



ST HELENS
BOROUGH COUNCIL

CONSULTATION STATEMENT

REGULATION 22 (C) OF THE TOWN & COUNTRY
PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 (AS AMENDED)

MARCH 2020

CONTENTS

ABBREVIATIONS	5
1. Introduction	6
2. Statement of Community Involvement	7
2.1 Duty to Cooperate	8
2.2 Statement of Common Ground	9
3. Previous Consultations on the St Helens Borough Local Plan	10
3.1 Initial Preparation	10
3.2 St Helens Local Plan Scoping – January 2016 to March 2016	10
3.4 Methods of Consultation	11
3.5 Main Issues raised at Scoping Stage	11
3.6 How the Main Issues raised at Scoping Stage have been taken into account	12
3.7 St Helens Local Plan 2018-2033 Preferred Options – December 2016 to January 2017	12
Table 1: Public Engagement Sessions at Preferred Options Stage	13
3.8 Main Issues Raised at Preferred Options Stage	14
3.9 How the Main Issues raised at Preferred Options Stage have been taken into account	14
3.10 Call for Sites	15
4. The St Helens Borough Local Plan Submission Draft (Reg 19)	17
4.1 Introduction	17
4.2 Consultation	18
Table 2: Public Engagement Sessions at Publication Stage	19
4.3 Responses	20
Table 3: Respondents Chosen Method of Submission	21
4.4 Guide for Local Plan Examinations Update June 2019	22
Table 4: List of representors whose personal details have been redacted (110)	22
Table 5: List of representors who have not provided full name or address details (33)	23
4.5 Conclusions inevitable	23

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

5. Key and Main Issues (by Chapter, Policy and Site) including Council Response and Amendments	24
5.1 Introduction.....	24
5.2 Summarising Representations	24
5.3 Summary Statement of Key Issues	26
5.4 Main Issues Table	30
APPENDIX 1: LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT SCOPING STAGE (REGULATION 18)	232
APPENDIX 2: SCOPING LETTER ON HOW THOSE BODIES AND PERSONS WERE INVITED TO MAKE REPRESENTATIONS UNDER REGULATION 18	237
APPENDIX 3: LOCAL PLAN SCOPING CONSULTATION RESPONSE FORM	239
APPENDIX 4: POSTER FOR SCOPING STAGE.....	246
APPENDIX 5: NEWSPAPER ARTICLE AT SCOPING STAGE	247
APPENDIX 6: SUMMARY OF REPRESENTATIONS ON ST. HELENS LOCAL PLAN SCOPING CONSULTATION 20 TH JANUARY – 2 ND MARCH 2016	248
APPENDIX 7: LIST OF THOSE WHO MADE REPRESENTATIONS AT LPPO STAGE ...	249
APPENDIX 8: LETTER SENT OUT AT LPPO STAGE	251
APPENDIX 9: COMMENTS FORM & GUIDANCE NOTE AT LPPO STAGE.....	252
APPENDIX 10: LPPO 2018-2033 ARTICLES AND ADVERTS IN THE LOCAL NEWSPAPERS.....	253
APPENDIX 11: CALL FOR SITES FORM	255
256	
APPENDIX 12: A SUMMARY OF THE MAIN ISSUES RAISED BY THE REPRESENTATIONS MADE PURSUANT TO REGULATION 18, (LOCAL PLAN PREFERRED OPTIONS REPORT OF CONSULTATION (REG 18) DECEMBER 2018)..	260
APPENDIX 13: LPSD COMMENTS FORM & GUIDANCE NOTE.....	261
APPENDIX 14: STATEMENT OF REPRESENTATION	269
APPENDIX 15: EXAMPLES OF POSTERS AND LEAFLETS DISTRIBUTED DURING THE LPSD CONSULTATION	271
APPENDIX 16: SITE NOTICES DISPLAYED NEAR TO PROPOSED ALLOCATED AND SAFEGUARDED EMPLOYMENT AND HOUSING SITES WITHIN THE LPSD 2020-2035	273

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

APPENDIX 17: ARTICLES AND ADVERTS IN THE LOCAL NEWSPAPERS AT LPSD...	274
APPENDIX 18: INDEX OF REPRESENTOR NAMES, REFERENCE NUMBERS AND REPRESENTATION NUMBER(S) AT LPSD STAGE	276
APPENDIX 19: ST HELENS COUNCIL AND THE PLANNING INSPECTORATE JOINT STATEMENT PUBLISHED IN OCTOBER 2019	277
APPENDIX 20: SUMMARY TABLE OF THE NUMBER OF REPRESENTATIONS ATTRIBUTED TO EACH SECTION OF THE PLAN AND PROPOSED DEVELOPMENT SITES.....	278
APPENDIX 21: KEPPIE MASSIE'S RESPONSE TO COMMENTS SUBMITTED BY GRASSCROFT SOLUTIONS LTD. (REF: RO1154)	284
APPENDIX 22: KEPPIE MASSIE'S RESPONSE TO COMMENTS SUBMITTED BY TURLEY (REF: RO1959).....	285
APPENDIX 23: CONTINUED ENGAGEMENT WITH NATURAL ENGLAND AND HIGHWAYS ENGLAND	286

ABBREVIATIONS

BFPAAP	Bold Forest Park Area Action Plan
CfS	Call for Sites
dpa	dwellings per annum
dph	dwellings per hectare
EVA	Economic Viability Assessment (2019)
GBR (2018)	Green Belt Review 2018
GBP	Green Belt Parcel
ha	Hectares
HBF	Home Builders Federation
IDP	Infrastructure Delivery Plan
LCR	Liverpool City Region
LPA	Local Planning Authority
LPPO	Local Plan Preferred Options
LPSD	Local Plan Submission Draft
NPPF	National Planning Policy Framework (February 2019)
PPG	Planning Practice Guidance
S106	Section 106 contributions
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SRFI	Strategic Rail Freight Interchange
SHELMA	Strategic Housing & Employment Land Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPZ	Source Protection Zone

1. Introduction

This Consultation Statement accompanies the St Helens Borough Local Plan Submission Draft (LPSD) at the stage of its submission to the Planning Inspectorate for Examination in Public. The Statement describes how St Helens Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan; together with the key and main issues raised by representations, and where appropriate the Council's response.

This Statement has been prepared in accordance with Regulation 22. (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires a statement to be submitted to the Planning Inspectorate, setting out:

- i. which bodies and persons the local planning authority invited to make representations under Regulation 18 (see Appendix 1);
- ii. how those bodies and persons were invited to make representations under Regulation 18 (see Appendix 2);
- iii. a summary of the main issues raised by the representations made pursuant to Regulation 18 (see Appendix 12);
- iv. how any of those representations made pursuant to Regulation 18 have been taken into account (see Appendix 12); and
- v. if representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations (see Chapters 4 & 5).

The St Helens Borough Local Plan

Future development within St Helens will be guided by the plans and policies within the new Local Plan for St Helens, which runs from 2020 to 2035. The LPSD includes strategic policies guiding the amount, form and location of new development, and strategic and non-strategic allocations for new housing, employment and other forms of development. The LPSD also comprises of local policies with additional requirements, which will guide the consideration of planning applications for new development.

Preparation of the LPSD commenced with a Scoping consultation in 2016 and this was followed by a Preferred Options consultation in 2016/17. The Preferred Options document and consultation responses received at the Preferred Options stage informed the preparation of the LPSD. Chapter 3 sets out a brief description of every stage in the preparation of the Plan, a description of how the consultation was undertaken, and how the responses were taken account of in the next stage of plan preparation. The consultation materials used at the consultation stages and the reports of consultation are attached as appendices.

2. Statement of Community Involvement

The most important document that has guided the approach to consultation throughout the various consultation stages in the preparation of the LPSD is the Council's Statement of Community Involvement (SCI). The requirement to produce a SCI was introduced in the 2004 Planning and Compulsory Purchase Act. The Council's current SCI was adopted on 20 November 2013, and sets out the Council's policy for the involvement of the local community in:

- the preparation of the Local Development Framework; and
- the determination of planning applications.

The SCI provides details of how St Helens Council will communicate with the local community and ultimately how they can get involved in the preparation of planning policy. It identifies the key groups that the Council seeks to consult with; the underlying intention being to engage with anyone who has an interest in the future of the Borough, as a place to live, work or visit. The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe a series of "Specific and General Consultation Bodies" that the Council should consult with during each consultation stage.

The list below outlines the specific organisations and other bodies that the Council consider having an interest in the preparation of planning documents within St Helens:

Specific Consultation Bodies

- The Coal Authority
- Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Highways England
- Network Rail
- Adjoining Local Planning Authorities
- Elected Members of St Helens Council
- Members of Parish Councils (Both St Helens & Neighbouring St Helens)
- Telecommunications / Electronic Communications Operators
- Primary Care Trust(s) / Clinical Commissioning Group
- Utility and Service Providers (including relevant gas, electric, sewerage and water undertakers)
- Homes England
- Local Policing Bodies

The general consultation bodies are also identified in the Regulations and relate to voluntary organisations representing certain groups within the community.

General Consultation Bodies:

- voluntary bodies some or all of whose activities benefit any part of the Council's area;
- and
- bodies which represent the interests of:
 - different ethnic or national groups in the local authority's area;
 - different religious groups in the local authority's area;
 - disabled people in the local authority's area; and

- people carrying out business in the local authority's area.

The Council's SCI also contains a list of general consultation bodies, which covers all identified bodies in the Regulations, with the addition of the following:

- Gypsy & Travellers' Organisations
- Home Builders' Federation
- Local Enterprise Partnership
- Local house builders
- Other Council Departments
- Police and other emergency services
- Planning Agents (including solicitors, planning professionals, estate agents.)
- Social housing providers
- Waste Regulation Bodies
- Waste Companies

The Council maintains a database (register) which includes the Specific and General Consultation Bodies together with local organisations and individuals that have expressed an interest in being consulted on or kept informed of the development of planning policy. We have more than 2000 consultees on our database including local residents, landowners, developers, infrastructure providers, neighbouring local authorities, town/parish councils and various other stakeholders.

This database is live and continuously updated. Registration on the database is available at any time to anyone by contacting the Planning Policy team on 01744 676190, or by emailing planningpolicy@sthelens.gov.uk.

The methods of communication used to notify interested parties are varied to be as inclusive as possible with the SCI making clear that this will be determined taking into account the nature of the document, the geographical area affected, and the stage of the Local Plan preparation process. This could include:

- Stakeholder meetings and presentations;
- Individual letters and emails;
- Local media and press releases, including publication in the community magazine and public notices;
- Website publication and deposit of documents in public buildings;
- Articles in specialist publications;
- Questionnaires or response forms;
- Public meetings and exhibitions.

2.1 Duty to Cooperate

The Duty to Cooperate is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011) and is amplified in Paragraphs 24-27 of the National Planning Policy Framework (NPPF) and in the Planning Practice Guidance (PPG). The Localism Act 2011 places a duty on local planning authorities and other prescribed bodies, to co-operate on strategic planning issues relevant to their areas in the preparation of Local Plans and other planning documents, and to work together on such issues on an ongoing basis.

A separate Duty to Cooperate statement has been submitted alongside the LPSD, and a yearly summary of how the Council continues to fulfil the Duty to Cooperate is contained in the Authority Monitoring Report.

2.2 Statement of Common Ground

The NPPF requires strategic policy-making authorities to prepare, maintain and update one or more Statement(s) of Common Ground in order to demonstrate effective and on-going joint working. NPPF Paragraph 35 sets out the soundness tests against which local plans are assessed at the examination stage, and with respect to Duty to Cooperate, they include: (a) informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated; and (c) based on effective joint working on cross-boundary strategic matters, as evidenced by a statement of common ground.

The Council have submitted two separate Statements of Common Ground alongside the LPSD: the Liverpool City Region Spatial Planning Statement of Common Ground, which has been drafted collaboratively by the Liverpool City Region Combined Authority (LCRCA), the 6 constituent Authorities and West Lancashire (Associate Member of the LCRCA), and a Statement of Common Ground with Warrington Council.

3. Previous Consultations on the St Helens Borough Local Plan

3.1 Initial Preparation

St Helens Council is the Local Planning Authority (LPA) for the Borough, responsible for preparing the Local Plan. In October 2012, the Council adopted a Local Plan Core Strategy for St Helens. This followed several years of preparation, consultation and independent Examination. It was envisaged that the Core Strategy would be supported by three further Local Plan documents:

- Allocations Local Plan – which would allocate land for development;
- Sustainable Development Local Plan – which would set out detailed planning policies; and
- Bold Forest Park Area Action Plan (adopted in 2017).

The Core Strategy set out the strategy for development in the Borough up to 2027, and while it is still a sound and robust Local Plan, some issues have moved on from when the Core Strategy started preparation in 2005. These issues include a significant change in national planning policy, a large increase in the demand for employment land as the economy has started to recover from the 2008-2013 recession, and the success of the Borough in recycling previously developed (“brownfield”) sites means there is less land available for new homes and businesses. The Core Strategy acknowledged that Green Belt land was likely to be needed to meet housing land need, and the Council now considers it is needed to meet employment land needs as well.

The Council decided to consolidate the Core Strategy and the proposed Allocations and Sustainable Development Management Local Plans into one Local Plan document. This will result in the full replacement of the current UDP, UDP Proposals Map and Core Strategy (it will not replace the Bold Forest Park Action Area Plan). A decision was made by the Council’s Cabinet in November 2015 to prepare a new single Local Plan for the Borough of St Helens. The Local Development Scheme (LDS), which must set out the timescale and content of any Local Plan being prepared, was consequently updated.

Whilst the Core Strategy will be replaced by the LPSD, its underlying strategy (which is focused on urban regeneration and the re-use of brownfield land) was one of the options originally tested against other reasonable alternatives in the initial stages of the Local Plan preparation. It was then identified as the preferred option and formed the ‘starting point’ for the progression of the LPSD.

3.2 St Helens Local Plan Scoping – January 2016 to March 2016

Regulation 18 of the 2012 Local Plan Regulations requires the Council to notify certain “bodies or persons” of the subject of the Local Plan the Council proposes to prepare, and also to invite them to make comments (“representations”) to the Council on what a Local Plan of that subject should contain. The Council did this at the St Helens Local Plan Scoping consultation stage (20 Jan 2016 to 2 Mar 2016). The consultation letters (see Appendix 2) and other consultation materials set out how St Helens Council proposed to prepare a new

Local Plan and asked residents, businesses and other stakeholders which issues are important and what the new Local Plan should contain. This included views on planning policies and which sites - including those in urban areas and the Green Belt - should be developed or protected. The consultation asked 21 questions in relation to the Scoping Document, which are set out in Appendix 3.

3.4 Methods of Consultation

The consultation was carried out in line with the Council's adopted 2013 SCI and included:

- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies;
- articles and adverts in the local newspapers;
- posts on Council social media such as twitter and Facebook;
- information pages on the Council website with link from the front page;
- A4 posters distributed across the Borough; and
- offers of meetings made to stakeholders such as specific and general consultees, including St Helens Chamber.

A total of 212 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period (the bodies invited to make representations are set out in Appendix 1). The main issues raised by these were identified and summarised by the Council and published in the report entitled "**St Helens Local Plan 2018 – 2033 Summary of Representations on St Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016**" (see Appendix 6).

The representations were considered by the Council, and where appropriate, informed the preparation of the Local Plan Preferred Options (LPPO) and the LPSP.

3.5 Main Issues raised at Scoping Stage

There were no suggestions for a significant change in scope of the Local Plan, or for any additional key issues to be identified. There were suggestions that climate change and environmental conservation should be made more central to the Plan. Comments on the Vision included a need for growth but balanced with well-being and health, more emphasis on brownfield land regeneration before use of Green Belt, making sure the Council could accommodate growth needs and also regenerate the town centres.

There was concern from the public about the amount of employment land that the evidence indicated would be required, in particular from the Green Belt, and especially at the former Parkside Colliery in Newton-le-Willows, due to potential adverse impacts on the local community. The re-use of brownfield land and growth of higher technology businesses were suggested instead. However, other authorities indicated that they could not meet St Helens employment land needs in their area, and there was support from the development industry for the level of employment land and housing growth identified by the evidence base. Indeed, some stakeholders suggested substantially higher levels of employment and housing growth than the evidence base indicated, and thus some thought the allocations DPD should proceed with Green Belt release.

There was concern about the impact of potential higher levels of development on infrastructure, in particular on the road network.

3.6 How the Main Issues raised at Scoping Stage have been taken into account

How the Council took account of the main issues arising at Scoping, is set out in the report *“St Helens Local Plan 2018 – 2033 Summary of Representations on St Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016”* (see Appendix 6). Comments received in relation to the Sustainability Appraisal (SA) Scoping Report Dec 2015 were also taken into consideration in preparation of the St Helens Local Plan Sustainability Appraisal: Interim SA Report Dec 2016. A further stage of the SA has been prepared for the LPSP.

3.7 St Helens Local Plan 2018-2033 Preferred Options – December 2016 to January 2017

Although, the 2012 Regulations do not require any more than a scoping consultation (Regulation 18) and publication of the Local Plan for representations to be made (Regulation 19) on the proposed submission draft version of the Local Plan prior to submission for examination (Regulation 22). The Council decided to invite comments on the LPPO, which was an advanced draft of the Local Plan, setting out various options that had been considered and what, at the time, were the Council's Preferred Options for key issues. This consultation took place from 5 December 2016 to 30 January 2017.

The LPPO was accompanied by a draft Policies Map and supporting evidence base, including a draft Green Belt Review (2016), employment and housing needs evidence, housing and employment land supply evidence, open space and sport assessments, an interim draft Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), and was informed by other draft documents, including an emerging Economic Viability Assessment (EVA).

The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 18 of the 2012 Local Planning Regulations. This included:

- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies;
- letters sent to properties within 200m of sites proposed to be removed from the Green Belt;
- articles and adverts in the local newspapers, repeated mid-way during the consultation;
- posts on Council social media such as twitter and Facebook;
- information pages on the Council website with link from the front page;
- A4 site notices displayed next to sites being proposed for development;
- A4 posters distributed across the Borough;
- Copies of the LPPO, Policies Map, background evidence-based documents and the accompanying SA's were made available in libraries, at the Council offices and on the Council's website; and

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

- Offers of meetings made to stakeholders such as specific and general consultees, including St Helens Chamber.

Council officers hosted 15 daytime, evening and weekend drop-in sessions at locations across the Borough to provide information on the LPPO and answer questions from the public.

Table 1: Public Engagement Sessions at Preferred Options Stage

Location of Drop-in Event	Date	Time
Eccleston Library, Eccleston	Wednesday 7 th December 2016	2pm – 6.30pm
Garswood Library	Thursday 8 th December 2016	2pm – 6.30pm
Haydock Library, Haydock	Friday 9 th December 2016	2pm – 6.30pm
Central Library, St. Helens Town Centre	Saturday 10 th December 2016	11am – 3.30pm
Rainford Village Hall, Rainford	Monday 12 th December 2016	2pm – 6.30pm
Chester Lane Library, Sutton Manor	Tuesday 13 th December 2016	2pm – 6.30pm
Newton Library, Newton Le Willows	Thursday 15 th December 2016	2pm – 6.30pm
Rainhill Library, Rainhill	Monday 19 th December 2016	2pm – 6.30pm
Thatto Heath Library, Thatto Heath	Tuesday 20 th December 2016	2pm – 6.30pm
St Helens Town Hall, St Helens Town Centre	Wednesday 21 st December 2016	10am – 5.30pm
Billinge Library, Bilinge	Wednesday 11 th January 2017	2pm – 6.30pm
St Helens Town Hall, St Helens Town Centre	Thursday 12 th January 2017	10am – 5.30pm
Central Library, St. Helens Town Centre	Saturday 14 th January 2017	11am – 3.30pm
St. Julie's Church Hall, Howards Lane	Monday 16 th January 2017	6pm – 8.30pm
Bleak Hill Primary School, Windle	Thursday 19 th January 2017	5pm – 8pm

The events were well attended. In addition, Council officers gave presentations to the St Helens Senior Voice Forum and St Helens Youth Forum to discuss the Local Plan and obtain feedback from the perspective of those groups.

A total of 5,695 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period (the bodies invited to make representations are set out in Appendix 1, and relevant documentation associated with this stage are set out in Appendices 6, 7, 8 & 9). The main issues raised by these were identified and summarised by the Council and published in the

report entitled “***St Helens Borough Local Plan 2020-2035: Local Plan Preferred Options Report of Consultation December 2018***” (see Appendix 12).

The representations were considered appropriately by the Council and have been addressed in the LPSD.

3.8 Main Issues Raised at Preferred Options Stage

The majority of members of the public who responded did not support the scale of Green Belt release proposed in the LPPO. There were doubts expressed over whether the amount was justified, and the level of need for housing and employment land was also questioned, indicating that St Helens has had a declining population up until fairly recently.

