by the monstrous "blot on the landscape" of the Amazon and Kellogg's warehouse development which appeared with no regard for the local council tax paying residents of Haydock.

Regards,

Neal Hodgkinson
7 Regent Avenue
Haydock
St. Helens
WA11 0HT

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

RO2150

St. Helens Green Belt Association - Main Modification Consultation 8HS

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:16

EH

Edward Hill [REDACTED]

Thu 13/01/2022 15:16

To: planningpolicy@sthelens.gov.uk
[REDACTED]



ECRA MM Submission_Ja...
108 KB

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

Good afternoon,

With regards to the plans being put forward, we would like to endorse the issues raised by ECRA in the attached report.

Mr Edward Hill
Mrs Lisa Hill

31 Ecclesfield Road
Eccleston
WA10 5NE

Regards,
Edward & Lisa Hill

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



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - [sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf](https://www.sthelens.gov.uk/sites/default/files/2020-10/sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf) (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

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

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

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

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton [REDACTED]

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: Kayley Farmer [REDACTED] >, Lisa Harris

[David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton [REDACTED]
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED]
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]; Councillor [REDACTED]; Councillor Geoffrey Pearl [REDACTED]; Councillor Mancyia Uddin [REDACTED]; Councillor Lynn Clarke [REDACTED]; [REDACTED]; David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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RO2151

St Helens green belt association main modification consultation 8HS

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:18

DW

Debbie Waud [REDACTED]

Thu 13/01/2022 15:18

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.

To whom it may concern

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

Mrs Debbie Waud and Mr Martin Waud

63 Ecclesfield Rd
Wa10 5nf

Regards
Debbie

Sent from my iPhone

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

RO2152

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:21

C1 comando 10 [REDACTED]
Thu 13/01/2022 15:21
To: planningpolicy@sthelens.gov.uk



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I support the comments submitted by RAFFD and GRAG regarding the Local Plan.

Lisa Mason
13 Vicarage Drive
Haydock
St.Helens
WA11 0UG

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

RO2153

St Helens Green Belt Association Main Modification Consultant 8HS

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:23

VM

vikki mcomas [REDACTED]

Thu 13/01/2022 15:23

To: planningpolicy@sthelens.gov.uk



ECRA MM Submission_Ja...
108 KB

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To whom it may concern,

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

Mrs Victoria Thomas and Mr Philip Thomas

8 Ecclesfield Road
Eccleston
WA10 5NB

Many Thanksns
Victoria Thomas

Sent from my iPhone

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



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

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- The Local Enterprise Partnership (LEP);
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- Local Nature Partnership". (p.11 & p. 12 CLIS)

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

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

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

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

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

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

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton [REDACTED]

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: Kayley Farmer [REDACTED] Lisa Harris

[REDACTED], [David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton <[REDACTED]>
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED]
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]
[REDACTED] Councillor Geoffrey Pearl [REDACTED] Councillor
Mancyia Uddin [REDACTED]; Councillor Lynn Clarke [REDACTED]
[REDACTED] David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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St Helens Green Belt Association Main Modification Consultant 8HS

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:30

VM

vikki mcomas [REDACTED]

Thu 13/01/2022 15:30

To: planningpolicy@sthelens.gov.uk



SHGBA MM Response Ja...
118 KB

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To whom it may concern,

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

Mrs Victoria Thomas and Mr Philip Thomas

8 Ecclesfield Road
Eccleston
WA10 5NB

Many Thanks
Victoria Thomas

Sent from my iPhone

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R02154

SHGBA response to the Main Modification Document.

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:28

AD

Allan Doyle <[REDACTED]>

Thu 13/01/2022 15:28

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.

Dear Sirs,

My address- 20 Newmarket Gardens. WA9 5FR.

I wish to place on record with you my support and endorsement for the content and details contained within the St Helens Green Belt Association's report undertaken in response to the main modifications report to the local plan.

Green belt land should not be released for building until brownfield sites are fully utilised within St Helens.

Many thanks

Sent from my iPhone

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RO2155

Local Plan Main Modifications Consultation Response – Dated: Thursday Jan 13th at 1530 hours.

Submitted by:

Andy Milligan
3 Villiers Crescent
Eccleston
St Helens
WA10 5HP
[REDACTED]

My comments regarding the Main Modifications are as follows:

MM06

4.6.11 – I believe that there will be an oversupply of housing during plan due to St Helens Council and its neighbouring authorities' proposals. An unnecessary loss of Green Belt will result.