Many people were concerned about the potential adverse impacts of the new development on biodiversity and wildlife, landscape and historic character. The loss of agricultural land needed for food production was also a concern cited by some. Others asked why more brownfield land was not being allocated, or empty homes occupied, rather than Green Belt land being developed.

Respondents also mentioned increased traffic congestion and air pollution which could arise from new development, and there were concerns raised about the ability of the Borough’s highway infrastructure to cope, especially at congested junctions with any new or further development. There was concern about the need to avoid exacerbating flooding problems in parts of the Borough. Concerns were raised by many respondents about a perceived lack of infrastructure to support existing population, especially education and health, let alone the additional development and population.

There was support for providing more affordable housing and housing for elderly persons, including bungalows and retirement housing. As stated above, the main issues raised at this stage were identified and summarised by the Council and published in the report entitled “***St Helens Borough Local Plan 2020-2035: Local Plan Preferred Options Report of Consultation December 2018***” (see Appendix 12).

3.9 How the Main Issues raised at Preferred Options Stage have been taken into account

In preparing the LPSD, officers refined a range of options which were set out in the Preferred Options document 2016. When preparing the strategy in the LPSD, Council officers carefully weighed the issues raised at the LPPO consultation stage, alongside updated evidence (including a revised Green Belt Review) and the changing requirements of Government policy. The strategy sought to strike the right balance between meeting housing and employment development needs, while protecting the most valuable environmental resources and the overall function of the Green Belt and making provision for adequate infrastructure to be secured at the appropriate time. Compared to the version consulted upon at Preferred Options the Vision, Aims and Objectives were all revised to stress the need for a balanced and inclusive approach to regeneration and growth. It also placed further emphasis on protecting and enhancing the built heritage and environment of the Borough. Other main changes to the Plan included:

- the annual minimum housing requirement was reduced from 570 to 486 dwellings per annum;
- the employment site to the north east of the M6 junction 23 was moved back from being an allocated site (for development before 2035) to be safeguarded for potential development after 2035;
- there was a clearer focus on specific growth locations (e.g. the Bold urban extension);
- the assumed density of development on some housing sites was increased;
- the overall amount of Green Belt to be lost was substantially reduced, including the number of proposed sites for development;
- some housing sites were moved from being allocated for development before 2035 to being safeguarded for potential development after 2035; and
- Plan proposals were refined to take account of updated evidence of infrastructure issues.

An Infrastructure Delivery Plan (IDP) was developed to address infrastructure requirements that are clearly set out in policy to support delivery of the Plan. The impact of housing and employment development on the road network, both roads controlled by St Helens Council and those by Highways England (i.e., the M6 and M62) was evidenced through the development of a transport model, and the degree of impact and potential mitigation were considered through a Transport Impact Assessment.

In November 2017, the Council wrote to all respondents who submitted comments and provided a valid email address or complete postal address at the LPPO stage, to give an update on the Local Plan's progress since the consultation and to inform them of the revised timetable.

3.10 Call for Sites

Call for Sites (CfS) exercises have also formed an important part of the Plan preparation process. The identification of land for subsequent allocation in the Plan has been informed by several CfS exercises. The aim of a CfS is to allow interested parties to suggest land or premises that could be suitable for development or allocation in the Local Plan.

In 2013, suggestions for other uses such as employment, retail, leisure and other significant development, including sites in the Green Belt, and suggestions for sites that should be protected from development, were accepted as part of the process to prepare the Allocations and Sustainable Development Local Plan.

Between 20th January and 2nd March 2016, the Council invited the submission of sites to be considered for housing in the Strategic Housing Land Availability Assessment 2017, (SHLAA) as well as for allocation in the new Local Plan for a wide range of uses, such as:

- jobs and employment;
- housing;
- community facilities;
- leisure and sports use;
- minerals and waste;
- Gypsy, Traveller and Travelling Showpeople; and
- retail.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Developers and landowners were contacted via letter or email, and both periods of public consultation were publicised on the Council's website, see Appendix 10 for the Call for Sites form.

Where owners expressed an interest in their site(s) being developed, and the site fell outside the Green Belt, the Council assessed their suitability for development. For potential housing sites, this has been done through the Council's regularly updated SHLAA documents. For potential employment sites this has been done through the Council's monitoring of employment land supply. All Green Belt sites have been assessed in the St Helens Green Belt Review 2018 (GBR (2018)) (Ref: SD020).

The Council will continue to accept the submission of new sites, and information on these sites will be retained for inclusion within future SHLAA and Local Plan work.

4. The St Helens Borough Local Plan Submission Draft (Reg 19)

4.1 Introduction

The Council published the 'Submission Draft' version of the St Helens Borough Local Plan: 2020-2035 (LPSD) with its supporting documents in January 2019. The Plan was accompanied by a Policies Map and a suite of supporting evidence base documents, which included:

- The Sustainability Appraisal, 2019 – Main Report;
- The Sustainability Appraisal, 2019 – Non-Technical Report;
- The Sustainability Appraisal, 2019 – Appendix 5: Scoping Report;
- The Sustainability Appraisal, 2019 – Technical Appendix A;
- The Habitats Regulations Assessment, December 2019;
- The Report of Consultation, 2018;
- The Green Belt Review, 2018;
- The Infrastructure Delivery Plan, December 2018;
- The Economic Viability Assessment, December 2018;
- The Strategic Housing Market Assessment, December 2018;
- The Employment Land Needs Assessment (Addendum Report), January 2019;
- The 2017 Retail and Leisure Study;
- Transport Impact Assessment, 2019 (Main Report & Appendix A);
- Transport Impact Assessment: Local Model Validation Report 2018;
- Transport Impact Assessment: Forecasting Report 2018; and
- Sustainable Transport Impact Assessment Report, 2019: Appendix A - D.

An initial period of public consultation was undertaken from 17th January until 13th March 2019. A similar and consistent approach regarding the organisation and delivery of the public consultation was taken during this stage of the Local Plan to the previous LPPO 2016 stage. However, at this stage the Council asked respondents to submit their representation on a specific form which required them to state whether they thought the Plan complied with Duty to Cooperate, was legally compliant and sound, and to indicate whether they wished to appear at the examination. The comments form (Appendix 13) also gave respondents the opportunity to comment on any of the other submission documents, including the SA, HRA, EVA, IDP and GBR (2018).

Unfortunately, during the consultation process it came to the Council's attention that the Council did not, as intended, mail out a letter to all residents living within 200m of proposed LPSD sites 4HA and 5HA in Bold. Although there was no legal requirement for the Council to do so, the Council took the immediate and positive step of writing to all those within a 200m distance of proposed sites 4HA and 5HA and extending the consultation deadline until the 13th May 2019, giving these residents (and the rest of the Borough) a further eight week period to make a representation. Many previous representors took advantage of this extended time period and submitted further responses. An additional drop-in event in Bold was also organised for residents to come and speak to officers and discuss the Plan.

4.2 Consultation

The supporting documents and LPSP were put on public deposit at all Council libraries, Planning Reception in the Town Hall and uploaded onto the Council's website.

The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 19 of the 2012 Local Planning Regulations. This included:

- email or written notifications sent to all those on the Council's consultee database (which included all those who submitted a response at LPPO stage) and to specific and general consultation bodies;
- letters sent to properties within 200m of sites proposed to be allocated or safeguarded for future development (this included Green Belt, Brownfield and Gypsy, Traveller and Travelling Showpeople sites);
- letters sent to all properties within 50m of an anomaly Green Belt change;
- letters, posters and leaflets were used to advertise the eleven drop-in events across the Borough, which were for members of the public to view the Plan, maps and discuss matters with officers;
- articles and adverts in the local newspapers (repeated mid-way during the consultation);
- posts on Council social media such as twitter and Facebook;
- information pages on the Council website with link from the front page;
- A4 site notices displayed next to sites being proposed for development;
- A4 posters distributed across the Borough, including Parish noticeboards, Local Authority facilities and various retail outlets; and
- offers of presentations made to stakeholders such as specific and general consultees, including St Helens Chamber.

Written Notification

Letters were sent to residents within 200m of a proposed allocated or safeguarded site, those within 50m of a Green Belt anomaly change and to those individuals included on the Local Plan consultation database. This approach was taken to ensure that those that would be directly affected by the proposed sites and those individuals that had previously requested to be notified of future updates to the Local Plan were informed and invited to make representations.

Press Releases

Articles were published in a local newspaper, the 'St Helens Star' throughout the duration of the consultation period to keep residents informed of the public consultation. Press releases were also communicated via the Council's social media platforms including Twitter and Facebook (see Appendix 17 for examples of articles and adverts in the local newspapers).

Online Promotion

Throughout the consultation period a permanent advert was included on the homepage of the Council's website. A dedicated webpage on the St Helens Council website was created to include all information relating to the LPSP including consultation material and supporting evidence-based documents. Additionally, the Local Plan webpage included a direct link to the online representation form allowing those who wished to submit their representation online.

Site Notices

Site notices were placed at various points surrounding all proposed allocated and safeguarded sites for development, as this provided the Council with another means of communicating with residents (examples contained in Appendix 16).

Posters, Leaflets and Banners

Poster and leaflets were produced to advertise the public consultation period and were distributed at various locations across the Borough. They were displayed on town and parish hall noticeboards, as well as in local shops, libraries, leisure facilities and medical centres (examples contained in Appendix 15).

Public Engagement Sessions

Council officers hosted 11 daytime and evening public engagement events (drop-in events) at various locations across the Borough (see table below), to provide information on the LPSD and answer questions from the public. The drop-in events were spread across the Borough in order to allow all of the Borough's population an opportunity to attend a localised event. Subsequently, events were tailored towards specific proposed areas of developments however, not exclusively and queries regarding the Local Plan as a whole were welcomed and answered by council officers. The events were publicised via a variety of mediums including digital and written advertisements, posters, pull-up banners, and leaflets.

Table 2: Public Engagement Sessions at Publication Stage

Location of Drop-in Event	Date	Time
St Helens Town Hall, St Helens Town Centre	Tuesday 22 nd January 2019	12pm – 5pm
St Ann's Millennium Centre, Rainhill	Tuesday 29 th January 2019	2pm – 6.30pm
St John Vianney School, Thatto Heath	Tuesday 12 th February 2019	2pm – 6.30pm
Newton Library, Newton Le Willows	Thursday 14 th February 2019	2pm – 6.30pm
St Julie's Church Hall, Eccleston	Monday 18 th February 2019	2pm – 6.30pm
Billinge Road Community Hall, Garswood	Wednesday 20 th February 2019	2pm – 6.30pm
Haydock Library, Haydock	Monday 25 th February 2019	2pm – 6.30pm
Chester Lane Library, Sutton Manor	Tuesday 26 th February 2019	2pm – 6.30pm
Rainford Village Hall, Rainford	Thursday 28 th February 2019	2pm – 6.30pm
St Thomas of Canterbury School, Windle	Monday 4 th March 2019	5pm – 7pm
Clock Face Miners Recreation Club, Bold	Tuesday 9 th April 2019	4.30pm – 8.30pm

At the events, large scale maps with supporting text were placed on display boards. Each display board focussed upon a specific topic for example; brownfield sites, Green Belt and infrastructure etc. and how such had influenced the development of the LPSD. Consultation documents including a copy of the LPSD - Written Statement, Policies Map, Green Belt Review (2018), IDP, LPPO Report of Consultation (2018), SA etc. were available to view for those who attended the events. Additionally, those who attended the events were able to collect a range of literature including a briefing note, frequently asked questions and hard copies of representations forms with accompanying guidance notes.

In addition, the Council sought to work with Parish Councils throughout the Plan's preparation process. In light of the important role of the Parish Councils all parish councillors (both within the Borough and in adjoining authorities), were invited to a meeting intended to give an overview of the LPSD, which took place at the Town Hall on Monday 4th February 2019, this was well attended by both St Helens Borough parish councillors, and parish councillors from Cronton and Penketh (outside the Borough). Prior to this on the 29th January 2019 all Parish Clerks (within the Borough) were provided with hard copies of the LPSD, its supporting documents and posters.

A total of 12,745 emails and letters were sent out to all those on the Council's consultee database (which included all those who submitted a response at LPPO stage) and to specific and general consultation bodies.

4.3 Responses

In total, the Council received 2,364 responses, however a number of these responses were duplicates (see Table 3 for a full breakdown). When duplicates and anomalies were taken account of a final total of 1,989 unique responses, from individuals, organisations, local groups, and businesses were received during the course of the consultation period. This was a substantially lower number than the LPPO consultation (5,695).

A large number of responses were submitted on dedicated pre-prepared response forms/emails produced by residents' action groups for specific sites, namely 1HA, 1HS, 2HA, 2EA, 3HS, 5EA, 6EA, 8HA and 8HS.

Some 496 part 'A' forms only were submitted with no part 'B' completed, some suggested they wanted to be acknowledged as part of the Bold and Clock Face Village Action Group and some simply entered their personal details. Therefore, as no specific details have been raised on the LPSD these forms have not been attributed to any specific part of the LPSD. However, the Bold and Clock Face Village Action Group as part of their submission (Ref: RO0872) advised the Council that their representation was supported by 427 signed part 'A' forms in support and agreement of their representation. It would be reasonable therefore to assume that a large majority of these forms are supportive of this action group and unsupportive of LPSD sites 4HA and 5HA.

Despite the Council requesting a set prescribed form had to be completed at this stage, the Council still received, and accepted 364 paper letters, emails and petitions. Two representations were late, they were submitted on the day the consultation closed (13th May 2019) but not within the specified timeframes. However, on balance the Council considered it would be unreasonable not to accept both representations given that they were received shortly after the consultation deadline. However, some 71 representations were received by residents in Lowton in August and September 2019, given the timescales involved the Council have not accepted these representations as they were clearly not duly made.

In many cases, respondents have made representations on more than one policy or section of the Plan or supporting documents. The Council have therefore (where appropriate), sought to separate out individual responses into multiple representations in order to make it clear what part of the Plan or supporting documents the response is referring to. The Council have broken down the 1,989 individual responses into 4,050 representations.

Appendix 18 provides an index of representor names and associated representor reference numbers.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

In respect to submitted petitions only the lead petitioner's details (the individual that submitted the representation) have been used, so details of those that signed a petition are not set out in Appendix 18. This approach will also be carried forward in the Plan Order¹ report (Ref: SD007.1 – SD007.34) in order to ensure the document is more accessible, focussed and of a practical and reasonable size.

Respondents were able to submit responses by the following means:

- Electronically via e-mail direct to the planning policy team at St Helens Council;
- Via the Council's webpage specifically set up for this consultation; and
- By post (or hand) to the Planning Policy team or Planning Reception.

The individual respondents chosen method of submitting their representations can be broken down as follows:

Table 3: Respondents Chosen Method of Submission

Type of Representation	Number Received
Web Form submission	479 (491 initially, however, 8 were anomalies & 4 were duplicates)
Email Form submission	82 (96 initially, however, 7 were anomalies & 7 were duplicates)
Email Letter submission	279 (330 initially, however, 8 were anomalies, 20 were duplicates & 23 did not provide sufficient data so were discounted)
Postal Form submission	1,323 (1,355 initially, however, 3 were withdrawn, 17 were anomalies & 12 were duplicates)
Postal Letter submission	51 (58 initially, however, 2 were anomalies, 4 were duplicates & 1 did not provide sufficient data so were discounted)
Petitions submission	34 with a combined total of 843 signatories

The number above does not correspond with the end total number of individual representors (**1,989**), as some respondents chose multiple methods of submitting a response, cumulating in a number of duplicate responses.

A total of 116 representors indicated that they wished to appear at the examination.

A table showing the numerical distribution according to the part of the LPSD commented upon (including comments on soundness, objection, support or neither) has been produced as Appendix 20 to this report.

The Council has also published a copy of each representation made. These should be referred to, to appreciate the full comment made in each case, and can be viewed in submission documents Ref: SD007.1 – SD007.34 and SD008.1 – SD008.26.

¹ The Plan Order documents comprise of the extracted parts of a representation relevant to that particular part of the Plan it is referring too only, and not necessarily the full representation. The full representation can be viewed in the Representor Order document.

4.4 Guide for Local Plan Examinations Update June 2019

In June 2019, the Planning Inspectorate updated their Procedural Guide for Local Plan Examinations². The new guide states:

“To ensure an effective and fair examination, it is also important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA should therefore ensure that they are able, lawfully, to process personal data held in relation to representations on the plan so that the representations can be made available without redaction of names and addresses and taken into account by the examining Inspector. If names and addresses are not provided it is very unlikely that it will be possible for the plan to be examined.”³

Following this, in September 2019 the Council wrote to all those who had made a representation to advise them of this new guidance and to give them the opportunity to let the Council know if they did not want their name or postal address to be made publicly available. A total of 110 individuals (Table 4) wrote to the Council and requested their name and address be redacted. 11 of these individuals wished to have their name and address redacted due to being employed in sensitive professions. A further 2 respondents requested that their representation be withdrawn completely as they had no knowledge of making such a representation.

In addition, 48 individuals who had not provided a full name and address as part of their representation were contacted and asked to provide further information. Of those 48 only 15 individuals provided their full details, therefore the remaining 33 individuals (under PINS Guidance) are considered to have submitted invalid representations as they did not provide sufficient personal details as required by the Planning Inspectorate (Table 5). These representations have still been taken into consideration by the Council and will still be submitted to the Planning Inspectorate in the following submission documents SD007.35 & SD008.27. However, it will be for the Planning Inspector to consider how much weight is given to these submissions, as with those that requested their details to be redacted.

The following representor numbers are those whose details have been redacted. Although redacted, the Council have included reference to their comments within this report, as at the time of submission the representations are considered duly made.

Table 4: List of representors whose personal details have been redacted (110)

RO0085, RO0154, RO0329, RO0332, RO0650, RO1087, RO1088, RO1104, RO1106, RO1934, RO1935, RO0018, RO0028, RO0056, RO0059, RO0121, RO0131, RO0168, RO0176, RO0195, RO0196, RO0197, RO0215, RO0262, RO0263, RO0295, RO1084, RO0346, RO0347, RO0419, RO0425, RO0426, RO0427, RO0451, RO0462, RO0474, RO0498, RO0499, RO0547, RO0551, RO0609, RO0610, RO0638, RO0639, RO0662, RO0663, RO0664, RO0677, RO0680, RO0681, RO0733, RO0745, RO0795, RO0798, RO0800, RO0810, RO0871, RO0877, RO0907, RO0931, RO0933, RO0942, RO0978, RO0979, RO0980, RO0987, RO1055, RO1056, RO1076, RO1129, RO1134, RO1192, RO1198, RO1254, RO1260, RO1289, RO1290, RO1316, RO1376, RO1378, RO1398,

² The new guidance can be viewed via <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

³ See Appendix 19 for a joint statement published in October 2019 by St. Helens Council and the Planning Inspectorate on this matter.

RO1399, RO1401, RO1410, RO1444, RO1451, RO1452, RO1475, RO1511, RO1564, RO1597, RO1598, RO1604, RO0824, RO1625, RO1648, RO1670, RO1672, RO1706, RO1710, RO1739, RO1766, RO1767, RO1814, RO1815, RO1850, RO1892, RO1896, RO1900, RO1907

All representations including those listed in tables 4 & 5, will be submitted to the Planning Inspectorate (Representor Order documents SD008.1 to SD008.27 and Plan Order documents SD007.1 to SD007.35), together with the Plan and submission documents for independent examination. However, the Council have made all those involved aware that where representations have had names and addresses redacted or have not provided sufficient details, that the Inspector may ultimately decide to disregard or give less weight to such representations.

Table 5: List of representors who have not provided full name or address details (33)

RO0095, RO0276, RO0475, RO0605, RO0706, RO0780, RO1124, RO1496, RO1924, RO1969, RO1970, RO1971, RO1972, RO1973, RO1974, RO1975, RO1976, RO1977, RO1978, RO1979, RO1980, RO1981, RO1982, RO1983, RO1984, RO1985, RO1986, RO1987, RO1988, RO1989, RO1990, RO1990, RO1991

4.5 Conclusions inevitable

For each stage of the Local Plan preparation process, this Statement outlines the consultation process, which bodies and persons were invited to make representations, how these bodies and persons were invited to make representations, a summary of the main issues raised by those representations, and how these main issues have been taken into account in the LPSD.

It is clear from this Statement that opportunities have been taken by local residents, businesses, statutory consultees, interested bodies and organisations to examine and comment on the new Local Plan. The Council's approach to consultation was therefore effective in engaging with all stakeholders and was conducted in accordance with its SCI. Appendix 23 shows the continued engagement and correspondence with both Natural England and Highways England post LPSD stage.

With regard to legal conformity, the Statement demonstrates compliance with the Town and County Planning Regulations. In particular this Statement demonstrates that at each consultation stage, the appropriate documents have been available for public inspection and the appropriate advertisements and notifications have been undertaken.