4.6.25 –The Local Plan claims an intention to include open space and landscaping within developments to mitigate climate change factors and comply with the Climate Change declaration. Development of Green Belt is contrary to this and will cause potential flood and pollution problems for existing residents, particularly adjacent to 8HS

4.6.29 – The partnership with English Cities fund should focus on sustainable development and include housing developments within closer proximity to vital infrastructure for St Helens and Earlestown. Remediation of previously developed land in the currently degraded urban areas will avoid waste of Green Belt land.

MM09

8HS because fulfils 3 of the 5 purposes of Green Belt so exceptional circumstances cannot be claimed for its removal from the Green Belt. The Main Mods document indicates that 8HS makes a high overall contribution to the purposes of Green Belt whilst the GB Review says it has a low contribution. I agree with the SHGBA argument (lodged by Kirkwells) that the SHBC exceptional circumstances argument is 'flawed'.

MM011 – Local Plan Housing Supply Target and Proposed New Housing Strategy (Jan 2022)

MM011 is linked to LPA06 indicating a housing target of **486** per year over a 15 year period and beyond to 2037 – 2052, presumably to justify safeguarding Green Belt. Demographic data and ONS housing need data shows this to be highly aspirational.

Additionally there is a new Draft Housing Strategy which has been brought before the council for approval (Wednesday 12th January 2022. (source: St Helens Star online 09.01.22). This Draft Strategy,(presented 1 day before the end of the Main Mods. Consultation) suggests that over a 10 year period 2020 – 2030, there is a projected 5% growth in households and equal to **407** per year, which would produce a Local Plan overbuild of **79** dwellings per year for 10 years.

Such disparity must be questioned and a clear decision made on the Housing Need. This revision to 407 must render the Local Plan unsound.

Safeguarding Green Belt, in the short and medium term will become unnecessary if the **407** target is adopted and longer term Brownfield First Policy projects can produce the results needed and enforce the protection of Green Belt. Government announced a Brownfield Land Release fund on 12.10.21 and the non-allocated funds are being streamed through a bidding process. Relevant funding pots are in play and much could be gained from our relationships within the Liverpool City Region (LCR). However STHBC have a Contaminated Land Inspection Strategy (CLIS) – it is a strategy in name and now there needs to be transparency through documented processes and documented actions. Over 6000 sites have been awaiting inspection since 2017.

The need to reclassify Green Belt to Safeguarded land could be entirely eliminated if this happens.

MM011 – Habitat Regulation Assessment (HRA) October 2021

This document states that 8HS is of importance to wildlife and suggests that development of this land will impact negatively on population. By leaving 8HS as Green Belt habitat and welfare can be protected.

MM012 – 8HS Access

Modification suggests access to/from the development to the strategic network would be 'as a last resort', yet the 'developer plan' shows a roundabout on the A580/Houghtons Lane junction. This is a contradiction in viability bringing into question the validity of the Green Belt Review.

MM026 – Proposed Nature Conservation Supplementary Planning Document (Oct 2020)

This is still in draft form and on final may contain information pertinent to 8HS/Green Belt. The draft status detracts additionally detracts from the validity of the plan.

In conclusion therefore I do not consider there to be a justified need to remove 8HS for development in the next 15 years nor should it be designated as a Safeguarded plot for longer term development.

RO2156

Main Modifications Consultation - Parkside East Green category

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MH **Matthew Hill**
 Thu 13/01/2022 15:36
 To: planningpolicy@sthelens.gov.uk



Freightliner - letter to St ...
 565 KB

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Dear Sirs,

Please find attached Freightliner's response to The St Helens Local Plan Main Modifications. We are the supporting anchor Freight Operating Company working with Almcors (previously known as iSec) as the promoters of the land at Parkside East.

I would be grateful if you could acknowledge safe receipt of our response, and please contact me if you need anything further at this stage.

Kind regards

Matt
 Matthew Hill MRICS
 Group Property Manager
 Freightliner Group Limited



Web: www.gwrr.co.uk

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a Genesee & Wyoming Company

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

Sent by electronic mail



13 January 2022

Dear Sirs,

St Helens Borough Local Plan 2020 - 2035 (Submission Version): Freightliner Response to Proposed Main Modifications Consultation

Freightliner is working closely with the promoters of Parkside East (iSec, now known as Almcors). As noted in previous submissions to the local plan examination, Freightliner is the supporting anchor Freight Operating Company identified for the proposed rail terminal facilities at Parkside East. Details in relation to Freightliner's business and the geographical and other benefits of Parkside East as an opportunity for major new rail freight facilities, have already been provided to the local plan examination, including our previous supporting letter dated 8th June 2021 (SHBC016).

For brevity, this letter does not seek to repeat the points raised previously although by way of an update, since June last year we have continued our work with the promoters and develop further the potential options for the rail freight facilities at Parkside East.

The purpose of this letter is to reiterate our support for the proposed SRFI at Parkside East, including the suggested main modification to Policy LPA10 which is proposing an additional requirement [new criterion (j)] regarding the need for the timely delivery of rail terminal facilities as part of the overall development. We also support the additional / modified wording proposed in the response by Almcors in relation to Exceptional Circumstances (MM007, paragraphs 4.12.29 - 4.12.31).

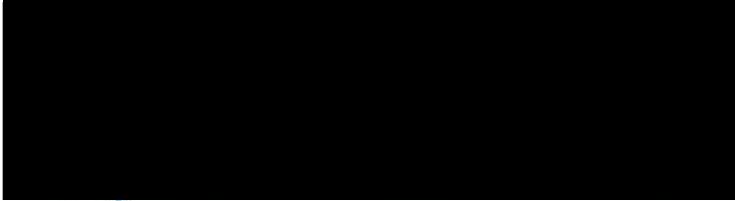
The proposed wording of Policy LPA10 (j) rightly does not seek to prescribe, at this early stage, precisely when rail freight infrastructure needs to be in place. The suggested wording allows for a pragmatic approach, which is important for a number of reasons. The proposals for the rail terminal are still being developed and the design and technical railway operational matters will need to be agreed with Network Rail through their PACE governance process (which has replaced the previous Network Rail GRIP process). It can take several years from starting this technical Network Rail approval process to the facility becoming operational.

As worded, the new criterion would therefore not unnecessarily delay the provision of an element of employment development at the site whilst the rail terminal is being progressed with Network Rail and constructed.

This principle is similar to that adopted for the development of the SRFI at iPort Doncaster and East Midlands Gateway, where in both cases, having existing employment at the site has proven beneficial in providing an existing customer base for the rail terminals at their time of opening. Both sites have quickly established a growing network of rail freight services, serving companies on site and in the surrounding area.

It is Freightliner's intention to develop the new rail terminal at Parkside East as quickly as possible. We do however recognise that there may be a need to phase the development to allow some warehousing before completion of the terminal as part of a comprehensive phasing strategy.

I trust that this information is of assistance. If you have any queries or require any additional information, please do not hesitate to contact me.



Chris Lawrenson
Managing Director, Terminals
Genesee and Wyoming UK/Europe

RO2157

Re attached 'Reps Re Main Mods to Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:39

RJ

Rita James [REDACTED]

Thu 13/01/2022 15:39

To: planningpolicy@sthelens.gov.uk



Reps Re Main Mods to L...
130 KB

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Hello

We wish to make it known that we agree with the responses and comments in the attached document. St Helens Council needs to rethink these plans and make substantial changes.

Regards

Rita James
Terry James
163 Liverpool Road
Haydock
WA11 9RX

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■

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 his application would be granted that prior to the planning committee hearing, and without planning permission, he 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.

RO2158

cleston Park Golf Club -Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:40

LC

Louise Clarke [REDACTED]
Thu 13/01/2022 15:40
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.

Dear sir/madam

Please note we endorse all the points raised on behalf of SHGBA.

Regards

Stephen Clarke
Louise Clarke
6 Field Way
Rainhill
L35 4QB

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

RO2159

LOCAL PLAN

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:47

GH

Gill Harrison : [REDACTED]
Thu 13/01/2022 15:47
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.

Name: Mr John and Mrs Gillian Harrison

Address: 41, Vicarage Drive, Haydock

Postcode: WA11 0UG

To Whom It May Concern,

I would appreciate it if you would add our names to the list of those who disagree with the proposed developement of Florida Farm and support the comments made by RAFFD and GRAG.