5. Key and Main Issues (by Chapter, Policy and Site) including Council Response and Amendments

5.1 Introduction

This chapter picks out what the Council considers to be the key issues and summarises the main issues raised by respondents in relation to each chapter, policy and sites identified within the LPSD. It also provides a Council response on these issues and references any subsequent minor modification the Council considers necessary to the LPSD. The information is presented as a series of tables that cover the LPSD in Plan order (i.e., vision, policies, and sites). Some of the main issues have been submitted by multiple representors⁴ and/or by persons whose names have not been attributed within the summaries.

The Council have provided a response to both the key issues and main issues identified and where applicable have included a suggested modification. The main list of modifications, (which are predominantly minor editorial and factual amendments) are contained in the submitted Schedule of Changes document (Ref: SD003).

5.2 Summarising Representations

Representations were reviewed and broken down into Plan order by a number of officers. Following this process, main and key issues were drawn out and added to the tables below. As part of this work individual responses may have been re-allocated to different sections of the Plan other than what the representor had initially stated, if for example it is clear that the representor has mixed up a site or policy reference.

Due to the sheer volume of representations received, in order to simplify and keep the size of this document to a readable size, the same objections/issues raised by multiple representors have, where appropriate, been summarised just once in the tables below. Similarly, if an objection has been made to a specific policy and proposed development site, the objection has only been included once. The same approach has been made regarding general comments made against a site, for example, if a representor has objected to a proposed housing allocation on air quality grounds, we have tried to only reference this once under the general comments section.

As per the LPPO consultation, the Council received a substantial number of objections to the proposed release of Green Belt land, with doubts expressed over whether the amount of land to be released was justified. Representors referred to a declining population, and the amount of existing brownfield land that could be utilised as reasons why Green Belt land release is not justified; together with the Council's use of the 2014 ONS population figures, rather than the latest 2016 ONS population figures, on the basis that the 2016 figures could provide a much lower housing requirement.

Many people were concerned about the potential adverse impacts of new development on biodiversity and wildlife, and landscape character. The loss of high-grade agricultural land needed for food production was also a concern for many representors.

Representors also mentioned increased traffic congestion and air pollution that could arise from proposed development, and concerns were raised again about the ability of the Borough's highway infrastructure to cope, especially at congested junctions with new development. Many suggested that the Plan encouraged car dependency due to the location

⁴ Members of the public who put their name to a petition (i.e. a representation with 5 or more signatories) are not identified individually.

of allocated sites. Concerns were also raised by many respondents about a perceived lack of infrastructure to support existing population, especially education and health, let alone the additional development and population.

As per the LPPO stage there was support for providing more affordable housing and housing for elderly persons, including bungalows and retirement housing.

Local residents close to safeguarded sites also questioned the need and amount of land that had been safeguarded for future development given it would be for a different Plan period and need for that period was still unknown.

5.3 Summary Statement of Key Issues

The following is intended as a summary of the key issues raised. In order to avoid repetition and limit the size of the document, where a developer or resident has made the same point on more than one occasion it has been captured just once and assigned either as a general comment/point or to a specific policy. Similarly, where residents have made the same points for a number of sites, these have where possible, been amalgamated to avoid repetition.

KEY ISSUES	POLICY REFERENCE	KEY ISSUES	COUNCIL RESPONSE / AMENDMENT
1.	General	Whether the Duty to Cooperate is fulfilled, given the lack of Statement of Common Ground with any neighbouring authorities or statutory consultees.	<p>A Duty to Cooperate Statement has been submitted alongside the LPSD (Ref: SD009). This Statement outlines how the Council has fulfilled the Duty to Cooperate.</p> <p>The Council have also submitted two separate Statements of Common Ground alongside the LPSD: the Liverpool City Region Spatial Planning Statement of Common Ground (Ref: SD010), which has been drafted collaboratively by the LCRCA, the 6 constituent Authorities and West Lancashire (Associate Member of the LCRCA), and a Statement of Common Ground has been produced with Warrington Council (Ref: SD012).</p>
2.	LPA05	Whether the housing requirement is too high , given that Green Belt land is proposed to be released to meet these requirements.	<p>In accordance with the NPPF in order for the Local Plan to be sound, the Plan must provide a strategy which, as a minimum seeks to meet the Borough's objectively assessed need.</p> <p>The NPPF expects local authorities to follow the standard method when assessing objectively assessed housing need. The proposed housing requirement of 486 dpa is slightly higher than the exact housing requirement calculated via the standard method (this would have been 468 dpa when the Plan was published in January 2019), as the Local Plan seeks to align planned economic / jobs growth in the Borough with the appropriate provision of housing.</p> <p>As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs. Exceptional circumstances therefore exist to release land from the Green Belt. The Council consider this is a robust approach and is consistent with national policy. The housing requirement seeks to strike an appropriate balance</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

			between planning to meet the economic and social needs of the Borough, whilst preserving the Green Belt.
3.	LPA05	Whether the housing requirement is too low given the Council's proposed quantum of employment land allocations.	The NPPF expects local authorities to follow the standard method when assessing local housing need. The Local Plan housing requirement of 486 dpa is exceeding the need established using the standard method. The Local Plan seeks to align economic / jobs growth in the Borough with the appropriate provision of housing. The proposed housing requirement is an economic led figure which exceeds the standard method, and as such, in accordance with the PPG, should be assumed to be sound.
4.	LPA05	Whether the housing requirement has been evaluated correctly given that the number is based on the 2014 population figures , and not the latest 2016 ONS population figures, which would require a much lower housing requirement than 486 dpa.	<p>Following the publication of the 2016-based household projections, all Local Planning Authorities' were advised by central Government to use the 2014-based household projections when calculating their housing need. This is in order to ensure that the country aims to deliver 300,000 new homes per year.</p> <p>The latest Subnational Population Projections were released in March 2020 and show a slight increase in the predicted overall population growth in St Helens by 2035 (the end of the Plan period) compared to the population forecasts that informed the 2014 household projections upon which the local housing need method is based on. However, given that the Local Plan housing requirement exceeds the current local housing need figure (434 per annum) and is an economic-led figure it is considered it will have enough flexibility to allow for any further changes to the standard method.</p>
5.	LPA06	Whether it is acceptable to remove land from the Green Belt for safeguarding development for beyond the Plan period.	When reviewing the Green Belt boundary, national planning policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. The Council have therefore taken positive steps and identified safeguarded land in order to ensure that longer-term development needs can be met stretching well beyond the plan period, as required by the NPPF.
6.	LPA04	Whether the employment land requirement is too high , given that Green Belt land is proposed to be released to meet these requirements.	In accordance with the NPPF in order for the Local Plan to be sound, the Plan must provide a strategy which, as a minimum seeks to meet the Borough's objectively assessed needs.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

			<p>The LPSD seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG.</p> <p>As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed employment land needs. Exceptional circumstances therefore exist to release land from the Green Belt, The Council consider this is a robust approach and is consistent with national policy. The employment land requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, with preserving the Green Belt.</p>
7.	LPA04	Whether the employment land requirement is too low , given the Council's economic growth aspirations.	<p>The LPSD seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG.</p> <p>The economic aspirations of the LPSD are significantly higher than baseline growth as identified in the Employment Land Needs Study. It is therefore ambitious in our opinion.</p>
8.	LPC01	Whether the policies on density, mix, affordable housing, design and masterplanning are appropriate and avoid adverse impacts on the viability of the Plan.	The requirements set in the LPSD are considered justified by evidence and are consistent with national policy. The policies include sufficient flexibility to avoid adverse impacts on viability and are therefore considered robust and consistent with national policy.
9.	General & LPA08	Whether the necessary infrastructure can be delivered along with the Plan, including education and health facilities.	The IDP has provided an assessment of what infrastructure is required to support the proposed growth in the Plan and Policy LPA08 seeks to ensure that new development is supported by the appropriate development. The Development Plans team will continue to work with the Education department at St Helens Council to ensure there are a sufficient number of school places within the Borough to accommodate the projected needs. Similarly, the same consultation will continue with the St Helens Clinical Commissioning Group to help address and facilitate the impact of new development on existing health facilities over the plan period.
10.	General	Whether or not the Council adhered to the correct consultation regulations as some residents living	Unfortunately, during the consultation process it came to the Council's attention that the Council did not, as intended, mail out a letter to all residents living within 200m of LPSD sites 4HA and 5HA in Bold. Although there was no legal

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		within 200m of LPSD sites 4HA and 5HA in Bold were not initially notified of the LPSD consultation.	requirement for the Council to do so, the Council took the immediate and positive step of writing to all those within a 200m distance of sites 4HA and 5HA and extended the consultation deadline until the 13th May 2019, giving these residents (and the rest of the Borough) a further eight week period to make a representation. In addition, a further drop-in event was also organised to enable local residents to view documents and maps regarding the LPSD and discuss these with officers.
11.	General	Whether it is acceptable to plan for such a number of new homes, given a large number of representors have commented that the population of the Borough has been in decline since 1981.	Although not at the same rate as England and Wales, the population of St Helens has been at a steady increase; and has increased by 2.83% over the last 10 years. (<i>Source: Office for National Statistics Mid-year population estimates 2008 - 2018</i>) Objectively Assessed Need projections show that this steady increase is set to continue until 2043.
12.	LPA07	Whether development will lead to an increased level of traffic that existing roads cannot accommodate, and congestion will be intolerable.	The IDP has provided an assessment of what infrastructure is required to support the proposed growth in the Plan. The transport section was also informed by the findings of a Transport Impact Assessment (2019) ⁵ . Policy LPA08 seeks to ensure that new development is supported by the appropriate development. Policies LPA07 and LPA08 address the potential issue of traffic from new development. Policy LPA07 states that “ <i>all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement</i> ”.
13.	LPD09	Whether additional development proposed will lead to more cars on the road, which in turn will lead to more air and noise pollution .	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
14.	LPA02	Brownfield land should be built on first without the need for the release of any Green Belt land.	Paragraph 3 of Policy LPA02 reaffirms that development on previously developed land in Key Settlements will still remain a priority for the Council. The LPSD continues the Council’s long-standing commitment to promoting urban

⁵ The Transport Impact Assessment (2019) can be found along with other supporting documents here: <https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

			<p>regeneration and the re-development of brownfield sites in the Borough's urban areas.</p> <p>The LPSD identifies that, of the expected housing need of 7,245 dwellings between from 1 April 2020 to 31 March 2035, 5,550 (i.e. 76%) would be delivered on sites identified in the SHLAA. The sites identified in the SHLAA are in urban (i.e. non-Green Belt) locations and are mostly brownfield. However, in order to completely accommodate the Borough's development needs in accordance with the NPPF (paragraph 11. a)) some Green Belt land will have to be released to accomplish this.</p>
15.	General	There are a significant number of vacant homes within the Borough which should be brought back into use before Green Belt land is released.	<p>Council tax data confirms that in October 2017 (the latest date for which these statistics are available), 2,853 dwellings in St Helens were vacant. Out of the total vacancy figure of 2,853 dwellings, only 936 comprised 'Long Term Vacancies' of over 6 months. Other dwellings fall within other categories such as short-term vacancies of less than 6 months and second homes. Therefore, it is the 'Long Term Vacancies' which have by far the greatest potential to be brought back into use to in effect create a 'net addition' to the stock of housing. In this context, the Council has, through its Empty Homes Strategy, pro-actively and successfully enabled over 800 vacant dwellings to be brought back into use since 2003.</p>