Thankyou,

Gillian Harrison

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

RO2160

Eccleston Community Residents Association - Main Modification Consultation 8HS

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:48

AA

Adam Anders [REDACTED]

Thu 13/01/2022 15:48

To: planningpolicy@sthelens.gov.uk



ECRA MM Submission_Ja...
108 KB

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

To whom it may concern,

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

Mr Adam Anders & Miss Emma Case

59 Ecclesfield Road
Eccleston
WA10 5NF

Regards,
Adam

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



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

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

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

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

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton <[REDACTED]>

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton <[REDACTED]>
To: Sean Traynor <[REDACTED]>
Cc: Kayley Farmer <[REDACTED]>, Lisa Harris

[David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton <[REDACTED]
[REDACTED]@[REDACTED].gov.uk>
Cc: Councillor Michael Haw [REDACTED] Councillor Teresa Sims
[REDACTED] Councillor Geoffrey Pearl [REDACTED] Councillor
Mancyia Uddin [REDACTED] Councillor Lynn Clarke
[REDACTED] David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

RO2161

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:50

RK

Rachael Kilgallon

Thu 13/01/2022 15:50

To: planningpolicy@sthelens.gov.uk



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

I am writing to confirm that I agree with comments made by Residents against the Florida Farm Developments and Garswood Residents Action Group in respect of the Local Plan.

Rachael Kilgallon
10 The Hedgerows
Haydock
Wa11 0WG

Sent from my iPhone

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

RO2162

Local Plan Blue category

- Flag for follow up. Start by 18/01/2022. Due by 18/01/2022.
- Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:51

IB I&k"s Blue [Redacted] Thu 13/01/2022 15:51 To: planningpolicy@sthelens.gov.uk

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

Good Afternoon,

Please receive this email from myself as showing my full support of the comments made by RAFFD and GRAG in relation to the Local Plan Main Modifications consultation.

I live in very close proximity to many of the areas concerned, and strongly believe that there needs to be firm opposition against the constant insistence by the Local Council to continually develop on the invaluable Greenbelt land in our areas. Identifying green space areas for development is purely just greed on behalf of the Council who just see it as a license to print money with regard to tax. Every new housing development will boost the coffers of the Council to the tune of around £1,000,000 in Council Tax per year for every 600 houses built within its' jurisdiction. All these new developments bolster the Council Tax funds, yet St. Helens Council every year without fail, increase the Council Tax demand by the maximum 2.99% for its existing residents. This is something which neighbouring councils seem to avoid doing, yet still manage to provide a town worthy of living in.

My local area, lifestyle and way of life for myself and my family has been permanently blighted by the monstrous "blot on the landscape" of the Amazon and Kellogg's warehouse development and the trucks which appeared with no regard for the local council tax paying residents of Haydock.

With the Amazon trucks here 24/7 filling up lay-bys and running red lights and also coming into the estate for a cut through when the A580 is busy the roads are not built for this volume of traffic . A new estate which will bring possibly 500/1000 cars if the residents have 1 possibly 2 cars each . This volume of traffic would clog an already overloaded road network with more cars, vans and POLLUTION

Regards,

Sylvia Hodgkinson
 7 Regent Avenue
 Haydock
 St. Helens
 WA11 0HT

Reply | Forward

RO2163

Proposed Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 15:52

AO

Adam Onyett [REDACTED]

Thu 13/01/2022 15:52

To: planningpolicy@sthelens.gov.uk



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

Good afternoon

Further to the Proposed Main Modifications to the Local Plan, I, Adam Onyett of 37 Wedgewood Gardens, St Helens WA9 5GA and my wife Nicola Onyett (of the same address), wish to endorse the issues raised by St Helens Green Belt Association in their recent response report 'ST HELENS LOCAL PLAN MAIN MODIFICATIONS RESPONSE OF SHGBA'.

Regards
Adam Onyett

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

RO2164

Response to St Helens Local Plan Main Modifications

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:08

BW

barb walsh [REDACTED]

Thu 13/01/2022 16:08

To: planningpolicy@sthelens.gov.uk



ECRA MM Submission_Ja...
108 KB

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

Re above;

Mr Thomas Walsh and Mrs Barbara Walsh of 2 Sandfield Road, Eccleston, St Helens WA105LS, fully endorse the submissions of the Ecra group working on the residents behalf.