5.4 Main Issues Table

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
ST HELENS BOROUGH LOCAL PLAN – SUBMISSION DRAFT			
General Comments / Issues	RO0005, RO0024, RO0025, RO0039, RO0044, RO0045, RO0046, RO0061, RO0063, RO0064, RO0069, RO0070,	Supports the economic ambition of the Plan and its commitment towards the creation of sustainable locations by allocating employment development to meet the needs of the current and future generations of the Borough as well as strengthening its position in the Liverpool City Region (LCR).	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0079, RO0080, RO0087, RO0095, RO0097, RO0099, RO0110, RO0112, RO0115, RO0116, RO0117, RO0119, RO0123, RO0136, RO0142, RO0143, RO0144, RO0152, RO0155, RO0161, RO0166, RO0172, RO0173, RO0192, RO0193, RO0198, RO0208, RO0214, RO0216, RO0233, RO0234, RO0236, RO0237, RO0243, RO0243, RO0249, RO0264, RO0287, RO0288, RO0289, RO0292, RO0301, RO0306, RO0309, RO0320, RO0322, RO0323, RO0329, RO0330, RO0331, RO0338, RO0339, RO0343, RO0344, RO0346, RO0347, RO0350, RO0356, RO0360, RO0361, RO0363, RO0364, RO0372, RO0373, RO0375, RO0378, RO0379, RO0384, RO0385, RO0386, RO0387, RO0395, RO0398, RO0400, RO0409, RO0410, RO0411, RO0412,	<p>Warrington Council confirm that St Helens Council together with Halton have worked closely around housing need and supply issues as part of our respective 'Duty to Cooperate' obligations.</p> <p>The LPSD period covers 2020-2035, however much of the evidence which underpins the LPSD covers different Plan periods, leading to the opportunity for misunderstanding and misinterpretation.</p> <p>Paragraph 22 of the NPPF2019 states that strategic policies should look ahead over a minimum 15-year period from adoption. It is unlikely that the Plan will be submitted, examined and adopted by the end of 2019. Accordingly, the Plan period may need to be reconsidered so that it covers an appropriate time horizon. This may require additional housing and employment land to be identified to ensure these needs are met in full over the Plan period.</p> <p>It is considered that exceptional circumstances exist to release land from the Green Belt (Green Belt), as required by the NPPF. The existing housing land supply of 6,344 homes is significantly short of the emerging Plan's housing requirement of 9,234 net additional dwellings.</p> <p>The Council have failed in their Duty to Cooperate with other Councils, as a Statement of Common Ground has not been published, and as such no effective joint working on cross boundary strategic matters has been evidenced.</p> <p>Many residents commented on sites proposed for development in their area would increase traffic, which will have a significant impact on air-quality, noise, tranquillity and general health. Furthermore,</p>	<p>Comments welcomed.</p> <p>Comments noted. It is not reasonable to expect all evidence base documents to cover the same periods, given that some studies take longer than others, and some assessments lead onto others.</p> <p>The Council anticipate the Plan to be adopted in 2020, hence the Plan period runs from 2020 to 2035, which is clearly a 15-year period. Therefore, the Council considers the Plan period to be acceptable and in line with national policy.</p> <p>Comments noted.</p> <p>A Duty to Cooperate Statement has been submitted alongside the LPSD (Ref: SD009). This Statement outlines how the Council has fulfilled the Duty to Cooperate.</p> <p>The Council have also submitted two separate Statements of Common Ground alongside the LPSD: the Liverpool City Region Spatial Planning Statement of Common Ground (Ref: SD010), which has been drafted collaboratively by the LCRCA, the 6 constituent Authorities and West Lancashire (Associate Member of the LCRCA), and a Statement of Common Ground has been produced with Warrington Council (Ref: SD012).</p> <p>The Plan's housing and employment allocations have been subject to a SA which assesses the likely social, economic and</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO0416, RO0425, RO0433, RO0436, RO0440, RO0441, RO0451, RO0460, RO0461, RO0472, RO0473, RO0474, RO0477, RO0478, RO0487, RO0489, RO0490, RO0491, RO0492, RO0493, RO0496, RO0506, RO0511, RO0517, RO0520, RO0525, RO0532, RO0542, RO0543, RO0561, RO0563, RO0563, RO0571, RO0581, RO0582, RO0583, RO0596, RO0598, RO0605, RO0609, RO0610, RO0618, RO0620, RO0621, RO0623, RO0629, RO0634, RO0635, RO0640, RO0647, RO0648, RO0650, RO0667, RO0668, RO0682, RO0683, RO0684, RO0685, RO0688, RO0689, RO0693, RO0702, RO0706, RO0708, RO0718, RO0719, RO0733, RO0736, RO0741, RO0742, RO0749, RO0756, RO0776, RO0783, RO0784, RO0795, RO0799, RO0804,	<p>development would have a negative impact on wildlife and existing biodiversity within these sites, with the Plan not satisfying the requirements for sustainable development but promoting increased car dependency as sites have been identified on 'edge of existing sites'.</p> <p>Numerous residents objected to proposed development sites in their area on grounds that local education facilities and health centres would not be able to cope with the potential new residents, these sites would create.</p>	<p>environmental impacts of the Plan. Recommendations made by the SA have informed the Plan preparation process.</p> <p>Whilst the LPSD has allocated land on the edge of the existing urban area, it also aims to continue the Council's long standing commitment to promoting urban regeneration and the re-development of brownfield sites (which make up a large amount of the housing land supply in the SHLAA) in the Borough's urban areas, which benefit from existing sustainable transport links.</p> <p>LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. These policies seek better transport links between housing sites and the new employment sites. Known biodiversity and geodiversity interests on sites are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.</p> <p>Equally not all new trips will be car based, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This should help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made.</p> <p>The IDP has provided an assessment of what infrastructure is required to support the proposed growth in the Plan and Policy LPA08 seeks to ensure that new development is supported by the appropriate development. The Development Plans team will continue to work with the Education department at St Helens Council to ensure there are a sufficient number of school places within the Borough to accommodate the projected needs. Similarly, the same consultation will continue with the St Helens Clinical Commissioning Group to help</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO0805, RO0817, RO0818, RO0820, RO0821, RO0828, RO0829, RO0831, RO0833, RO0835, RO0846, RO0849, RO0850, RO0851, RO0853, RO0856, RO0857, RO0860, RO0862, RO0863, RO0865, RO0867, RO0890, RO0902, RO0919, RO0928, RO0931, RO0937, RO0941, RO0942, RO0952, RO0964, RO0980, RO0981, RO0987, RO1004, RO1005, RO1009, RO1010, RO1024, RO1027, RO1029, RO1033, RO1034, RO1037, RO1054, RO1055, RO1056, RO1059, RO1062, RO1079, RO1080, RO1094, RO1095, RO1096, RO1097, RO1100, RO1101, RO1108, RO1116, RO1120, RO1132, RO1133, RO1140, RO1141, RO1143, RO1157, RO1163, RO1165, RO1166, RO1167, RO1168, RO1169, RO1170, RO1171, RO1172,		address and facilitate the impact of new development on existing health facilities over the plan period.
		The LPSD makes no reference to agricultural land or its industry. To encourage large population increases without proper consideration of food security for that population is folly and not sustainable. The loss of Grade 1 and 2 Agricultural land that comprises most of the designated allocated and safeguarded sites will have a negative impact on farming and distribution jobs is not considered within the LPSD.	<p>Though there is one site that involves Grade 1 agricultural land, the strategy generally avoids the most sensitive areas. The remaining sites that have been selected as development locations are those that are well-related to the existing built-up areas. Whilst some loss of agricultural land would still occur, this is justified by other sustainability factors.</p> <p>The Plan also promotes the regeneration of land, particularly brownfield land in the urban area.</p> <p>The St Helens GBR (2018) sets out how the sites to be removed from the Green Belt have been selected.</p> <p>Policy LPA04 of the Plan confirms (in paragraph 7) that appropriate proposals for the diversification of rural economy will be supported. The policy also encourages suitable proposals for the re-use of buildings in the rural areas for employment use.</p>
		The economic growth predictions are based on flawed historical data and as such are not justified but purely aspirational.	The LPSD employment land requirement seeks to meet the Borough's employment land objectively assessed needs, which have been assessed using a robust methodology which accords with the NPPF and PPG.
		The Plan should ensure that adequate land is allocated for housing in order to accommodate the population growth that would result from the provision of additional employment land.	The Council consider that sufficient land has been allocated to meet the Borough's objectively assessed housing needs, as set out in the in the reasoned justification in Policy LPA05.
		The LPSD fails to demonstrate that it has examined all reasonable alternatives. The Green Belt purpose of supporting urban regeneration is inadequately addressed. The cumulative impact of large-scale Green Belt release has not been considered.	The Plan has undergone SA where all reasonable alternatives to both the policies (including the spatial strategy) and site allocations have been assessed.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1173, RO1174, RO1177, RO1178, RO1179, RO1184, RO1188, RO1189, RO1190, RO1192, RO1193, RO1194, RO1201, RO1203, RO1204, RO1215, RO1217, RO1218, RO1219, RO1220, RO1223, RO1244, RO1247, RO1250, RO1253, RO1259, RO1262, RO1263, RO1266, RO1269, RO1270, RO1288, RO1289, RO1291, RO1294, RO1302, RO1307, RO1309, RO1310, RO1316, RO1318, RO1319, RO1324, RO1325, RO1348, RO1349, RO1350, RO1352, RO1364, RO1365, RO1368, RO1372, RO1373, RO1373, RO1375, RO1376, RO1379, RO1386, RO1390, RO1396, RO1404, RO1405, RO1406, RO1407, RO1414, RO1415, RO1420, RO1421, RO1427, RO1433, RO1434, RO1436, RO1438, RO1438,		<p>Paragraph 2.14 of the GBR (2018) explains the approach the Council has taken to assessing Green Belt Purpose 5 (NPPF Paragraph 134): <i>“to assist in urban regeneration by encouraging the recycling of derelict and other urban land.”</i></p> <p>Furthermore, there is insufficient land within existing urban areas, either within the Borough or in neighbouring authorities, to meet development needs over the Plan period.</p>
		There is a lack of infrastructure required to make the Plan viable. Concerned that public transport is not sufficient to meet the demands of new development.	<p>The IDP sets out what level of new or improved infrastructure will be required to deliver the growth proposed in the LPSD. It is an essential element in ensuring that the Local Plan is robust and deliverable.</p> <p>Policies LPA02 and LPA07 address the issue of sustainable transport. Policy LPA02 states that <i>“high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”</i>.</p>
		Objects to the spatial distribution of development. The amount of development proposed will increase the prospects for localised flooding.	Policy LPC12 addresses flooding issues associated with development. It establishes that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted.
		Objects to the lack of dedicated policy provision for Haydock Racecourse and the Green Belt designation on part of the Haydock Racecourse. Parts of the site are brownfield land and should be released from the Green Belt to accommodate related development to the Racecourse.	Comment noted. As indicated in the GBR (2018) this land is still considered to perform a valuable Green Belt function and it is therefore considered appropriate for it to remain in the Green Belt.
		There has been no consultation with Natural England over the loss of Grade 1 Agricultural Land.	Natural England is a statutory consultee and has been consulted at every stage of the LPSD preparation process.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1439, RO1443, RO1459, RO1466, RO1472, RO1475, RO1476, RO1494, RO1505, RO1513, RO1514, RO1515, RO1524, RO1545, RO1546, RO1549, RO1559, RO1564, RO1567, RO1584, RO1585, RO1586, RO1587, RO1588, RO1592, RO1611, RO1612, RO1614, RO1617, RO1621, RO1627, RO1634, RO1642, RO1651, RO1654, RO1655, RO1657, RO1658, RO1659, RO1660, RO1661, RO1670, RO1675, RO1678, RO1681, RO1699, RO1700, RO1711, RO1719, RO1720, RO1722, RO1723, RO1741, RO1743, RO1744, RO1751, RO1752, RO1753, RO1759, RO1770, RO1773, RO1774, RO1775, RO1776, RO1780, RO1783, RO1786, RO1787, RO1790, RO1791, RO1792, RO1793,	<p>The Council has not demonstrated 'exceptional circumstances' under section 13 of the NPPF. The Plan does not make effective use of unsuitable brownfield and underutilised land outside of the Brownfield Register or optimises housing standards. Accelerated Growth Scenario predictions for aspirational employment growth are not robust enough to justify the housing targets. Green Belt and safeguarded sites are not sustainable development and are not needed.</p> <p>Due to the base date of April 2017, we do not consider the 2017 SHLAA represents an up to date evidence base particularly when the Examination of the Local Plan is unlikely to take place until late 2019 at the earliest, at which point the SHLAA will be two and a half years old.</p> <p>The Plan needs to give more definition to how Junction 23 of the M6 will be improved to avoid a cumulative severe impact. The Plan and Regional Proposals for transport will lead to a 'severe' impact on St Helens highways network, contrary to the NPPF. The LPSD transport proposals are not sustainable or sound.</p>	<p>In accordance with the NPPF in order for the Local Plan to be sound, the Plan must provide a strategy which, as a minimum, seeks to meet the Borough's objectively assessed needs.</p> <p>As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs. Exceptional circumstances therefore exist to release land from the Green Belt. The Council consider this is a robust approach and is consistent with national policy. The housing requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, whilst preserving the Green Belt.</p> <p>The housing supply identified in the SHLAA is considered robust. The Housing Need and Supply Background Paper (Ref: SD025) submitted with the LPSD, provides an update to the housing supply position established in the 2017 SHLAA.</p> <p>The Council has commissioned a study into improvement options at junction 23, which is being undertaken in partnership with Wigan Council and Highways England. This Study will provide a detailed identification of capacity issues and an outline of potential options for further development. It is envisaged that it will ultimately determine the scale and design of a potential large-scale improvement scheme for Junction 23.</p> <p>Policy LPA07 addresses transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1805, RO1824, RO1839, RO1842, RO1848, RO1849, RO1871, RO1872, RO1873, RO1875, RO1879, RO1880, RO1882, RO1884, RO1891, RO1892, RO1894, RO1895, RO1897, RO1912, RO1917, RO1918, RO1919, RO1920, RO1921, RO1922, RO1923, RO1933, RO1934, RO1935, RO1953, RO1960, RO1961, RO1969, RO1982, RO1985, RO1987, RO1988	Proposed employment development is almost entirely warehousing and distribution, which is low value, low density employment.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR.
Chapter 1: Introduction			
Chapter 1	RO1634	Concern as to the Council's aspirations for contributing to the growth of the LCR as a whole. The LPSD appears to promote development of the Borough's needs rather than the wider LCR's.	Through the LCR SoCG the Council have made a commitment to cooperate with the other LCR authorities to ensure that LCR development needs are met. The LPSD employment land requirement builds in flexibility to meet sub-regional B8 strategic land needs resulting from the Strategic Housing & Employment Land Market Assessment (SHELMA).
Chapter 2: St Helens Borough Profile			
Chapter 2	-	-	-
Chapter 3: St Helens Borough in 2035			
Spatial Vision	RO1946 RO0375 RO1634	Support the Spatial Vision of the LPSD as it is consistent with national policy and will help to bring forward positive economic and social change, as well as being sufficiently aspirational.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1634 RO1244 RO1956 RO1145	Support the LPSD's Spatial Vision of creating high quality employment development. Agree that established employment areas will continue to provide affordable accommodation for a wide range of employers.	Support noted.
		Support the overall Spatial Vision, particularly the provision of good quality new market and affordable housing, and the broadening of the housing stock to meet local needs.	Support noted.
		The Vision does not refer to the Bold Forest Garden Suburb. This should be a key aspect of the Plan and specific reference should be made to it within the Vision. Site 4HA is a clear aspiration of the Council it should be included within the Spatial Vision.	Comment noted. However, the Spatial Vision is still considered sound without the need to specifically reference this site.
Strategic Aims & Objectives	RO0159, RO0375, RO0732, RO1145, RO1244, RO1634, RO1967, RO1968	Support the objectives of the Plan: objectives seeking the population growth, together with the provision of sufficient land to meet local employment needs and support the implementation of sub-regional growth strategies are both welcomed, as are the objectives aimed at the delivery of sustainable communities and the delivery of a range of new dwellings, both market and affordable.	Support noted.
		Support the inclusion of Objective 1.3 to ensure that effective use is made of previously developed land and Strategic Aim 4 that acknowledges the need to identify sufficient land for a sufficient number and range of new homes.	Support noted.
		Generally supportive but Objective 4 should refer to the aspirational need for detached family homes to address the clear deficit in the Borough, as referenced in paragraph 2.5.1.	It is not necessary to refer to detached family homes in the objectives as this need may change within the Plan period.
		Strategic Objective 4.1 should be amended as the word 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.	The Council consider this is a robust approach and is consistent with national policy.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		Supports Strategic Aim 5, which seeks to maximise the contribution of St Helens to the economy of the LCR and adjacent areas, by ensuring an adequate supply of employment land and premises to meet local employment needs.	Support noted.
Chapter 4: Core Policies			
Policy LPA01: Presumption in Favour of Sustainable Development	RO0012, RO0013, RO0014, RO0017, RO0066, RO0110, RO0209, RO0235, RO0258, RO0281, RO0282, RO0366, RO0375, RO0568, RO0574, RO0604, RO0620, RO0621, RO0628, RO0759, RO0849, RO0850, RO0851, RO0872, RO0875, RO0904, RO0950, RO0951, RO1076, RO1093, RO1114, RO1116, RO1152, RO1154, RO1164, RO1178, RO1179, RO1184, RO1241, RO1244, RO1470, RO1471, RO1472, RO1473, RO1474, RO1495, RO1540, RO1541, RO1542, RO1620, RO1634, RO1761, RO1952	Supports the inclusion of Policy LPA01 and the approach taken by the Plan in relation to the presumption in favour of sustainable development. It is essential for this policy to be included in the Plan, as it demonstrates compliance with paragraph 11 of the NPPF.	Support noted.
		To ensure the Plan's approach is sound in being positively prepared, it is suggested that the wording of paragraph 1 of Policy LPA01 refers to key themes of the NPPF such as 'significantly boosting the supply of homes'.	Comment noted. However, the Council do not consider it necessary to amend the wording of paragraph 1.
		Generally supportive but object to the second sentence in paragraph 1 as the Council have limited resources to work proactively with applicants sufficiently and it will become more difficult to resist appeals from developers.	Comment noted.
		Policy does not allow for a balance to be struck between benefits and harm as outlined in paragraph 11 of the NPPF and is inconsistent with national planning policy in this regard. The principles of sustainability advocated by this policy do not accord with those outlined within the NPPF.	Policy LPA01 is considered a robust policy in line with national policy.
		The material considerations test as set out in paragraph 2 is no longer referenced in the NPPF.	Policy LPA01 is in line with National policy, specifically paragraph 47 of the NPPF.
		Policy seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than plan-making. The Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan-making.	Not considered necessary.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		Policy could go further in its approach to ensuring the delivery of sustainable development that is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development required by the NPPF, which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the Plan. In this regard, Sustainable Development Statement contained in the draft Durham Local Plan can be referenced as an effective example of a local approach of how development proposals will be considered against the presumption in favour of sustainable development outlined in national policy.	Although sustainable development is defined in the NPPF paragraph 11 and the LPSD does not duplicate this, when read as a whole (including the vision, strategic aims and objectives) the LPSD sets out what sustainable development is in the St Helens Borough. Therefore, to include additional reference to this in Policy LPA01 would be repetitive and considered unnecessary. Policy LPA03: Development Principles, sets out a number of development principles that underpin the LPSD and represent a sustainable and balanced approach to the provision of new development, responding to the aims and objectives of the Plan, the SA and the requirements of national policy and guidance.
Policy LPA02: Spatial Strategy	RO0012, RO0013, RO0014, RO0015, RO0017, RO0034, RO0061, RO0066, RO0067, RO0100, RO0110, RO0117, RO0125, RO0146, RO0159, RO0207, RO0209, RO0225, RO0235, RO0258, RO0276, RO0281, RO0282, RO0360, RO0366, RO0375, RO0397, RO0440, RO0441, RO0461, RO0472, RO0505, RO0559, RO0565, RO0568, RO0574, RO0604, RO0620, RO0621, RO0624, RO0628, RO0633,	Supports the reasoning behind the need to release land from the Green Belt owing to the fact that every update of the SHLAA since 2010 has found that there is inadequate land in urban areas to meet housing needs in the longer term.	Support noted.
		Supports the sustainable regeneration and growth of the Borough including the allocation of site 10HA.	Support noted.
		Supports the Plan's intent to review and identify land within the Green Belt for Housing and Employment use, including the identification of land as Safeguarded for future need.	Support noted.
		Supports the proposed distribution of development and the overall spatial strategy for St Helens. There is inadequate land in the urban area to meet housing needs in the longer term. The policy addresses the housing delivery issues in the Borough through a revised spatial distribution and release of Green Belt land for housing.	Support noted.
		Supports policy in that it seeks to focus regeneration and growth in St Helens to the key settlements and direct new development to	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO0653, RO0660, RO0667, RO0668, RO0675, RO0731, RO0745, RO0759, RO0770, RO0798, RO0829, RO0831, RO0849, RO0850, RO0851, RO0872, RO0875, RO0891, RO0902, RO0903, RO0904, RO0933, RO0935, RO0950, RO0951, RO0977, RO1038, RO1059, RO1067, RO1074, RO1076, RO1087, RO1088, RO1093, RO1109, RO1114, RO1145, RO1152, RO1154, RO1159, RO1164, RO1165, RO1170, RO1178, RO1179, RO1184, RO1215, RO1232, RO1239, RO1241, RO1244, RO1265, RO1301, RO1328, RO1350, RO1364, RO1365, RO1375, RO1470, RO1471, RO1472, RO1473, RO1474, RO1495, RO1514, RO1525, RO1540, RO1541, RO1542, RO1555, RO1556, RO1567, RO1596, RO1601, RO1620, RO1625,	<p>sustainable locations; to enable movements between homes, jobs and key services and facilities by non-car modes of transport.</p> <p>Support the Council's spatial strategy and growth aspirations, and the intention to maintain existing employment areas.</p> <p>Supports the need for significant housing and employment growth, and the pragmatic approach in the Plan that brings forward development that, at a minimum, meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply.</p> <p>The Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the Borough.</p> <p>Supports the Plan's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. Also supports the need for development to be focussed on those Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth.</p> <p>General support for the strategy for sustainable growth from developers and landowners. However, a number objected to the distribution of sites and lack of detail as to how development across the Borough has been sought. Sites commented on include:</p> <ul style="list-style-type: none"> Sites 2HS and former LPPO HS06, as Newton-le-Willows is a large key settlement it should be apportioned a higher quantum of development, and therefore these sites should be allocated; Eccleston & Rainhill, should have more allocations due to their sustainable locations; An over provision of housing land within the St Helens Core Area and an under provision within Haydock and Blackbrook; and 	<p>Support noted.</p> <p>Support noted.</p> <p>Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The proposed sites identified for development have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1634, RO1656, RO1663, RO1677, RO1692, RO1693, RO1694, RO1699, RO1721, RO1732, RO1761, RO1791, RO1792, RO1793, RO1804, RO1809, RO1814, RO1815, RO1828, RO1832, RO1841, RO1848, RO1852, RO1864, RO1883, RO1917, RO1928, RO1929, RO1940, RO1944, RO1946, RO1948, RO1952, RO1953, RO1955, RO1956, RO1961, RO1962, RO1967, RO1968, RO1980, RO1983, RO1990, RO1991	<ul style="list-style-type: none"> There is no demand, need or valuable reason to build this volume of domestic properties within the Clock Face area. 	
		The objectives of this policy are considered to be sound and in accordance with National Policy.	Comment noted.
		Supports the Plan's proposal to distribute future development across the Borough to sustainable locations and recognition of Haydock as a Key Settlement.	Support noted.
		Supports the continued recognition of Rainford as a Key Settlement in the Plan, and also the acknowledgement that it is the largest village in the north of the Borough, upon which other settlements, including Rainford Junction, are reliant.	Support noted.
		Supports the identification of Garswood as a Key Settlements, in that it can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the Borough and development in these regions will lead to sustainable development.	Support noted.
		Supports paragraph 4.6.2 of the Plan in that it confirms that there has been extensive cooperation with nearby districts; and, it identifies the need, within the LCR, to accommodate the growth of the logistics and warehousing sector to support underlying economic trends and the growth of the port of Liverpool.	Support noted.
		Allocations in the Plan do not adhere to paragraph 1 or paragraph 2 as they are isolated away from settlements and in some cases located on the boundary of the LA, thus failing to meet the sustainability aspirations set by these paragraphs.	The proposed sites identified have been assessed using a number of balancing factors including sustainability of locations. There is insufficient land in the Borough's urban areas (and in those of neighbouring districts) to provide for future development land needs.
		Paragraph 1 fails to refer to the Site 4HA, as a key settlement, which should be recognised due to its importance within the Plan.	Comment noted; however, it is not considered necessary to do so.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Objects to the wording "as far as practicable", in paragraph 1. The inclusion of this phrase makes this policy ineffective in ensuring brownfield land will be developed over greenfield land.	The policy allows for a degree of flexibility and is considered robust and in line with National policy.
		The use of wording such as "the re-use of Previously Developed Land will remain a key priority" in paragraph 3 is not considered appropriate. National policy does not set such a high bar as to require development proposals to be located on PDL as a priority; it merely considers it preferable and does not discount the sustainability credentials of greenfield development proposals. The rationale for lowering the threshold for developer contributions for developers of brownfield sites is opposed given it is incorrect to assume developers on greenfield sites have less constraints.	The wording of paragraph 3 is in accordance with National policy. Development on previously developed land in Key Settlements will be encouraged by setting lower thresholds for developer contributions on such sites, as this remains a key priority of the Council's. This rationale is fully justified by the findings of the EVA.
		Objects to any prioritising or incentivising of one land type over another. Both greenfield and brownfield land have a role in the delivery of housing and whilst agree that brownfield will perform a role in the delivery of housing, possibly with fewer development contributions, greenfield land will still be required to deliver a consistent supply of housing over the plan period. Brownfield sites are not the only ones to face large abnormal development costs and object to this over simplistic assumption given that large greenfield development sites can often have significant opening up costs.	As above.
		Support the delivery of brownfield sites but these should not prejudice the delivery of sustainable residential development on other suitable sites. Support the provisions in paragraph 3 in lowering developer contribution thresholds but this should be evidence appropriately in the EVA.	Support noted, the rationale for this has been fully justified by the findings of the EVA.
		Generally supports policy and paragraph 4, but considers the text needs to be strengthened to reflect the harm that would occur from failing to meet the borough's housing and employment needs, by a slower economic growth, lack of labour force mobility, affordability	Do not consider that this is necessary. The policy is considered to be positively prepared.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		issues, disruption to commuting patterns and disruption to housing choice.	
		The Plan period should be extended to allow for delays in the adoption process. Advocate a Plan B approach to safeguarded sites whereby they come forward in the event of the Council not being able to demonstrate a 5-year supply of housing land, similar to the approach taken by West Lancashire Council.	The Council anticipate the Plan to be adopted in 2020, hence the Plan period runs from 2020 to 2035, which is clearly a 15-year period. Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded, will only be granted following a future Local Plan review that proposes such development. This approach aligns with the NPPF.
		Paragraph 4 should provide more clarity on when a full review of the Plan will be triggered.	Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary.
		Paragraph 6 refers to Parkside, the Council have overlooked the importance of the site 4HA, which should have its own specific reference and policy protection.	Comments noted, however, it is not considered necessary to add reference to site 4HA here. Site 4HA is referenced under Policies LPA05 and LPA05.1.
		The last sentence of Policy LPA02 clause 6 should be deleted as LPA04 is purely employment figures and LPA10 only refers to Parkside East as a Strategic Rail Freight Interchange (SRFI).	The reference to policies LPA04 and LPA10 is appropriate as these policies allocate sites 7EA and 8EA and set out site specific requirements.
		The provisions of paragraph 8 do not relate to the spatial strategy and are covered within Policy LPA11.	The criteria as set out in paragraph 8 are considered relevant to the Spatial Strategy. Policy LPA11 is a more detailed policy.
		The policy should be amended to ensure that it is positively prepared and flexible. Safeguarded Land is not allocated for development in the Plan period, therefore a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review should be included.	Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary, which will include assessing the level of need for housing and employment land compared to site supply. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			future Local Plan review that proposes such development. This approach aligns with the NPPF.
		The Plan's proposed release of Green Belt land for housing is not a reflection of the wishes of the residents of St Helens, and in that regard they are not being adequately represented by the elected Councillors.	The Government requires each local authority to have an adopted Local Plan. This must be reviewed regularly to meet the development needs of the area. If the Plan becomes out of date it no longer carries as much weight when planning applications are being determined, making it harder for the Council to resist proposals for inappropriate forms of development. A review in 2015 identified a deficit in employment and housing land provision in St Helens. This triggered a need to prepare a new plan to replace all parts of the Core Strategy and UDP Saved Policies. Further technical evidence base documents justify the release of Green Belt land in order to accommodate the necessary growth.
		Objects to release of Green Belt land and allocations for safeguarded housing for a future Local Plan which has yet to be consulted upon thereby pre-determining a scale of growth which is contrary to the community's wishes.	When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. Therefore, the Council have identified safeguarded land in order to ensure that longer-term development needs can be met stretching well beyond the plan period, as required by the NPPF.
		The Plan pleases developers and ignores the view of local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. To promote housing development in spite of these obstacles shows a disregard for NPPF guidelines as it is not positively prepared and not sustainable without a major revision of highway infrastructure.	Under the Duty to Cooperate, the Council has worked with neighbouring authorities on strategic matters such as transport. LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. These policies seek better transport links between housing sites and the new employment sites.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			Equally not all new trips will be car based, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This should help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made.
		Questions how the Plan weighs harm to the Green Belt in a specific area against the need for development where the need for development in that area has not been defined.	The need for new development has been assessed on a Borough wide basis and not for one particular area.
Key Settlements and spatial areas	RO1350	This section fails to refer to the Bold Forest Garden Suburb, as a key settlement or spatial area, which should be recognised due to its importance within the Plan.	Comments noted, however, it is not considered necessary.
Key Settlements Plan	-	-	-
Key Diagram	RO1940 RO0375 RO1656	The Key Diagram should provide greater clarity and label site 4HA. Currently the Key Diagram is vague. Key should be highlighted differently to other new housing sites on the diagram, reflecting their status and prioritisation within the Plan.	Comments noted, however, it is not considered necessary.
		Recognises the importance of the Key Diagram in illustrating areas of growth and areas where land is to be protected from development and welcomes the inclusion of site 4HA on the Key Diagram.	Support noted.
Policy LPA03: Development Principles	RO0012, RO0013, RO0014, RO0017, RO0034, RO0066, RO0159, RO0235, RO0281, RO0282, RO0327, RO0366,	Principles are supported and should be read in conjunction with policies LPA02 and LPA04. The objectives of this policy are considered to be sound and in accordance with National Policy.	Support noted.
		Supports policy and welcomes the recognition for a mixture of homes to meet the needs and aspirations of existing and future residents;	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0375, RO0565, RO0568, RO0604, RO0628, RO0872, RO0904, RO0919, RO0950, RO0951, RO1058, RO1074, RO1076, RO1093, RO1114, RO1116, RO1152, RO1154, RO1164, RO1244, RO1470, RO1471, RO1472, RO1473, RO1474, RO1495, RO1540, RO1541, RO1542, RO1620, RO1634, RO1656, RO1761, RO1788, RO1852, RO1854, RO1944, RO1953, RO1956, RO1962, RO1967, RO1968	and the promotion of effective use of land, buildings and infrastructure.	
		Supports the Plan's aspirations for development to be guided by a number of development principles, and the need for it to address the challenges faced through population growth; economic well-being; contribution to inclusive communities; contribution to high quality and built environment; minimising the need to travel; and lowering St. Helen's carbon footprint.	Support noted.
		Supports the development principles outlined within the policy as they are sufficient to guide development in the Borough without being overly onerous or prescriptive. Policy may need rewording to reflect that not all development will be able to respond in a positive way to each of the principles outlined.	Support noted; however, the policy is considered robust and in line with National policy and will not be amended.
		Generally, support the principles set out in the Policy for improving the economic well-being of the borough, and creating and retaining a range of employment and training opportunities.	Support noted.
		Supports policy but concerned that the Plan's strategies for unjustified employment and housing growth will mean that the policy cannot be delivered and the Council risk failing to meet NPPF Objectively Assessed Needs and being penalised.	The Plan's employment and housing policies are robust and based on a sound evidence base.
		Concerned that the Plan's allocated sites will not provide the choice of location and housing mix required by national planning policy.	The proposed sites identified for development have been objectively assessed as being the best that are available to meet the Plan's housing land needs. The allocated sites combined with the SHLAA sites and any windfall development will provide for a mix of site sizes and locations.
		Sport England suggests strengthening of the policy to include physical activity opportunities within the design of new developments.	Paragraph 7 largely addresses this issue by promoting healthy communities through improving access and opportunities for formal and informal recreation and improving cycling and walking routes.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			Policy LPA11 encourages the provision of opportunities for physical activity within the design of new development.
		Supportive of paragraph 6, part d), which sets the positive principle of supporting and retaining community spaces and other valued services.	Support noted.
		Parts (a) to (f) in paragraph 8 will need to be factored into any viability work.	The EVA provides a proportionate assessment of viability (satisfying the requirements of the NPPF and PPG) of future development sites in St Helens considering all relevant policies contained in the LPSD together with local and national standards.
Policy LPA04: A Strong and Sustainable Economy	RO0012, RO0013, RO0014, RO0017, RO0023, RO0034, RO0037, RO0038, RO0039, RO0064, RO0066, RO0073, RO0074, RO0076, RO0078, RO0099, RO0110, RO0117, RO0119, RO0120, RO0121, RO0122, RO0129, RO0130, RO0136, RO0138, RO0142, RO0146, RO0151, RO0155, RO0157, RO0159, RO0160, RO0187, RO0188, RO0194, RO0208, RO0209, RO0219, RO0235, RO0236, RO0237, RO0240, RO0241, RO0245, RO0249,	Supports policy, which seeks to maximise opportunities for economic growth, job creation and skills development.	Support noted.
		Supports the inclusion in the Plan of employment land requirements (a minimum of 215.4ha between April 2018 and March 2035).	Support noted.
		Supports the development principles, particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth.	Support noted.
		Supports the allocation of employment sites within the Gren Belt, particularly those along the M6 and A580 corridor as they will help ensure that St Helens can take advantage of its strategic location for logistic development; and the policy's aim to support the creation of and expansion of small businesses.	Support noted.
		The proposed strategic employment sites at Haydock are supported.	Support noted.
		The meaningfulness of paragraph 1 criterion a) should be questioned in that it indicates the intention that LCR will be assisted in meeting its needs for economic growth, job creation and skills development despite an economic growth scenario for the LCR requiring the	Whilst the LCR SHELMA 2018 identified a 'growth scenario' of 855 dpa for St Helens, this has been superseded by more recent evidence in the St Helens Employment Land Needs Assessment – Addendum Report January 2019.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0262, RO0263, RO0281, RO0282, RO0301, RO0306, RO0320, RO0327, RO0329, RO0331, RO0356, RO0363, RO0364, RO0366, RO0367, RO0375, RO0387, RO0388, RO0402, RO0406, RO0407, RO0410, RO0411, RO0412, RO0424, RO0428, RO0429, RO0442, RO0443, RO0452, RO0457, RO0458, RO0461, RO0462, RO0478, RO0479, RO0486, RO0487, RO0489, RO0490, RO0491, RO0492, RO0493, RO0502, RO0507, RO0517, RO0528, RO0544, RO0556, RO0558, RO0568, RO0574, RO0577, RO0591, RO0592, RO0596, RO0597, RO0604, RO0619, RO0620, RO0621, RO0628, RO0653, RO0660, RO0675, RO0688, RO0689, RO0690, RO0693, RO0731, RO0741, RO0742, RO0744, RO0755, RO0756, RO0757, RO0759, RO0771,	<p>support of a level of housing growth that would be far in excess of the proposed housing requirement in the Plan.</p> <p>Paragraphs 4 and 5 do not fully accord with the NPPF, which promotes a positive approach to applications for alternative uses of land currently developed but not allocated. The reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years and it should be considered that such sites will continue to form part of the housing land supply in the Plan period.</p> <p>Paragraphs 8 and 9 are supported and accord with paragraph 92 of the NPPF (2019).</p> <p>The employment land requirement is too low and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the LCR and North West in general.</p> <p>The Employment Land Needs Study (ELNS) indicates that St Helens has experienced low rates of delivery of employment land, especially compared to some of its neighbours, because of an inadequate supply of market attractive sites. Nonetheless, the ELNS calculates the Objectively Assessed Need predominantly from previous delivery rates. By using this method, the future supply will continue to be constrained. By way of comparison, had previously there been a better supply of market attractive sites, the delivery of land would have increased and the Objectively Assessed Need would rise.</p> <p>The LPSD fails to plan for meeting the objectively assessed need for employment development. The LPSD employment land requirement is too low based on a proper assessment of objective needs; the baseline employment land requirement should be increased to 225ha for the following reasons:</p>	<p>Policy LPA04 does allow for the change of use of existing employment sites, where justified.</p> <p>Support noted.</p> <p>BE Group in the ELNS (2015) used three averages for growth scenarios based on different time periods of the available historical data – 1997-2012 (Scenario 1), 1997-2015 (Scenario 2) and 1998-2008 (Scenario 3). The three periods were chosen for the following reasons:</p> <ul style="list-style-type: none"> • Scenario 1, 1997-2012: full data period available excluding the early forecast period (from 2012). This includes time periods when the overarching economic conditions varied, including strong growth, a recession period and slow recovery after the recession. • Scenario 2, 1997-2015: full data period available including the early forecast period (from 2012). This includes time periods when the overarching economic conditions varied, including strong growth, a recession period and slow recovery after the recession. It also includes the recent years, where it had become apparent that lack of land choice is a constraint in the market. • Scenario 3, 1998-2008: period of strongest growth in employment land take-up since 1997. This period is a time of