[REDACTED]

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



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - [sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf](https://www.sthelens.gov.uk/sites/default/files/2021-12/sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf) (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

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

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

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

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton [REDACTED]

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

Cc: Kayley Farmer [REDACTED] >, Lisa Harris

[David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton <[REDACTED]>
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED]
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]
[REDACTED] Councillor Geoffrey Pearl [REDACTED] Councillor
Mancyia Uddin [REDACTED]; Councillor Lynn Clarke
[REDACTED]; David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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RO2165

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:14

TP

Tracey Peacock [REDACTED]
Thu 13/01/2022 16:14
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.

Dear Sir/Madam,
I am sending this email in support of the comments submitted by RAFFD and GRAG, regarding the local plan.
I believe that green belt land should not be released for building unless no other options. Brown field sites should be used first.
Yours faithfully,
Tracey Peacock
5 Fairclough Street
Newton-le-Willows
Merseyside WA129QF

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

RO2166

Local Plan Main Modifications - Response

This message was sent with High importance.
Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:25

BO Barry O'Neile [Redacted]
Thu 13/01/2022 16:25
To: planningpolicy@sthelens.gov.uk



BRO MM Submission_Ja...
96 KB

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

Please find attached my response to the Local Plan Main Modifications Consultation.

Barry O'Neile
3 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

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

INTRODUCTION

I believe the plan is not sound and needs to be modified, specifically that the parcel of Green Belt 8HS in Eccleston and Windle should NOT be removed for development in the next 15 years nor safeguarded for longer term development. I support the response from ECRA with Windle as follows:

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

A rolling programme of detailed inspections commenced in 2009 and is reviewed annually. Notably the progress has been reactive rather than proactive; during the last 10 years the programme has been entirely as stated in the strategy, i.e. "Much of the action taken to deal with land

contamination has been development-led, through the planning and development management process.” (p.33 CLIS).

SHMBC published a statement of Contaminated Land (CL) sites, 2015, shown as Table 35 (Appendix 1) – Brownfield and Contaminated Land. The table illustrates that 3,170 ha of the lowest priority contaminated land exists in St Helens, whilst the SHLPSD states that 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need. **This area equates to less than 7% of the 3,170 ha CL. Hence the need for reclassification of Green Belt to Safeguarded land could be totally eliminated if the process outlined in the Strategy (CLIS) was rigorously adopted.**

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton [REDACTED]

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: Kayley Farmer [REDACTED] Lisa Harris

[REDACTED], [David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

Kind Regards

Sean Traynor

Director of Strategic Growth

Place Services | St.Helens Council | Town Hall | Corporation Street | St.Helens | Merseyside | WA10 1HP



From: Su Barton [REDACTED]
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED]
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]; Councillor Geoffrey Pearl [REDACTED]; Councillor Mancyia Uddin [REDACTED]; Councillor Lynn Clarke [REDACTED]; David Wainwright [REDACTED]
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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RO2167

Local Plan objection

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:27

DW

David Williams [REDACTED]
Thu 13/01/2022 16:27
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.

Dear Sir or Madam,

I would like it to be noted that I object to the updates to the local plan and would like it noted that I support the comments made by RAFFD and GRAG in opposing these changes.

Yours faithfully

Mr. David Williams
168 Booths Brow Road
Garswood
WN4 0NG

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

RO2168

Public consultation re proposed development.

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:31

ST

susan taylor [REDACTED]

Thu 13/01/2022 16:31

To: planningpolicy@sthelens.gov.uk



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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
Sue Taylor
5 Gorse Lane WA9 4XA.

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

RO2169

Local Plan - Main Modifications Consultation

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:32

pat_oneile : [REDACTED]
Thu 13/01/2022 16:32
To: planningpolicy@sthelens.gov.uk



ECRA MM Submission_Ja...
128 KB

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

I hereby endorse and fully support the views expressed by ECRA and Windle in their submission to the Planning department regarding the Local Plan main Modifications.
Please find attached a copy of their submission.