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0780, RO0781, RO0791, RO0792, RO0793, RO0794, RO0796, RO0810, RO0817, RO0818, RO0829, RO0831, RO0833, RO0841, RO0849, RO0850, RO0851, RO0852, RO0860, RO0868, RO0872, RO0875, RO0894, RO0902, RO0903, RO0904, RO0920, RO0931, RO0934, RO0940, RO0943, RO0950, RO0951, RO0967, RO0968, RO0982, RO0983, RO1010, RO1011, RO1024, RO1033, RO1034, RO1041, RO1042, RO1046, RO1053, RO1054, RO1058, RO1062, RO1072, RO1074, RO1076, RO1093, RO1107, RO1114, RO1116, RO1117, RO1118, RO1119, RO1127, RO1128, RO1145, RO1146, RO1152, RO1154, RO1157, RO1159, RO1164, RO1177, RO1178, RO1179, RO1182,	<ul style="list-style-type: none"> • The Council's selection of an extended period of 1997-2012 in identifying a baseline annual average serves to understate needs. The Plan projects future requirements based on past take up which has itself been limited by a constrained land supply. By rolling forward an annual average take-up which was deflated by land supply, the Council is simply perpetuating past deficiencies. • The logistics sector has been a key driver of employment growth over an extended period in St Helens, but with particularly strong growth over the period from 1998-2008. It is far more appropriate to base the employment land need on the 1998-2008 scenario period, when economic trends better reflected the positive growth strategy which the Plan purports to establish. 	<p>strong economic growth in the UK and the time period ends as the recession starts.</p> <p>Forecasts were based on the three scenarios, which resulted in a forecast range for employment land. The Scenario 1 and 2 forecasts were adopted as the baseline employment land requirement for St Helens in both the 2015 ELNS and the Addendum reports. This resulted in a range for the baseline employment land requirement.</p> <p>BE Group chose this approach for the following reasons:</p> <ul style="list-style-type: none"> • The longer time period of data upon which to base the forecasts meant that the data included stronger and weaker economic times, which is more likely to reflect the 25-year forecast period. • By using the two scenarios for the forecasts and thus having a range for the baseline employment land requirement, this was able to account for the inherent uncertainties within forecasting over a 25-year period. • The growth period scenario (Scenario 3) was considered to be too bullish and would require St Helens' economy to perform at peak levels over a sustained period. • Strategic warehousing demand due to major projects in the region (i.e. over and above typical St Helens growth) was considered separately above the baseline demand. <p>Since the original ELNS report (2015), the following factors have emerged in the market that are of relevance to this assessment:</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1183, RO1184, RO1188, RO1198, RO1203, RO1204, RO1216, RO1239, RO1240, RO1241, RO1244, RO1247, RO1259, RO1268, RO1289, RO1294, RO1321, RO1322, RO1323, RO1324, RO1364, RO1365, RO1372, RO1375, RO1396, RO1404, RO1405, RO1406, RO1407, RO1411, RO1412, RO1413, RO1417, RO1430, RO1443, RO1465, RO1466, RO1470, RO1471, RO1472, RO1473, RO1474, RO1486, RO1492, RO1495, RO1496, RO1513, RO1517, RO1524, RO1540, RO1541, RO1542, RO1545, RO1549, RO1555, RO1556, RO1557, RO1558, RO1559, RO1571, RO1572, RO1579, RO1580, RO1592, RO1620, RO1630, RO1631, RO1632, RO1634, RO1639, RO1640, RO1641, RO1656, RO1657, RO1658, RO1659, RO1660, RO1661,		<ul style="list-style-type: none"> • Key sites for large warehousing projects around Haydock were progressed in terms of gaining planning permissions. • Regional studies on the regional warehousing and logistics market continue to suggest strong growth in this market. • The 2015-2017 take-up period was low, suggesting continued land availability constraints dampening the market. <p>Therefore, the ELNS Addendum report (2019) revised the employment land requirement in two ways. The baseline forecast was revised, which kept the upper limit of the range but decreased slightly the lower limit (as the 2015-17 take-up was lower), though in the commentary it was stated that the upper limit was more likely to be a better representation of the market without supply constraints. Secondly, the additional demand due to strategic warehousing demand from major projects was increased. Therefore, the overall employment land need was increased compared to the original ELNS (2015).</p> <p>The growth period 1998-2008 represented a 'boom' time in the St Helens economy, reflecting strong growth in the UK economy and confidence in the market. To only consider such an outcome for St Helens over the 25-year period is likely to be overly optimistic for St Helens and a more balanced forecast would also consider the potential for low and moderate growth times. Furthermore, the growth period 1998-2008 was primarily led by B2 industrial demand, with some distribution floorspace also at irregular intervals. The online retailing market was only beginning to emerge as a significant player in the 1998-2008 period and distribution networks to support major retailers' online retailing had yet to be established widely. Therefore, this growth period was a different type to that anticipated in coming years. Therefore, the growth period average would only be an approximation of take-up and would need to be applied with</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1675, RO1678, RO1702, RO1711, RO1722, RO1733, RO1747, RO1751, RO1752, RO1753, RO1760, RO1761, RO1771, RO1772, RO1777, RO1780, RO1782, RO1809, RO1831, RO1845, RO1846, RO1848, RO1852, RO1877, RO1878, RO1881, RO1884, RO1911, RO1912, RO1917, RO1924, RO1939, RO1942, RO1944, RO1945, RO1949, RO1950, RO1953, RO1955, RO1956, RO1959, RO1961, RO1962, RO1965, RO1967, RO1968, RO1970, RO1978, RO1991		<p>caution. Adopting a longer-term average would also be an approximation but would help to remove some of the biases resulting from unusual (peak or trough) periods.</p> <p>It remains BE Group's opinion that the St Helens economy would not sustain the annual take-up levels matching the Scenario 3 growth period over the full 25-year forecast period. While growth may well be strong in the near-term, with the logistics sector looking for further land and there is likely to be some spike in take-up once the market is less constrained, it is BE Group's opinion that a high growth period would not be sustainable over the full forecast period.</p> <p>Given that recent take-up levels have been impacted by supply constraints, it is appropriate to discount the most recent growth rates. Looking at the annual take-up levels, 2012 appears to be a reasonable estimate of when supply constraints were starting to have a significant impact on take-up. The end of the 1998-2008 growth period was not due to the end of supply in St Helens, it was the economic downturn and resulting recession period experienced at this time. Therefore, in adopting such a time period upon which to base the forecasts, it would need to be understood that this period is a growth or boom period only and not a period selected because of its supply of land.</p> <p>Furthermore, it should be noted that current overarching economic conditions have softened, primarily due to Brexit, but also global economic and trade uncertainties have reduced confidence in the economy. Market uncertainty surrounding the economic impact of Covid19 must not be overlooked either. BE Group has observed some delays in property decision making in the local commercial market, as businesses wait for more certainty regarding conditions. This is a reminder that many factors may impact on take-up in the St Helens market</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			over the 25-year forecast period, that would mean peak growth levels are not likely to be sustainable over such a timeframe.
		<p>The Plan does not include a sufficient uplift to the baseline requirement to reflect the changing logistics market and the stimulant provided by significant infrastructure investment in the Borough and wider LCR. The Employment Land Objectively Assessed Need Report, identifies that especially due to the growth of the online retail market, the demand for logistics space has increased markedly over time and the average size of buildings has grown alongside this. The demand for land is greater, and in substantially larger parcels.</p> <p>For the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI, the appeal of St Helens to the increasingly active large scale logistics market; and the role it can and be expected to play in meeting growing sub-regional needs, the major projects uplift should be increased to 80 hectares compared to the 65 hectares proposed in the LPSD.</p>	<p>There is a limit to the resulting warehousing growth in St Helens from the retail market, with growth likely to plateau once key retail occupiers that want to be in St Helens establish a position. It is difficult to envisage that over the 25-year forecast timeframe that warehousing growth in St Helens to service the online retail market would need to continue at the current fast pace.</p> <p>In addition, at 234.08ha the LPSD employment land allocations are 18.68ha higher than the residual employment land requirement (excluding site 1EA). This approach is based on the need to reverse the suppression of employment land take-up the Borough has experienced since 2005 (caused by an inadequate supply of market attractive sites) and the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above the 65ha uplift already applied to the baseline Objectively Assessed Need. There is therefore considered to be sufficient contingency in the LPSD employment land allocations to meet sub-regional B8 strategic land needs and consequently there is no need to increase the Objectively Assessed Need.</p>
		The Plan is not meeting the minimum employment land needs of the borough and fails to provide a flexible and responsive supply of land. In order to address this deficiency, and to provide sufficient choice and flexibility over and above meeting the minimum needs, the Plan must allocate additional employment land. Haydock Point North (Site 2ES) is the most suitable candidate site to fulfil those requirements and should be allocated as a strategic employment site for development within the plan period rather than designated as safeguarded land.	<p>The Council has accepted that there are exceptional circumstances that justify the release of site 2ES from the Green Belt. However, the form and extent of any development that may be acceptable in the future at site 2ES is likely to be influenced by its interrelationship with Junction 23 of the M6. The Council has commissioned a study into improvement options at the junction, which is being undertaken in partnership with Wigan Council and Highways England. Therefore, until the Study is further progressed, and an optimum solution identified, development of Site 2ES could be</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			<p>prejudicial to the delivery of a future improvement scheme at Junction 23.</p> <p>Furthermore, it is considered that the employment land allocations in the LPSD will meet the employment land requirement identified in Policy LPA04. At 234.08ha the LPSD employment land allocations are 18.68ha higher than the residual employment land requirement (excluding site 1EA). This approach is based on the need to reverse the suppression of employment land take-up the Borough has experienced since 2005 (caused by an inadequate supply of market attractive sites) and the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above the 65ha uplift already applied to the baseline Objectively Assessed Need. There is therefore considered to be sufficient contingency in the LPSD employment land allocations to meet sub-regional B8 strategic land needs and consequently no need to increase the Objectively Assessed Need.</p>
		<p>Given the arbitrary nature of the 60 hectares identified and the commercial drivers underpinning infrastructure investment, the likelihood is that in excess of 60 hectares will be developed as SRFI or associated uses at Parkside (site 7EA). If the SRFI occupies in excess of 60 hectares then this will reduce the contribution that the site can make to meeting general employment needs. This will dilute the flexibility of the supply and increase the risk that the minimum land requirement is not met. This further highlights the need to build in additional flexibility by increasing the supply through the allocation of the Haydock Point North site (site 2ES).</p>	<p>The employment land requirement set out in Policy LPA04 is inclusive of a 5ha buffer to ensure flexibility. At 234.08 ha (excluding site 1EA) the LPSD employment land allocations are 18.68ha higher than the residual employment land requirement. There is therefore considered to be sufficient contingency in the LPSD employment land allocations, and thus the Council can meet its needs for employment development up to 2035 elsewhere within the Borough without site 2ES being allocated.</p> <p>If a SRFI scheme in excess of 60ha is developed at site 7EA, the need to allocate the safeguarded employment sites (1ES and 2ES) would be considered through any future Local Plan Review in accordance with Policy LPA06.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>The employment land requirement is too high and is based on over-optimistic assumptions. The employment methodology has significantly inflated the amount of employment needed, with an odd baseline (2012), five-year buffer included when this isn't a requirement, and included a major sites allowance without regional consideration, therefore failing the Duty to Cooperate. The LCR Local Enterprising Partnership growth scenario is flawed as all regions have to present high growth.</p> <p>A more reasonable approach would have been to use the long term 1997-2015 past take up figure for the Objectively Assessed Need, which would then give you a figure of 4.9hectares per year, 122.5 over the Plan period.</p> <p>The economic data is out of date and aspirational. It is based on a subjective land requirement scenario that bucks the trend where the take up of logistics warehousing is sluggish.</p>	<p>The employment land requirement set out in LPA04 seeks to meet the Borough's objectively assessed need for employment land, which are set out in the Employment Land Needs Study (ELNS) 2015, the ELNS Addendum Report (2017) and ELNS Addendum Report (2019). These studies identify a minimum Objectively Assessed Need of 227.4ha and indicate that sites in St Helens close to the M6 and M62 motorways will play a critical role in the North West large-scale logistics and distribution sector.</p>
		<p>Warrington Council support St. Helen's overall growth ambition and commitment to meeting its own employment needs.</p> <p>Regarding site 1ES Warrington agrees that this site will form an expansion to the existing Omega South strategic employment location, to meet the needs of Warrington, but will also provide employment opportunities to the residents of St Helens.</p> <p>The Council have developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega. This work has highlighted that both the local and strategic road network will be placed under considerable pressure when the current extent of the Omega site is fully developed.</p> <p>Warrington Council also suggest additional wording to be included in Appendix 5 for site 1EA.</p>	<p>Support for site allocation 1ES is noted.</p> <p>It is not considered necessary to include the suggested additional wording in the Appendix 5, as such requirements would be covered under Policies LPA03, LPA07, LPA08 and LPA04.1. Any future applicant for site 1ES would be required to consult with Warrington and St Helens Councils (as well as Highways England) on the scope and findings of the Transport Assessment and any mitigation measures.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Therefore, it would be for any future planning application for this extension to Omega to demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8. Any highway mitigation measures shown necessary would require appropriate contributions payable towards either the Council's programme of transport improvements and / or to Highways England. If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.	
		<p>With regards to site 8EA, Warrington Council states there are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.</p> <p>Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.</p>	Any future applicant for site 8EA would be required to consult with Warrington and St Helens Councils (as well as Highways England) on the scope and findings of the Transport Assessment and any mitigation measures.
		Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate. The employment demand should be just enough to meet the needs of the borough and not artificially inflated purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future employment land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the GBR (2018), there are considered to be exceptional circumstances that justify the release of employment sites from the Green Belt. The employment land requirement is supported by robust evidence as set out in the LPSD and the Employment Land Needs Study (2019).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		This Policy is contrary to the economic policies contained in the Bold Forest Park Area Action Plan (BFPAAP).	Any new development within the BFPAAP area would have to adhere with policies contained in both the LP and the BFPAAP. The economic policies within the BFPAAP can be successfully implemented alongside Policy LPA04.
		The Plan fails to acknowledge Policy BFP ECON1: Supporting Economic Growth in conjunction with Policy LPA04, which states that any proposal which would reduce the range and quality of businesses or tourism will be resisted.	It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. Therefore, development in this area will also have to accord with the policies contained in this document. The economic policies within the BFPAAP can be successfully implemented alongside Policy LPA04.
		Traffic increase from employment development will be intolerable; traffic is already over capacity within the Borough. Access to the employment sites is inadequate and dangerous, heavy goods vehicles will cause an extra burden on the local roads. Junction 23 of the M6 at the A580 is already a traffic black spot and the A49 along Warrington Road and through Ashton town centre is very often gridlocked. The added traffic generated by the proposed development will make a bad situation even worse.	The Council has commissioned a study into improvement options at junction 23, which is being undertaken in partnership with Wigan Council and Highways England. This Study will provide a detailed identification of capacity issues and an outline of potential options for further development. It is envisaged that it will ultimately determine the scale and design of a potential large-scale improvement scheme for Junction 23. Policy LPA07 addresses transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10.
		The Plan is insufficiently positively prepared proposing employment growth to facilitate the logistics sector which will not generate the employment or growth envisaged by the Plan. The Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics. These are exactly the type of industries St Helens can do without, given the already poor state of pollution and air quality in the area.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR. The employment land requirement is supported by robust evidence as set out in the LPSP and the Employment Land Needs Study (2019). Policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Concentrating on one industry (logistics) also contradicts national policy.	of air quality and traffic respectively associated with planned development.
		Large scale storage and distribution employment opportunities will not create the numbers of jobs or provided high value jobs to enable young people to stay in St Helens and afford to buy homes. There is nothing in the Plan that will provide "good quality" jobs for local graduates or will attract the "well paid" people to come and live and work in St Helens.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR. The employment land requirement is supported by robust evidence as set out in the LPSD and the Employment Land Needs Study (2019).
		The identified 215.4ha is unjustly excessive, and job growth projections are unlikely to become realistic. An economist has concluded that there is a lack of transparency over the process of the Oxford Economics Forecasts, which are policy led and not objectively assessed. Given that neighbouring authorities are planning for growth, there is no obvious source of people to take up the jobs in St Helens.	The LPSD seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG.
		Land at Sankey Valley Industrial Estate (site of the former Sankey Sugar Works - NLUD 431500004) should be allocated and identified as a Strategic Employment site in Policy LPA04.1 as a location where the "existing Industrial Estate could be expanded". Allocation would provide certainty about the site's remediation, future redevelopment and the benefits this would deliver.	This site does not lend itself to development that would lead to the increase of HGV movements in this location, as set out in appeal decisions APP/H4315/A/14/2215104 and APP/H4315/A/04/1160751. Both conclude that development would only exacerbate conditions that are already undesirable, resulting in material harm to, amongst other things, unacceptable harm to the safety and convenience of highway users, which conflicts with Local and National Policy insofar as it seeks to ensure the provision of safe and suitable access.
		Seek to remove the area of open space (off Junction Lane, Newton-le-Willows, WA12 8DL) to be designated as employment development. Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity. The site has attracted considerable interest from potential occupiers.	Any application for development of this site would have to accord with policies within the LPSD, specifically provisions as set out in Policy LPC05.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Object to the omission of land between site 2EA and Liverpool Road (field parcel 1403) from the Plan. The land should be removed from the Green Belt and allocated for housing. It is contended that once the Florida Farm North site (2EA) has been developed the inclusion of the omitted site within the designated Green Belt is illogical when matched against the principles of preventing unrestricted spread of development. The bund which now separates the Florida farm development from the Green Belt is not as strong a feature as Liverpool Road which is a more natural and definable boundary. The ribbon residential development along Liverpool Road already effectively impairs the purpose of the Green Belt to the South of Liverpool Road.	This land acts as a robust barrier between employment land and existing residential development. The Council do not consider it necessary to amend any site boundaries.
		<p>With regards to the former LPPO site HS11, the GBR (2018) should not be the sole determining factor for allocating of safeguarding housing. Specifically, in relation to this site as it is capable of delivery within the next two years. The GBR (2018) does not properly reflect deliverability or its advancement in comparison to allocated housing sites. It would be more appropriate to rank sites based on their impact on the Green Belt and this could easily be linked to the spatial distribution set out in the policy.</p> <p><u>Please see sections below on individual allocated sites for more specific comments made by local residents, developers/landowners and statutory consultees.</u></p>	<p>The findings of the GBR (2018) identify those areas where development could be accommodated whilst causing least harm to the purposes of the Green Belt. The assessment considers site-specific constraints such as flood risk, ecology and access. Therefore, the conclusions of the GBR (2018) have provided a key input into the selection of sites to be allocated for development, as identified in the LPSD.</p> <p>Furthermore, proposed development sites have been identified by assessing a number of balancing factors including sustainability of the locations.</p>
Table 4.1	RO0366, RO0486, RO0556, RO1241, RO1559, RO1656, RO1949, RO1953	Class B1 uses have been omitted from the appropriate uses.	Class B1 uses have not been added to the table, as these uses would not require planning permission anyway if they are truly ancillary to a Class B2 or B8 use.
		Regarding to site 8ES, Table 4.1 should include the potential for C3 uses to enable the preservation of national important heritage assets, amended policy wording in line with the previous planning applications should be undertaken.	This is not considered appropriate and the wording in the text will not be amended.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Table 4.2	-	-	-
Table 4.3	-	-	-
Table 4.4	-	-	-
Site 1EA	RO0136, RO0528, RO0653, RO0724, RO1216, RO1241, RO1244, RO1412, RO1950	Welcomes the provision of strategic employment sites within the Plan and the clear benefits these will bring to the Borough. The inclusion of this site is particularly welcomed as it recognises the benefits of having a large employment site close to a new key housing site in sustainability terms.	Support noted.
		Supports the Omega South Western Extension allocation within the Plan (1EA). As the agents of the owners of Omega Warrington.	Support noted.
		Supports this allocation but seeks an extension to the allocation to mitigate impact of development of the site upon the surrounding Green Belt.	Support noted. However, the Council does not consider a change in the site's boundary is necessary.
		This site is for Warrington's needs and not St Helens, Warrington has enough land in both brownfield and empty plots to use. This will lead to sprawl in the Green Belt contrary to national policy. All traffic will be through already heavily congested local distributor routes. HGVs will have to use inappropriate local roads which will lead to more air and noise pollution for local people and two schools.	Any future planning application for this site must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.
Site 2EA (see also section on Sites 2EA, 5EA & 6EA)	RO0366, RO0486, RO0502, RO0577, RO1430, RO1656	Strongly supports the allocation of this site for employment development and its removal from the Green Belt. However, the appropriate uses defined under the Use Classes Order do not reflect the extant planning permission and reserved matters approvals and that fact that ancillary B1 uses are a necessary function of distribution buildings.	Class B1 uses have not been included, as these uses would not require planning permission anyway if they are truly ancillary to a Class B2 or B8 use.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Development on this site will also exacerbate/increase risk of flooding along Clipsley Brook and Springfield Park.	The risk of flooding has been considered in the Environmental Statement that accompanied planning application reference P/2016/0608/HYBR. This assessed the effects of the proposals in terms of flood risk, drainage and hydrology.
Site 3EA	RO0780	Objects to loss of agricultural land and the associated environmental impacts to accommodate new employment development particularly when such employment is short lived following the end of incentives and introduction of automation which is leaving warehouses empty and unused.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs. The sites to be removed from the Green Belt have been determined in the light of the findings of the GBR (2018).
		There are already difficulties with traffic associated with heavy goods vehicles using local roads, this will only generate more.	The impact on local highways infrastructure is covered by relevant Policies (e.g. LPA07 and LPA10).
Site 4EA	RO0780, RO0366, RO0597, RO0934, RO1072, RO1375, RO1557, RO1558	The volumes of traffic will have an impact on Ashton businesses.	Policy LPA07 addresses the issue of traffic impacts from development.
		The Green Belt status of this site contributes to the divide between neighbouring communities, and this should be maintained, development will lead to urban sprawl.	The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.
Site 5EA (see also section on Sites 2EA, 5EA & 6EA)	RO0943, RO1557, RO1558, RO1962, RO1630, RO1632	The requirement to provide effective flooding management measures for Clipsley Brook to reduce the risk of flooding is not clear and contrary to paragraph 16 of the NPPF. We have identified no benefit in making any alterations to the watercourse in this location.	There are known flooding issues in this location and downstream. Therefore, any development of the site will have to be in accordance with Policy LPC12.
		Concerns raised regarding a water pipe which runs under the site.	Comments noted. Due consideration will be given to neighbouring Millfield Service Reservoir and the pressurised distribution main at masterplanning stage, with full consultation with United Utilities, who are aware of this proposed allocation and have not raised any objections to its designation for development.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Site 6EA (see also section on Sites 2EA, 5EA & 6EA)	RO0502, RO0943, RO1412, RO1430, RO1557, RO1558, RO1962, RO1630, RO1632	Concerns raised regarding a water pipe which runs under the site.	Comments noted. Due consideration will be given to neighbouring Millfield Service Reservoir and the pressurised distribution main at masterplanning stage, with full consultation with United Utilities, who are aware of this proposed allocation and have not raised any objections to its designation for development.
Sites 2EA, 5EA & 6EA	RO0023, RO0037, RO0038, RO0076, RO0078, RO0120, RO0121, RO0122, RO0129, RO0151, RO0160, RO0187, RO0188, RO0208, RO0236, RO0237, RO0240, RO0241, RO0262, RO0263, RO0320, RO0329, RO0331, RO0367, RO0387, RO0388, RO0406, RO0407, RO0428, RO0429, RO0442, RO0443, RO0462, RO0478, RO0479, RO0487, RO0489, RO0490, RO0491, RO0492, RO0493, RO0507, RO0544, RO0596, RO0689, RO0690, RO0741, RO0742, RO0744, RO0756, RO0757, RO0781, RO0791, RO0792, RO0793, RO0794,	Support the allocations of land for employment purposes on the M6 corridor for large scale logistics.	Support noted.
		Queried the justification for the development as there is currently vacant warehousing in Haydock.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR.
		Additional traffic generated by this proposed site will only add to local highway congestion on roads that are already over capacity. The junction of A580 and Haydock Lane is an accident blackspot.	Policies LPA07 and LPA08 address the potential issue of traffic from new development. The potential impact of sites 2EA, 5EA & 6EA on the local road network has been considered in the Local Plan Transport Impact Assessment 2018 and in the Transport Assessment that accompanied planning application P/2016/0608/HYBR.
		Warehousing development here will only speedup the decline of the Town Centre.	The Council's Town Centre Strategy (October 2017) ⁶ sets out aspirations for the future of St Helens town Centre. The LPSD is aligned with this Strategy which will enable the implementation of its recommendations including the identification of potential redevelopment opportunity areas to revitalise and enhance the Town Centre's retail and leisure offer.
		Haydock has lost a disproportional amount of Green Belt compared to other wards in the Borough.	Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The proposed