Mrs Patricia O'Neile
3 Ecclesfield Road
Eccleston
St Helens WA10 5LU

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



ECRA

**ECCLESTON COMMUNITY RESIDENTS
ASSOCIATION TOGETHER WITH WINDLE**

Response to
ST HELENS LOCAL PLAN
Main Modifications
January 2022

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

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

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

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

Report from Kirkwells - SHGBA Response to Main Modifications

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

In our initial report, ECRA demonstrated and maintain that:

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

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

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

ECRA Comments on Main Modifications

MM001 to 005 – no comment

MM006

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

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

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

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

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

MM007 - 008 No comment

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

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

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

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

MM010 No comment

MM011

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

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

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

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

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

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

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

Documents - [sd019-st-helens-council-draft-nature-conservation-spd-2020.pdf](#) (sthelens.gov.uk)

MM012 St Helens Council have added the following in bold:

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

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

MM013 – 025 No comment

MM026 St Helens Council have added the following in bold:

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

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

MM027 - 046 No comment

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

Appendix 1

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

Contaminated, Previously Developed and 'Brownfield' Land

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

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

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

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

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

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

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

SHMBC published a statement of Contaminated Land (CL) sites, 2015, shown as Table 35 (Appendix 1) – Brownfield and Contaminated Land. The table illustrates that 3,170 ha of the lowest priority

contaminated land exists in St Helens, whilst the SHLPSD states that 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need. **This area equates to less than 7% of the 3,170 ha CL. Hence the need for reclassification of Green Belt to Safeguarded land could be totally eliminated if the process outlined in the Strategy (CLIS) was rigorously adopted.**

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

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

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

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

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

“The SIF will support projects that:

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

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

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

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

forward, then it is obviously welcomed. ECRA equally trusts that findings/outcomes of this pilot will mitigate the moves to safeguard land.

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

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

ECRA is concerned that:

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

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

Appendix 2

Fwd: RE: Major Modifications to the Local Plan

Su Barton <[REDACTED]>

16/11/2021 10:40

To Sean Traynor

Good Morning Mr. Traynor,

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

kind regards,

Su Barton

Communication Lead for ECRA, with Windle

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

From: Su Barton [REDACTED]

To: Sean Traynor [REDACTED]

Cc: Kayley Farmer [REDACTED] >, Lisa Harris

[David Wainwright](#)

Date: 01 November 2021 at 13:32

Subject: RE: Major Modifications to the Local Plan

Dear Mr Traynor,

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

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

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

How many sites have been inspected since 2017?

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

Is there a priority list of sites to be inspected?

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

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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

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

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

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

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

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

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

Kind Regards

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



From: Su Barton [REDACTED] >
Sent: 10 October 2021 18:13
To: Councillor David Baines [REDACTED]
Cc: Councillor Michael Haw [REDACTED]; Councillor Teresa Sims [REDACTED]; Councillor Geoffrey Pearl [REDACTED]; Councillor Mancyia Uddin [REDACTED]; Councillor Lynn Clarke [REDACTED]; David Wainwright [REDACTED] >
Subject: Major Modifications to the Local Plan

Dear Councillor Baines,

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

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

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

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

regards,

Su Barton

Communication Lead for ECRA, with Windle

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RO2170

Re local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:34

JM

Jill Mclindon [REDACTED]

Thu 13/01/2022 16:34

To: planningpolicy@sthelens.gov.uk



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To whom it may concern

Please accept my notification of support and endorsement of objection with regard to proposed developments and future projects within the bold clock face locations and give notice and support to the report produced and submitted on behalf of the Bold and Clockface Action Group

J Mclindon

Sent from my iPad

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

RO2171

Local Plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:39

JW

Jane Wilcock [Redacted]
Thu 13/01/2022 16:39
To: planningpolicy@sthelens.gov.uk
[Redacted]



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My name is Jane Wilcock and my address is:
6 The Fairways, Ashton-in-Makerfield, Wigan WN4 0YX

My partner, Sean Hollowed who also resides at the above address, and I fully support the comments made by RAFFD and GRAG.

We would also like to make additional comments of our own in view of the site development on 6EA - land west of Millfield Lane, south of Liverpool Road and North of Clipsey Lane being directly behind our property.

The Plan has not considered the Sustainability Assessment (SA) Framework and it's objectives, notably: SA3 To improve air quality in St. Helens; SA7 Landscape and SA17 To improve poverty and social exclusion. Indeed, the development on 6EA would have an adverse effect on objectives SA3 and SA7.

With regards to SA17, the Plan fails to mention that the development site is located within meters of properties with minimum value of £550,000.00 - not an "area falling within the 20% most deprived population in the UK" as stated within the Plan.

We can already see the impact on residential properties following the building of Amazon as part of the FFND. Was there ever an assessment completed on the impact on residential properties before planning permission was granted for this? Will there be such an assessment for those impacted by the site development on 6EA?