⁶ The Council's Town Centre Strategy can be viewed in more detail here: <https://www.sthelens.gov.uk/media/6855/1700262-st-helens-town-centre-strategy-booklet.pdf>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0796, RO0940, RO0967, RO0968, RO1010, RO1011, RO1041, RO1042, RO1117, RO1118, RO1119, RO1127, RO1128, RO1157, RO1182, RO1183, RO1198, RO1204, RO1240, RO1247, RO1259, RO1268, RO1294, RO1321, RO1322, RO1323, RO1324, RO1342, RO1372, RO1375, RO1396, RO1404, RO1405, RO1406, RO1407, RO1411, RO1417, RO1443, RO1466, RO1494, RO1517, RO1524, RO1571, RO1572, RO1579, RO1580, RO1631, RO1639, RO1640, RO1641, RO1678, RO1702, RO1722, RO1733, RO1747, RO1751, RO1752, RO1753, RO1831, RO1845, RO1846, RO1848, RO1877, RO1878, RO1881, RO1884, RO1911, RO1912, RO1939		sites identified for development have been objectively assessed as being the best that are available to meet the Borough's housing and employment land needs.
		The Plan is not balanced due to amount of warehousing being built in the one location.	LPSD employment allocations are supported by the Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (October 2017). These studies indicate that sites close to the M6 and M62 motorways will play a critical role in the North West large-scale logistics and distribution sector.
		There are no clear mechanisms for securing infrastructure contributions. The Plan fails to acknowledge the scale of financial gain the Council will get.	Comment noted. The developer contributions requirements set by Policy LPA08 will be subject to the statutory tests including being necessary to make the development acceptable.
Site 7EA		Strong support for the proposed allocation of this site and the key findings of the evidence base. The provision of a SRFI provides for something unique for the area. 7EA cannot be replicated at other	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
(see also section Sites 7EA & 8EA, and Policy LPA10 for further comments relating to this site)	RO0190, RO0245, RO0918, RO1413, RO1963	sites in St Helens, including brownfield sites. Development of the site will also support the ambitions of the LCR (and St Helen's Council) to bring significant investment and employment opportunities to the region.	
		Whilst supportive of a SRFI at Parkside concerned that the scheme could become a site for B2/B8 uses which are dependent upon road served freight.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use.
		Objects to extent of 7EA on the proposals maps which show the depicted route of rail freight on 8EA and the area calculation (5.58ha) for the rail freight route (see LPA04, Table 4.1, Footnote 17 and LPA10, para 4.36.16 on page 68-69). Inset Maps and Maps in Appendix 5 should be amended to reflect route in the current planning application (Phase 1) - P/2018/0048/OUP.	The alignment of land in Parkside West to provide a future siding for the rail uses in the Parkside East site is informed by relevant technical evidence. Therefore, no changes in this alignment are considered necessary at this stage. It is noted that planning application P/2018/0048/OUP has a different, smaller alignment for a proposed rail freight route, which may require an amendment to the Policies Map, but as this application is outline only no changes will be made at this time.
Site 8EA (see also section Sites 7EA & 8EA, and Policy LPA10 for further comments relating to this site)	RO0138, RO1074, RO1412, RO1486, RO1496, RO1559, RO1574, RO1940, RO1991,	Support allocation of 8EA.	Support noted.
		The policy and proposed removal of this site is considered sound as the site no-longer serves the five purposes of Green Belt.	Comment noted.
		Warrington Council state there are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a	When future planning applications for both Parkside sites (7EA & 8EA) are submitted, then St Helens Council will consult with Warrington Council (as well as Highways England and Wigan Council) on that specific proposal, which would include the scope and findings of a Transport Assessment and any mitigation measures submitted at that stage.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.	
		Enabling development for residential development will prevent the loss of two nationally important Grade II Listed Buildings. As it stands site 8EA is at odds with Policy LPA03 paragraph 5. part c) as no consideration has been given to the negative impact of the employment allocations upon designated heritage assets.	The impact of development on the two existing Listed Buildings within the site has been thoroughly addressed in planning application P/2018/0048/OUP. Historic England concluded that the proposed development would cause less than substantial harm. The application proposes mitigation such as a heritage trail with interpretive boards to allow views of the battlefield site, as recommended by HE.
		Objects to proposals maps depicting route of rail freight on 8EA. Maps should be amended to reflect route in the current planning application (Phase 1) - P/2018/0048/OUP.	The alignment of land in Parkside West to provide a future siding for the rail uses in the Parkside East site is informed by relevant technical evidence. Therefore, no changes in this alignment are considered necessary.
		Releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR. The employment land requirement is supported by robust evidence as set out in the LPSP and the Employment Land Needs Study (2019).
		Development in this location is unsustainable and incompatible with a high quality of life either for existing or new residents.	The Plan's housing and employment allocations have been through vigorous SA's and Strategic Environmental Assessments to address any social, economic and environmental impacts from the development.
		Development will be in very close proximity to residential areas in a small market town and therefore is not appropriate or acceptable. The operation of warehousing at Parkside will have significant impact on residential amenity as a result of noise and light given that it is likely to be a 24-hour 7 day a week operation. Whilst mitigation measures may be employed to reduce impact the objector is concerned that the impact however minimal will still be unacceptable.	Policy LPA03 will ensure that new development will secure a high standard of amenity for all existing and future occupants.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>Concerned that the current planning application proposals for development of Parkside are inconsistent with the LPSD policy, particularly in relation to the Plan's support for a rail freight terminal, which now appears to be "at risk".</p>	<p>Planning application (Ref: P/2018/0048/OUP) includes a parameters plan which proposes to safeguard an area of land within the application site for a rail reception siding to serve a potential SRFI on the east of the M6. The suitability of this rail reception siding to provide access to the site from the north has been considered as part of the planning application process.</p>
		<p>The 25-year Environment Plan (2018) and new Northern Forest and larger scale woodland creation. This must include 8EA as an important area that contributes to the Northern Forest.</p>	<p>Comment noted.</p>
Sites 7EA & 8EA	RO0136, RO0366, RO0457, RO0458, RO0502, RO0564, RO0619, RO0692, RO0841 RO1053, RO1106, RO1430, RO1760, RO1777, RO1809, RO1924, RO1970, RO1978	<p>There are no exceptional circumstances to justify the release of this land from the Green Belt. This land performs a role in checking unrestricted urban sprawl and assists in safeguarding the countryside from encroachment. The land also assists in preserving the setting and character of Newton as a historic town. The land itself also has historical importance being the final battle site of the Second English Civil War (Battle of Winwick). Key areas of the battlefield will be lost to development. The battlefield retains substantial integrity and is the only second civil war site which remains in a substantial state of preservation.</p>	<p>There is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs. Exceptional circumstances therefore exist to release land from the Green Belt. The Council consider this is a robust approach and is consistent with national policy. The housing requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, whilst preserving the Green Belt.</p> <p>The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.</p> <p>Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.</p> <p>Historic England has commented that although development would cause harm to the northern part of the registered battlefield, in the context of the battlefield as a whole, it considers the level of harm, although high, is less than substantial.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			Any development of the site would be mitigated with such things as a heritage trail with interpretive boards to allow views of the battlefield site, as suggested by Historic England.
		This is landscape of great Green Belt significance, there is a beauty to the area, it has a rugged character and charm, and it is an area of historical importance and most importantly for natural conservation.	Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.
		There is already an overabundance of warehousing in the Newton area which is threatening to encircle Newton.	Policy LPA04 places an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St Helens and the LCR.
		Concerned by the lack of published evidence to support the business case for a SRFI at Parkside.	The evidence supporting the Plan and Policy LPA10 is robust and is aligned with national policy.
		No form of access or egress from the Parkside development should be permitted onto the A49 once the new link road is installed for vehicles weighing more than 20 tonnes. This should be explicit in the Local Plan. This could be achieved by imposing a weight restriction.	The Parkside link road scheme is being assessed through the planning application process. The proposed Parkside link road will help address the potential for local congestion as a result of development at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
		Parkside fails Policy LPA03, as it will not create a range of employment and training, poorly served by public transport. Parkside sites cover part of a registered battlefield, Battle of Winwick.	Comments noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
		The justification for this site's removal is weak. Presently rail is not sufficiently attractive to logistics and this is unlikely to change. The region already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. It is not evident how this rail link will be funded.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		St Helens has so far not been able to find a company prepared to build and operate out of a SRFI terminal and this land should not be released only to be used for even more warehousing.	As evidenced in the Parkside Logistics and Rail Freight Interchange Study (2016), the opportunities for rail access from the Parkside site are considered to be second to none in the North West. Policy LPA10 recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60ha of the site is reserved for development of rail enabled use.
		There has been a lot of work in recent years rehydrating the moss and improving the natural habitat. Any development near the Moss will have a direct impact on the moss land and the birds and animals that live there and should be preserved for future generations. Furthermore, there are listed buildings on the site that would require demolition.	Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife. Impacts on heritage assets will be minimised through policies LPA04.1, LPA10 and LPC11. Heritage impacts have also been considered in the HIA of site 7EA & 8EA in the Heritage Background Paper submitted alongside the LPSD.
		The site is well used by residents in Newton, Lowton, Golborne and Winwick for recreational purposes.	Any impacts of a proposed employment site on sporting or outdoor recreation facilities should be capable of being addressed under relevant Plan policies.
Site 9EA	RO0073, RO0074, RO0138, RO0376, RO0377, RO0556, RO0558, RO0931, RO1949	Fully support the allocation of this site, however, the Council should plan for all foreseeable types of economic growth including B1 uses.	Appendix 5 states that the key requirements for this site are addressed in the approved plans and conditions attached to these permissions, namely planning applications P/2006/115 and P/2009/1046, both of which allow for B1, B2 and B8 uses. Table 4.1, and footnote 15, will be updated accordingly to include B1 use. MODIFICATION No. AM016
		This site should not be removed from the Green Belt. Rainford Industrial Estate currently has vacant units, which should be used first. No reasonable alternatives have been fully explored, including previously developed land, which would have less of an impact on the environment and infrastructure. The existing industrial estate in	Site 9EA does not lie within Green Belt land.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Rainford has a lot of derelict or empty space that can be used instead for the employment space mentioned in the Plan.	
		There are highway concerns, with 3 blind corners and narrow roads, which are extremely dangerous. The Plan does not show a direct access to Sandwash Close, nor does it show or infer access from Pasture Lane. The current accesses from Mill Lane and Sandwash Close are constrained and in order to attract new occupiers an improved new access from Pasture lane should be provided.	Access is achievable from both Sandwash Lane and Mill Lane, as clearly stated by the agent in paragraph 2.1 of this representation. The Council do not consider that a new access off Pasture Lane for this site is required. Planning consent has previously been approved for such an access, and as such if any potential developer requires a separate access then this should be sort through the development management process and not as part of the Local Plan.
		There is no need for this site to be used as industrial. There are plenty of vacant units available for warehousing and industrial uses only 10 minutes away on the A580.	The site already benefits from an extant planning consent (Ref: P/2009/1046), for the erection of two buildings for B1 and B2/B8 use (creating 1618m2 floorspace), formation of new access road and other ancillary works.
Site 10EA	-	-	-
Site 11EA	-	-	-
Policy LPA04.1: Strategic Employment Sites	RO0012, RO0013, RO0014, RO0017, RO0066, RO0157, RO0235, RO0281, RO0282, RO0366, RO0366, RO0375, RO0502, RO0564, RO0568, RO0604, RO0626, RO0628, RO0653, RO0692, RO0829, RO0829, RO0872, RO0904, RO0919, RO0950, RO0951, RO1076, RO1093, RO1106, RO1114, RO1152,	The objectives of this policy are considered to be sound and in accordance with National Policy.	Support noted.
		Support the use of a masterplanning.	Support noted.
		In support of the allocations for a significant area of land for employment purposes on the M6 corridor, including large scale logistics.	Support noted.
		Highways England, comment that the policy criteria approach of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported. It should ensure that the delivery of employment land-use is managed appropriately. Site-specific	The TIA documents published with the LPSD address cumulative impacts on the highway network. The Council does not consider that further work is required to address transport impacts from allocated employment sites. However, the site profiles in Appendix 5 have been updated accordingly.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1164, RO1241, RO1244, RO1430, RO1458, RO1470, RO1471, RO1472, RO1472, RO1473, RO1474, RO1494, RO1495, RO1540, RO1541, RO1542, RO1620, RO1656, RO1656, RO1761, RO1809, RO1848, RO1848, RO1852, RO1940, RO1944, RO1950, RO1962, RO1965, RO1966, RO1991	<p>analysis should be undertaken for each of the proposed allocated development sites to enable individual and cumulative impacts to be assessed. This should include site-specific infrastructure requirements at the Local Plan level.</p> <p>The most relevant site allocations to the Strategic Road Network, due to their size and proximity to Strategic Road Network junctions with existing performance issues, are 1EA, 2EA, 3EA, 4EA, 5EA, 6EA, 7EA, 8EA, and 10EA.</p>	<p>The Council is working in partnership with Highways England and Wigan Council to deliver the M6 Junction 23 Study. This Study will provide a detailed identification of capacity issues and an outline of potential options for further development. It is envisaged that it will ultimately determine the scale and design of a potential large-scale improvement scheme for Junction 23. Therefore, any required infrastructure improvements to Junction 23 from relevant employment sites that do not already have a planning permission (4EA, 5EA and 6EA), will be informed by the findings of this Study.</p>
		Objects to wording of policy and states that the criteria a) to j) should be provided within a planning application in association with a comprehensive masterplan for a Strategic Employment Site.	Comment noted.
		Paragraph 2, criterion e) refers to accessibility by public transport, it is essential that the cross-boundary connections with neighbouring authorities are considered, and the policy should acknowledge this.	Comment noted. However, the Council do not consider it necessary to amend the text.
		Policy LPA04.1 is sound but the typographical error in the footnote 22 referring to 6EA Site needs deleting as it should refer to 2EA.	<p>Typographical error in footnote 22 is acknowledged and will be amended accordingly to read 2EA and not 6EA.</p> <p>MODIFICATION No. AM022</p>
		Policy should seek to ensure that suitable planning obligations, particularly with regard to highway infrastructure, are incorporated into a development such as that proposed at 1EA, to ensure that planning obligations are not "unduly passed on" to nearby residential developments.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.
		Concerned regarding those large sites which are in multiple ownership. The achievement of sustainable development can potentially be compromised by developers / applicants working independently. Early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a	These factors have been considered in the GBR (2018) Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		legally binding framework, should be undertaken and the policy should be amended to address this.	
Policy LPA05: Meeting St Helens Borough's Housing Needs	RO0001, RO0002, RO0003, RO0004, RO0007, RO0012, RO0013, RO0014, RO0015, RO0016, RO0017, RO0023, RO0024, RO0037, RO0039, RO0054, RO0058, RO0059, RO0060, RO0061, RO0063, RO0066, RO0067, RO0073, RO0074, RO0076, RO0077, RO0078, RO0079, RO0080, RO0081, RO0085, RO0086, RO0087, RO0089, RO0096, RO0097, RO0098, RO0099, RO0100, RO0107, RO0108, RO0109, RO0110, RO0112, RO0113, RO0116, RO0117, RO0119, RO0120, RO0121, RO0122, RO0124, RO0125, RO0129, RO0132, RO0135, RO0136, RO0137, RO0139, RO0140, RO0142, RO0145, RO0146, RO0147, RO0149, RO0153, RO0154,	Supports the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the Plan period.	Support noted.
		Warrington Council support St. Helen's overall growth ambition and commitment to meeting its own housing needs.	Support noted.
		The Plan's approach of meeting the housing target firstly with housing allocations followed by sites with existing consents for housing development is supported, as this allows the Plan to manage the location of housing development strategically.	Support noted.
		The general proposed density of 30dpa is broadly supported.	Support noted.
		The Home Builders Federation (HBF) support the Council in monitoring the delivery of new homes annually (paragraph 4) to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and sufficient supply to provide the relevant 5-year supply plus the appropriate buffer.	Support noted.
		The HBF consider that paragraph 3 would benefit from an element of flexibility allowing developers to consider local and site characteristics, market aspirations and viability in determining the appropriate density of the site.	Comments noted. However, the Council consider the policy to be flexible and in line with national policy. The density requirements are a minimum and allow for some flexibility in specific circumstances.
		Supports paragraph 4, part b) that a Plan review will be undertaken should deliverable land supply fall substantially below the required level. However, a clearly defined timetable for a Plan review is required.	Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary. Therefore, it is not considered necessary to produce a defined timetable.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0155, RO0156, RO0159, RO0160, RO0161, RO0162, RO0164, RO0165, RO0170, RO0172, RO0173, RO0179, RO0184, RO0185, RO0186, RO0187, RO0188, RO0189, RO0191, RO0192, RO0193, RO0194, RO0195, RO0196, RO0197, RO0200, RO0208, RO0209, RO0214, RO0215, RO0216, RO0219, RO0225, RO0225, RO0227, RO0229, RO0230, RO0233, RO0234, RO0235, RO0236, RO0237, RO0238, RO0240, RO0241, RO0243, RO0253, RO0258, RO0262, RO0263, RO0264, RO0265, RO0271, RO0273, RO0274, RO0275, RO0278, RO0281, RO0282, RO0284, RO0285, RO0286, RO0290, RO0292, RO0293, RO0295, RO0299, RO0301, RO0306, RO0309, RO0311, RO0312, RO0316, RO0317,	<p>Support the masterplanning approach in this policy. The inherent flexibility in how 'indicative requirements will have to balance a range of design, ground conditions, infrastructure, environmental and viability issues. Similarly, the approach to open space will be considered at masterplanning stage, given its proximity to Victoria Park.</p>	Support noted.
		<p>Broadly support the principles in relation to development density. There should be flexibility to increase the density on sites that are required to provide community facilities and social infrastructure, to ensure land is being used efficiently and to prevent viability issues.</p>	Comment noted. The density requirements in Policy LPA05 are a minimum but allow some flexibility in specific circumstances.
		<p>Merseyside Fire and Rescue Service have a 10-minute response time, unfortunately some existing areas lie outside this time due to the rural nature of the area. Therefore, it is important that developers adopt high levels of engineered fire safety solutions e.g. sprinkler systems, particularly in the light on ongoing budget cuts to the fire and rescue service.</p>	Comment noted.
		<p>The new housing figure of 486 dpa is only a marginal uplift from the standard methodology.</p> <p>The Council has failed to take account of the scale of affordable housing need in setting the housing requirement, as required by the PPG. The Council's evidence confirms a substantial need which would not be met by a continuation of past delivery trends. The establishment of a higher housing requirement, aligned more closely to the need indicated as being required to support employment growth, would also offer significant opportunities to increase the provision of affordable housing to meet needs in full.</p>	<p>The LPSD seeks to align economic / jobs growth in the Borough with the appropriate provision of housing. The economic aspirations of the LPSD are significantly higher than baseline growth as identified in the ELNS. It is therefore ambitious in our opinion.</p> <p>The proposed housing requirement of 486 dpa is above the standard method which is intended to address affordable housing need by making housing more affordable thus reducing the need. Increased housing delivery through the LPSD will also increase delivery of affordable housing through developer contributions. This will help address supply.</p> <p>It should also be noted that the more recent 2018 affordability ratio shows an improvement from the previous year. The</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0318, RO0319, RO0320, RO0322, RO0323, RO0324, RO0326, RO0329, RO0331, RO0333, RO0334, RO0335, RO0336, RO0337, RO0338, RO0339, RO0340, RO0341, RO0342, RO0356, RO0362, RO0363, RO0364, RO0365, RO0366, RO0367, RO0368, RO0372, RO0373, RO0375, RO0376, RO0377, RO0378, RO0379, RO0383, RO0395, RO0397, RO0398, RO0399, RO0401, RO0402, RO0403, RO0404, RO0406, RO0407, RO0408, RO0410, RO0411, RO0412, RO0413, RO0415, RO0416, RO0417, RO0418, RO0419, RO0420, RO0421, RO0424, RO0425, RO0426, RO0427, RO0428, RO0429, RO0433, RO0440, RO0441, RO0442, RO0443, RO0444, RO0445, RO0447, RO0453, RO0454, RO0459, RO0460, RO0462,		standard method will also fall next year as the base period moves from 2019-29 to 2020-30.
		The Council should consider increasing the overall provision of new dwellings in order to address what will become a growing need within the Plan period.	<p>The standard method meets the need over the next 10 years and can be applied over the plan period as per paragraph 12 of the PPG:</p> <p><i>“The method provides authorities with an annual number, based on a 10-year base line, which can be applied to the whole plan period.”</i></p> <p>As the LPSD proposed housing requirement exceeds the standard method figure then it will also exceed the “growing need” over the Plan Period.</p> <p>In addition, the LPSD will be reviewed every five years and housing need will be considered as part of the review.</p>
		The Plan fails to accommodate the historic shortfall in relation to the Core Strategy.	<p>The PPG clearly states that the standard method (which the LPSD requirement exceeds) addresses historic backlog.</p> <p>Paragraph 2 of the PPG states <i>“The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.”</i></p>
		<p>Questionable whether the minor increase is sufficiently aspirational to support economic growth or materially affect affordability. It must be borne in mind that:</p> <ul style="list-style-type: none"> Recent assessments have supported a higher requirement. The adopted Core Strategy has a much higher requirement and a significant reduction is not in accordance with the Government’s intention to boost significantly the supply of housing. 	<p>The approach aligns with National Policy. The purpose of the EiP is to understand whether the Council’s approach is appropriate.</p> <p>The government’s attempt to improve affordability is crystallised in the standard method which is met and exceeded.</p> <p>Recent delivery has been high as a result of a number of strategic schemes starting to deliver high levels of output and</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0463, RO0464, RO0472, RO0473, RO0476, RO0477, RO0478, RO0479, RO0483, RO0484, RO0485, RO0486, RO0487, RO0489, RO0490, RO0492, RO0493, RO0498, RO0499, RO0501, RO0505, RO0506, RO0507, RO0509, RO0516, RO0521, RO0524, RO0528, RO0533, RO0534, RO0542, RO0543, RO0544, RO0549, RO0556, RO0557, RO0558, RO0561, RO0563, RO0565, RO0568, RO0574, RO0581, RO0582, RO0583, RO0586, RO0587, RO0591, RO0592, RO0594, RO0595, RO0598, RO0599, RO0600, RO0604, RO0606, RO0607, RO0608, RO0609, RO0610, RO0611, RO0613, RO0617, RO0620, RO0621, RO0624, RO0627, RO0628, RO0629, RO0630, RO0633, RO0636, RO0637, RO0638, RO0641, RO0649,	<ul style="list-style-type: none"> Gross completions in the last 4 years have been above the proposed requirement, peaking at 635 in 2014/15. This confirms the limited ambition of the proposed approach. 	in particular large private rented schemes. These sites are unlikely to be replicated across every year in the Plan period.
		The currently proposed housing requirement does not plan for boosting growth and increasing housing delivery across the country to 300,000 homes per annum.	<p>The 300,000 per annum figure is intended to be achieved through the use of the standard method. This was the stated intention of reverting back to the 2014-based household projection rather than the more recent 2016-based projections.</p> <p>As St Helen's is meeting and slightly exceeding the standard method then it is contributing more than it's fair share to the 300,000 dwellings per annum figure.</p> <p>Indeed, when compared with more recent 2016-based projections, the decision to revert to 2014-based results in a demographic growth which is 94 dpa higher (425 compared to 332 over the 2019-29 period).</p>
		The HBF are concerned that the evidence that justified the LPPO figure of 570 dpa is now being disregarded and that the Council should seek an uplift above that provided by the standard methodology.	The proposed housing requirement of 486 dpa is above the standard method. Indeed, the proposed housing requirement is an economic led figure which exceeds the standard method, and as such, in accordance with the PPG, should be assumed to be sound.
		<p>The standard method has limitations. It is a demographic – based minimum starting point. In areas such as St Helens with an ambitious employment growth agenda actual housing need should be higher than the standard method figure.</p> <p>There is a sound and justified case for a greater uplift:</p> <ul style="list-style-type: none"> More choice and competition in the housing market to provide a positive impact on affordability (over and above the affordability adjustment ratio in the standard method) 	<p>The proposed housing requirement is above the standard method, which is intended to address affordable housing need by making housing more affordable thus reducing the need. The increased housing delivery will also increase delivery of affordable housing through developer contributions. This will address supply.</p> <p>As one of the more affordable locations in the country there is no obvious requirement to make a further adjustment to address affordability.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0651, RO0652, RO0658, RO0659, RO0660, RO0664, RO0667, RO0668, RO0669, RO0674, RO0675, RO0676, RO0680, RO0681, RO0688, RO0689, RO0690, RO0693, RO0700, RO0702, RO0709, RO0710, RO0717, RO0720, RO0728, RO0729, RO0730, RO0731, RO0732, RO0735, RO0736, RO0738, RO0739, RO0741, RO0742, RO0746, RO0747, RO0748, RO0749, RO0756, RO0758, RO0759, RO0760, RO0762, RO0767, RO0768, RO0769, RO0770, RO0771, RO0777, RO0781, RO0782, RO0783, RO0784, RO0785, RO0786, RO0787, RO0788, RO0791, RO0792, RO0793, RO0794, RO0795, RO0796, RO0797, RO0801, RO0810, RO0811, RO0812, RO0813, RO0814, RO0815, RO0817, RO0818, RO0819, RO0820,	<p>•The ongoing trend of an increasing population creation and in migration</p> <p>•The full implications of employment creation and economic growth</p> <p>For these reasons it is reasonable, justified and sound to ‘maintain’ the long-standing ambition to achieve 570dpa.</p> <p>There is no explanation for the decrease from 570 dpa. Consider that the Economic Scenario 2 from the 2019 Strategic Housing Market Assessment (SHMA) (514dpa) is a more realistic number.</p> <p>As a starting point a housing number of 860 dpa should be investigated as it would align with the SHELMA, without a significant uplift the Plan cannot be considered positively prepared or effective. In the event that the Council does not consider such a housing requirement to be deliverable, it should at least aim to deliver the St Helens SHMA (January 2019) Update’s economic growth uplift requirement of 514dpa.</p> <p>The 486 dpa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of 461 dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).</p> <p>It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the</p>	<p>Being based on demographic projections the standard method also addresses trends of increasing population creation (natural change) and in migration. These draw on trends from 2008/9-2014.</p> <p>The housing requirement is based on a local assessment of economic led housing need which is slightly in excess of the standard method. In accordance with the PPG any number above the standard method should be seen as sound.</p> <p>The 514 figure is based on all the strategic sites being delivered at a faster rate (than scenario 3) whereas the preferred scenario retains this quicker rate of growth but does not expect delivery on all allocated and safeguarded sites within the plan period. Therefore the 514 dpa is largely redundant if these proposed allocations are accepted.</p> <p>The SHELMA growth scenario is based on a high-level assessment of strategic site capacity. Whereas in developing the LPSD it is clear that not all of these proposed sites would be delivered within the Plan period.</p> <p>The most recent data shows improvement in the affordability ratio. St Helens is also the 37th most affordable location in England and Wales out of 350. The overall need for housing also reflects the need for affordable housing while also addressing affordability.</p> <p>As well as the change in affordability ratio when the standard method moves on to cover the 2020-2030 period there is a slight reduction in the demographic starting point which reduces from 425 to 411 dpa.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0822, RO0823, RO0828, RO0833, RO0836, RO0837, RO0838, RO0839, RO0840, RO0844, RO0849, RO0850, RO0851, RO0855, RO0856, RO0857, RO0858, RO0860, RO0861, RO0862, RO0863, RO0864, RO0867, RO0868, RO0869, RO0870, RO0871, RO0872, RO0875, RO0883, RO0884, RO0885, RO0887, RO0889, RO0890, RO0891, RO0894, RO0906, RO0908, RO0909, RO0914, RO0919, RO0920, RO0921, RO0924, RO0931, RO0932, RO0933, RO0935, RO0936, RO0937, RO0938, RO0939, RO0940, RO0941, RO0942, RO0943, RO0944, RO0945, RO0950, RO0951, RO0952, RO0963, RO0967, RO0968, RO0969, RO0970, RO0971, RO0972, RO0973, RO0976, RO0978, RO0980, RO0982, RO0983, RO0987, RO0989, RO0990,	<p>486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.</p> <p>The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 LCR SHELMA, based on growth rates provided by the Liverpool Local Enterprise Partnership. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan.</p> <p>Utilising the Chelmer Model, we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855) if economic activity rates are adjusted to reflect a more realistic view of the District's labour market.</p> <p>Do not consider the housing figure to be the most appropriate to ensure the sustainable growth of the Borough, which is also significantly lower than the previous housing number. The Plan should, as a minimum deliver the standard housing figure. A more appropriate housing figure would be 604 dpa in light of the economic aspirations and in line with the scenarios set out in the SHMA.</p> <p>Utilising the industry standard POPGROUP demographic projection software, our analysis has confirmed, that delivery of the standard methodology figure (482 dpa) and also Policy LPA05 figure (486 dpa) would be insufficient to fully rebalance the Borough's working age</p>	<p>Combined with the new ratio this leads to a need for 445 dpa. So, the uplift is slightly more than perhaps it would appear on face value (9.2%).</p> <p>As 2.16 of the ELNS sets out the baseline forecasts for St Helens show a jobs growth of 4,700 jobs over the 2016-2040 period. This equates to 195 per annum.</p> <p>Table 4 of the SHMA update then states that scenario 2 results in a job growth of 11,967 jobs over the 16-33 period which equates to 703 jobs per annum. Albeit this is reduced following the removal of two sites at option stage.</p> <p>While this falls short of the overall growth in the SHELMA (17,100 over the 2012-37 period) on a per annum basis at 684 it equates to more. The level of jobs growth in the SHELMA is also underpinned by assumptions on improved economic activity rates. Therefore, if the economic activity rates are too high then due to internal inconsistencies in the model then so too are the jobs growth rates.</p> <p>There is no indication that a level as high as 1000 is realistic (i.e. is there demand) and that it could be sustained in the longer term.</p> <p>The LPSD seeks to align economic / jobs growth in the Borough with the appropriate provision of housing. The economic aspirations of the LPSD are significantly higher than baseline growth as identified in the ELNS. It is therefore ambitious in our opinion.</p> <p>It is not for the Local Plan examination to examine alternative levels of growth but to test the soundness of the Council's approach. Although the housing need number is not derived from the standard method it should still be a consideration at</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0994, RO1002, RO1003, RO1007, RO1008, RO1009, RO1010, RO1011, RO1012, RO1013, RO1018, RO1019, RO1020, RO1021, RO1024, RO1025, RO1026, RO1027, RO1029, RO1030, RO1031, RO1032, RO1033, RO1034, RO1035, RO1037, RO1039, RO1041, RO1042, RO1046, RO1054, RO1058, RO1059, RO1059, RO1060, RO1062, RO1067, RO1073, RO1076, RO1078, RO1079, RO1080, RO1085, RO1086, RO1089, RO1090, RO1091, RO1092, RO1093, RO1100, RO1101, RO1104, RO1107, RO1108, RO1109, RO1112, RO1114, RO1116, RO1117, RO1118, RO1119, RO1120, RO1127, RO1128, RO1130, RO1131, RO1133, RO1134, RO1135, RO1136, RO1143, RO1144, RO1145, RO1146, RO1152, RO1154,	<p>population by the end of the Local Plan period. However, a housing figure of 578 dpa over the Local Plan period, which represents a 20% uplift to the standard methodology figure would have the positive effect of significantly contributing towards stabilising the Borough's working age population by the end of the Local Plan period (2035).</p> <p>In relation to the SHMA, of concern is that the 'non- B' Class job growth' has been underpinned by the Oxford Econometrics baseline economic forecasts as opposed to the 'non-B Class job growth' arising from the Growth Scenario forecast, which takes into account the wider job creation impacts arising from the proposed B Class employment site allocations. Over the period covered by the Local Plan, the implication of using the baseline scenario as opposed to the Growth scenario appears to have under assessed the projected non-B Class employment growth by around 60 jobs per annum (circa. 1,140 non-B Class jobs over the Local Plan housing figure period).</p> <p>The unadjusted Scenario 2 job-led figure (514 dpa) would be the most justified economic-led housing requirement. However, this figure would need to increase to 537 dpa to take account of the required housing losses to demolitions adjustment (26 dpa). However, we are mindful that this job-led housing scenario:</p> <ul style="list-style-type: none"> • Under assessed non-B Class jobs growth over the Local Plan period; • Fails to adequately reflect previous levels of housing delivery; and • Fails to ensure the Borough's working age population is stabilised over the Local Plan period. <p>Overall, we consider the most appropriate housing requirement for St Helens over the period covered by the Local Plan is 604 dpa. This figure being the standard methodology figure with a 20% policy on uplift and a further 26 dpa demolitions adjustment.</p>	<p>the EIP. Even if the Council were to rely on the standard method we are clearly in broad agreement with its outcomes.</p> <p>The OE jobs forecasts are off-the-shelf forecasts which are based on the relationship on a sector by sector basis between a local authority and the region. It would not consider drivers of growth (such as the proposed employment sites) which would accelerate job delivery to a level above past trends. So, in the SHMA GL Hearn were required to make a series of assumptions to translate this into a local labour force, population and housing need.</p> <p>The Council has gone for an alternative method to the standard method which results in a slightly higher level of growth than the standard method and this is encouraged by the PPG. Paragraph 15 of the PPG states:</p> <p><i>"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point."</i></p> <p>This is clearly the case in St Helens and thus the approach should be considered sound. This approach, because it is linked to an economic led level of growth, will also stabilise the population and as Table 22 of the SHMA update shows, the economic led housing need results in a 1,800 growth in the population aged under 65.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1155, RO1157, RO1164, RO1165, RO1166, RO1167, RO1168, RO1169, RO1170, RO1171, RO1172, RO1173, RO1174, RO1177, RO1178, RO1179, RO1182, RO1183, RO1184, RO1185, RO1186, RO1187, RO1188, RO1189, RO1190, RO1192, RO1193, RO1194, RO1195, RO1196, RO1198, RO1201, RO1202, RO1203, RO1204, RO1205, RO1216, RO1219, RO1230, RO1233, RO1234, RO1235, RO1239, RO1240, RO1244, RO1245, RO1246, RO1247, RO1254, RO1259, RO1265, RO1268, RO1269, RO1270, RO1271, RO1272, RO1278, RO1288, RO1289, RO1290, RO1291, RO1292, RO1294, RO1300, RO1301, RO1303, RO1304, RO1305, RO1308, RO1309, RO1310, RO1313, RO1314, RO1319, RO1321, RO1322, RO1323, RO1324,	<p>The economic growth scenario outlined in the LPSD is not achievable or sustainable, but extremely aspirational, based on data derived from optimistic Oxford Economics Forecasts. The forecasts contain a circular argument in that they are impacted upon by the input of supply i.e. land allocations not tested at examination, namely the release of Green Belt land. This is not an objectively assessed need, rather, it is a weighted, self-fulfilling circular argument.</p> <p>A more realistic developable supply figure of 7,666, rather than 8,478 should be carried forward. Whilst the LPSD may continue to support all sites within the identified supply to the level of yield assumed, the inherent uncertainty with respect to this supply and the risks of non-delivery would justify applying a 20% uplift to the overall housing requirement. Based on planning for at least 600 dpa as, the minimum suggested by Peel and applying the appropriate flexibility buffer, additional land to deliver in excess of 3,000 dwellings over the plan period will need to be identified through the release of further Green Belt land on top of the quantum already proposed for release.</p> <p>The LPSD underestimates the level of employment which can be created through the proposed employment allocations. AMION has undertaken a critique of the Council's forecasting of job growth and concluded that in the order of 17,000 additional jobs could be reasonably expected in St Helens over the plan period, based on its portfolio of employment land. There is a therefore a need for the LPSD to plan for the provision of between 600 and 800 residential</p>	<p>In accordance with the NPPF in order for the Local Plan to be sound, the Plan must provide a strategy which, as a minimum seeks to meet the Borough's objectively assessed needs.</p> <p>The Local Plan seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a robust methodology which accords with the NPPF and PPG.</p> <p>As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed employment land and housing needs. Exceptional circumstances therefore exist to release land from the Green Belt, The Council consider this is a robust approach and is consistent with national policy.</p> <p>The housing supply identified in the SHLAA is considered robust. The approach to housing land supply in Policy LPA05 (and explained in its supporting text), contains an appropriate level of contingency in the supply as a whole, including sites being delivered from the current urban areas and from areas released from the Green Belt. Therefore, there is no need to increase the allocation of Green Belt land for housing.</p> <p>It is noted that AMION have commented on the forecasts for employment within the ELNS Addendum report (2019) suggesting that these forecasts are too low. In particular, AMION cited differences in opinion of the potential employment on the Parkside sites. In preparing the forecasts for Parkside, BE Group adopted a lower density level of employment than typical for a distribution centre given the intended inland port nature of this hub. This will influence the distribution uses of the site. Users are potentially less likely to be labour intensive</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1325, RO1326, RO1327, RO1333, RO1334, RO1335, RO1336, RO1340, RO1341, RO1342, RO1343, RO1344, RO1345, RO1346, RO1347, RO1350, RO1367, RO1370, RO1371, RO1372, RO1373, RO1375, RO1377, RO1380, RO1383, RO1390, RO1391, RO1396, RO1400, RO1404, RO1405, RO1406, RO1407, RO1410, RO1411, RO1412, RO1415, RO1417, RO1418, RO1419, RO1420, RO1421, RO1423, RO1424, RO1425, RO1426, RO1427, RO1431, RO1432, RO1433, RO1434, RO1436, RO1437, RO1438, RO1439, RO1440, RO1441, RO1442, RO1443, RO1444, RO1447, RO1448, RO1450, RO1453, RO1459, RO1460, RO1461, RO1462, RO1463, RO1464, RO1466, RO1468, RO1469, RO1470,	<p>units per annum, which aligns more closely with the findings of the draft SHELMA.</p> <p>There is an absence of evidence to support the exclusion of sites used in the assessment as part of a sensitivity scenario, including land north east of Junction 23 of the M6. There is also an absence of robust justification to support the preference for trajectories which suggest a lower rate of job generation across the sites. There is therefore a need for the LPSD to plan for the provision of between 600 and 800 dpa, which aligns more closely with the findings of the draft SHELMA.</p>	<p>warehouse users (i.e. processing large quantities of small orders) and more likely to be hauliers connecting with the rail hub or bulk distribution. While this is unlikely to be exclusively the case, and the actual range of occupiers will be determined by market interest at the time of development, this assumption is considered appropriate for a distribution node around a rail hub. Furthermore, given the forecasts were prepared at a relatively early stage in the planning of the Parkside site, there was a level of caution implied in the forecasts that would allow for some of the land to be lost for productive employment uses (e.g. for open space provision, or constraints not enabling maximum development).</p> <p>BE Group prepared three growth trajectories for potential employment allocations, with assumptions outlined in the ELNS Addendum report (2019). Scenario 1 was the fastest growing scenario and assumes that all sites can proceed and are occupied within a relatively short time period. While this may be the case for some sites, and indeed St Helens has seen development of some of its employment sites over the last year or two, this is unlikely to be the case for all sites, given the complexity of development projects. Timely development of all sites assumes several factors are aligned for the sites including:</p> <ul style="list-style-type: none"> • landholder interest in developing the sites; • market interest; • viability of development, particularly with recent construction cost increases squeezing development projects; • overall economic conditions are favourable for development; • constraints on the sites are not significant or prohibitive; • the inland port at Parkside proceeds;

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1471, RO1472, RO1473, RO1474, RO1475, RO1476, RO1478, RO1479, RO1480, RO1485, RO1488, RO1489, RO1491, RO1492, RO1493, RO1495, RO1497, RO1498, RO1500, RO1502, RO1503, RO1504, RO1506, RO1511, RO1512, RO1513, RO1515, RO1516, RO1517, RO1518, RO1519, RO1522, RO1523, RO1524, RO1529, RO1530, RO1531, RO1532, RO1533, RO1534, RO1535, RO1536, RO1540, RO1541, RO1542, RO1545, RO1546, RO1549, RO1554, RO1555, RO1556, RO1560, RO1561, RO1562, RO1563, RO1567, RO1569, RO1571, RO1572, RO1573, RO1579, RO1580, RO1581, RO1582, RO1583, RO1589, RO1590, RO1591, RO1592, RO1593, RO1594, RO1595, RO1596, RO1597, RO1606, RO1610,		<ul style="list-style-type: none"> • broader regional infrastructure investment (e.g. logistics investment) is carried through; and • gaining planning permission. <p>While for several sites, the conditions for development would be in place and sites could proceed in the short term, it is unlikely that all sites would have a smooth development process. Scenario 1 was prepared as essentially a 'best case' scenario for development of the sites in St Helens, with Scenarios 2 and 3 introducing a level of pragmatism or realism into the growth trajectories.</p>
		The Council should consider a housing requirement which is closer to 600 dpa . In the context of the Growth Plans being pursued and the scale of job growth associated this should be viewed as very much the lower end of a potential range of need. The modelling has identified that in excess of 800 dpa could justifiably be identified as being needed where either the full scale of potential job growth is recognised or a more modest change in the commuting ratio across the authority is assumed.	The LPSD seeks to align economic / jobs growth in the Borough with the appropriate provision of housing. The economic aspirations of the LPSD are significantly higher than baseline growth as identified in the ELNS. It is therefore ambitious in our opinion.
		The use of displacement rates appear too high for B8 uses, and there is unsubstantiated application of comparatively modest multiplier rates. Again, reference to industry standard assumptions suggests a relatively significant scale of local departure, the result being again a lowering of the associated calculated job growth within the Council's evidence base. There is therefore a need for the LPSD to plan for the provision of between 600 and 800 dpa , which aligns more closely with the findings of the draft SHELMA.	As part of the research for the original ELNS, BE Group consulted with a sample of local businesses as well as undertook a business survey. Furthermore, BE Group talked to a range of local commercial property agents. These pieces of evidence highlighted the local nature of employment in St Helens – businesses' employees came from a relatively localised area. Furthermore, property enquiries to commercial agents were generated largely by local St Helens businesses looking for alternative premises. Therefore, the employment displacement level was assumed to be higher as for several businesses it would be a transfer of their full workforce from one location in St Helens to another. However, for warehousing/distribution uses, the displacement was assumed to be lower, particularly for the Parkside areas due to the