Jane Wilcock & Sean Hollowed

Sent from my iPad

Reply | Reply all | Forward

RO2172

Local plan

Label: 2 Year Email Retain and Delete (2 years) Expires: Sat 13/01/2024 16:50

SB

Simon Broome [REDACTED]

Thu 13/01/2022 16:50

To: planningpolicy@sthelens.gov.uk



Reps Re Main Mods to L...
25 KB

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

Please take this email as evidence of my support for the comments made by RAFFD and GRAG in regard to the local plan. For avoidance of doubt I attach their comment for which I am supporting. I am totally against the continued plans for removal of land from green belt for reasons which purport to be exceptional circumstances but which I disagree fall into this category.

Many thanks

Simon Broome

2 Askett Close
Haydock
St Helens
WA11 0FH

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

■

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 his application would be granted that prior to the planning committee hearing, and without planning permission, he 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.

RO2173

Haydock developments (off Slagg lane)

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

PH

Pam Herd [REDACTED]

Thu 13/01/2022 16:58

To: planningpolicy@sthelens.gov.uk



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We support the comments made by RAFFD and GRAG.

Mr Keith Herd.
18 Avery road.
Haydock
WA11 0XA

Sent from my iPhone

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

RO2174

Local plan

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

GW

Gary Wynne [REDACTED]

Thu 13/01/2022 16:58

To: planningpolicy@sthelens.gov.uk



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I support the comments made by RAFFD and GRAG.

Thank you

Gary Wynne
51 Legh Road
Haydock
WA11 0EH

Sent from my iPhone

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RO2175

Local plan

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

PC

Philip Corcoran [REDACTED]
Thu 13/01/2022 16:58
To: planningpolicy@sthelens.gov.uk



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I agree with the comments of raffd and grag

Kathleen corcoran
16 avery Rd
Haydock
St helens
Wa110xa

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

RO2176

LP Modifications

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

FW Francis Williams [redacted]
Thu 13/01/2022 16:59
To: planningpolicy@sthelens.gov.uk



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25 Lester Drive, Eccleston.

I endorse the report of St Helens Green Belt Association.

I also note:

Whilst Policy LPA 01 promotes sustainable development, it is unclear how the safeguarding of the most versatile agricultural land complies with the concept of sustainability. Policy LPA06 does not explain how earmarking land for development beyond the plan, when those needs cannot be known, is sustainable.

“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

UN World Commission on Environment and Development

Earmarking land for construction development years into the future, in times of great change, when we cannot possibly assess our needs in terms of potential massive loss of agricultural land through rising sea levels, and ever-diminishing biodiversity, makes no sense. Surely, if we are to manage our resources carefully, we should assess our needs beyond the period of the new Local Plan much nearer the next one. To remove Green Belt protection from land, deciding that it should be developed years from now, makes no sense.

For Policy LPC 06, there is an assumption that mitigation is possible without any firm proposals. Urbanisation of the countryside leads to loss of habitat, fragmentation of ecosystems, isolation of populations and commensurate species decline.

Yours faithfully

Francis Williams

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

RO2177

[REDACTED]

From: D Williams <[REDACTED]>
Sent: 06 January 2022 23:11
To: planningpolicy@sthelens.gov.uk
Subject: Bold and Clock Face Action Group

Follow Up Flag: Follow up
Flag Status: Flagged

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

RO2178

From: Councillor Susan E Murphy
Sent: 19 November 2021 13:41
To: Christine Yates; planningpolicy@sthelens.gov.uk
Subject: Re: REPRESENTATION Local Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Christine

Thanks for this information, I agree with your comments

Best wishes

Sue

From: Christine Yates [REDACTED]
Sent: 19 November 2021 12:28
To: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>; Councillor Susan E Murphy [REDACTED]
Subject: REPRESENTATION Local Plan

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Please find below my representation on the local plan modifications.

Page 136

1HA - Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood

1. Correction - Garswood Road not Drive
2. Add to point (d) after 'station' to make it fully accessible (including for disabled persons)

Currently the Garswood Station is not fully accessible by disabled persons along with the bus stops in the area adding the above will bring it inline with point (c) as what is the point of having accessible buses and not an accessible local rail service. Improving access to local transport will fit the climate change agenda.

Christine Yates
21 Argyll Close
Garswood
WN40ST