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1611, RO1615, RO1616, RO1620, RO1622, RO1625, RO1626, RO1627, RO1629, RO1634, RO1635, RO1638, RO1639, RO1640, RO1641, RO1642, RO1650, RO1651, RO1652, RO1657, RO1658, RO1659, RO1659, RO1660, RO1661, RO1663, RO1664, RO1665, RO1667, RO1668, RO1668, RO1670, RO1675, RO1677, RO1678, RO1679, RO1680, RO1681, RO1682, RO1683, RO1692, RO1693, RO1694, RO1699, RO1701, RO1702, RO1703, RO1711, RO1721, RO1722, RO1723, RO1725, RO1726, RO1735, RO1736, RO1737, RO1738, RO1745, RO1747, RO1751, RO1752, RO1753, RO1754, RO1755, RO1756, RO1757, RO1759, RO1761, RO1770, RO1771, RO1772, RO1780, RO1781, RO1782, RO1783, RO1784, RO1786, RO1787,	<p>different types of employment and businesses that could be attracted to St Helens that are not already in the area (or have a lower representation).</p> <p>Edge Analytics has built a demographic cohort model using the POPGROUP suite of software, based on reasonable assumptions (as set out in Paper 2: Assessment of Housing). The model considers national economic activity forecasts produced by the OBR. Forecast changes have been applied to the rates recorded amongst different age groups in St Helens by the 2011 Census. This is considered to be a robust approach which applies reasonable assumptions on long-term changes in labour-force behaviour. It is understood that the approach differs from that taken within the SHMA Update, which derives a baseline position from forecasts produced by Oxford Economics. This is not considered to be a preferable method, given that the forecasting houses' outputs are iterative, unverified and often divergent from earlier iterations or the views of other forecasting houses.</p> <p>The modelling developed by Edge Analytics assumes that job growth is supported in a balanced way, with a ratio of 1.0 effectively assuming that every new job is filled by resident labour. As a result, a more balanced commuting ratio of circa 1.17 is achieved by the end of the plan period, continuing the improving trend observed since 2001 when a ratio of 1.26 was recorded in the borough.</p>	<p>The Economic Activity Rate (EAR) assumptions used in the SHELMA and subsequent St Helens SHMA update reflect the fact that the EAR has a significantly lower rate in the LCR than nationally. As a result, the city region has a significantly larger latent workforce than the average local authority.</p> <p>By using a national growth rate such as OBR, even when adjusted to a local starting point would underestimate the growth potential in areas with low economic activity rates and over-estimate growth in areas of high economic activity rates. The assumptions G L Hearn have used are considered reasonable (i.e. for the Growth Scenario it is assumed that the EAR rises to half of the difference between the current rate and the national average rate from Oxford Economics (one of the country's leading forecasting houses) projection) by the end of the forecast period. G L Hearn believe that this is a reasonable assumption considering the significant opportunities for improvements within the City Region.</p> <p>While it is recognised that the Oxford Economic rates can change significantly between iterations the same can also be said about other sources such as Experian or OBR rates. This is notable in the OBR rates which increased considerably in more recent versions subsequent to the SHELMA.</p> <p>The 0.7 commuting ratio calculated by Turley's is not as suggested a significant divergence from evidenced trends. Clearly as the ELNS study sets out the 0.4 assumptions is based on surveys of workers within the Omega site. As stated at 5.19 of the ELNS this is based on "Postcode origin of workers data from three existing businesses in Omega Warrington reveal that some 40 percent of workers reside in</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1790, RO1794, RO1795, RO1799, RO1800, RO1801, RO1802, RO1804, RO1808, RO1813, RO1817, RO1818, RO1820, RO1821, RO1822, RO1823, RO1824, RO1825, RO1826, RO1828, RO1829, RO1830, RO1831, RO1838, RO1839, RO1845, RO1846, RO1847, RO1849, RO1852, RO1853, RO1857, RO1864, RO1867, RO1868, RO1869, RO1871, RO1872, RO1873, RO1875, RO1878, RO1882, RO1887, RO1890, RO1891, RO1892, RO1893, RO1894, RO1895, RO1897, RO1898, RO1903, RO1904, RO1905, RO1906, RO1911, RO1912, RO1916, RO1918, RO1919, RO1920, RO1921, RO1922, RO1923, RO1925, RO1932, RO1933, RO1934, RO1935, RO1937, RO1938, RO1939, RO1944, RO1946, RO1948, RO1951, RO1952, RO1953,	<p>In the SHMA there is a fundamental inconsistency between the adjustments made to B class and non-B class jobs for commuting. An overall commuting ratio of 1.21 is applied to non-B class jobs, in line with the position recorded in 2011. In contrast, the SHMA effectively applies a commuting ratio of 0.4 to B class jobs. This results in an overall commuting ratio of circa 0.7, which implies a significant divergence from evidenced trends. It would also have significant implications on displaced housing need pressures in other neighbouring authorities, where the homes required to accommodate the other 60% of jobs on the employment sites would need to be provided. The SHMA Update does not acknowledge this implicit assumption or make any attempt to justify or validate such a marked departure from current trends. This position is not supported by either the current generation of emerging Local Plans in neighbouring areas, or any emerging outputs of a spatial framework for the City Region. Whilst it is considered reasonable to anticipate some change in commuting dynamics where St Helens provides for above trend employment growth – itself linked to providing for unmet employment land needs – the implied scale of change is unsubstantiated in the evidence, and unjustified.</p> <p>Section 3.0 of the SHMA Update models a new scenario which takes account of the 2017 MYE and applies these into its 2016-based Sub-National Population Projections scenario modelling. As set out above, this has the effect of increasing the 2016-based Sub-National Population Projections housing need figure from 391 dpa to 398 dpa. Neither figure appears to have been uplifted to address affordability issues as required by the PPG. However, setting this to one side, it is inconsistent to factor in the 2017 MYE population figures to the 2016-based Sub-National Population Projections, but not the 2014-based Sub-National Population Projections. This would clearly have an impact on GL Hearn's modelling figures.</p> <p>Setting to one side the fact that GL Hearn is suggesting that only 40% of the B-Class employment jobs are actually going to be taken up by local residents, with the remaining 60% (4,421 jobs) taken up</p>	<p>Warrington, 12 percent reside in St Helens, 8 percent in Wigan and 40 percent elsewhere." The assumption is therefore clearly plausible given the additional and more up to date information.</p> <p>It is recognised that retaining more workers and drawing more workers than present from neighbouring authorities could have an impact on neighbouring housing need. However, in some cases these areas will have a high level of surplus workforce already living in the area. Furthermore, the Council through the Duty to Cooperate have asked whether any neighbouring authorities required them to meet their need. In all cases the response was negative.</p> <p>Furthermore, in order to meet the Borough's housing needs the Council has undertaken a review of Green Belt sites. It would be difficult to demonstrate exceptional circumstances to meet neighbouring authorities housing need without them too having considered the release of Green Belt land to the same scale as the St Helens GBR (2018) does.</p> <p>We recognise the outputs in Chapter 3 of the SHMA update demonstrates alternative numbers to the 2014-based projections. However, the standard methodology clearly and consciously moves away from the 2016-based projections and reverts back to the 2014-based projections.</p> <p>Chapter 3 therefore largely becomes redundant other than to demonstrate that more recent information would indicate a lower demographic need.</p> <p>The sites that are being released are strategic sites meeting the need for the wider LCR and indeed the North West. As such the decision to assume these would draw on a wider</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1954, RO1955, RO1957, RO1958, RO1959, RO1960, RO1960, RO1961, RO1964, RO1964, RO1967, RO1968, RO1971, RO1974, RO1975, RP1976, RO1977, RO1980, RO1990, RO1991	<p>by people commuting into the Borough from elsewhere in the North West. Bearing in mind that this relates directly to the 10 strategic employment sites covering 234 hectares of greenfield land across St Helens (Policy LPA04 in the emerging Local Plan excluding Omega South), it would seem pessimistic in the extreme, and presumably not what residents/elected members would envisage in sanctioning such large Green Belt land releases. This equates to less than 13 local jobs for every hectare of land released for B-Class employment use.</p> <p>Conversely, GL Hearn's modelling indicates that whilst there will be a net increase of 4,587 non-B Class jobs based in the Borough, this will somehow be filled by 5,544 local St Helens residents, a difference of +957. Further explanation is necessary to explain the discrepancy.</p> <p>The SHMA Update provides housing needs for a time period finishing in 2033 rather than the 2035 in the emerging Local Plan, its modelling has a base date of 2016. However, the job projections in the Employment Land Needs Assessment are at least partly based on translating B-Class Local Plan employment allocations into jobs. As can be seen in Tables 9, 10 and 11 of the Employment Land Needs Assessment, the start date for jobs coming forward on these sites is 2018. GL Hearn has made no adjustment for B-Class job growth in the years 2016 or 2017 in its modelling and assumes that the only job growth in these years will be in non-B-Class uses. This is clearly unreliable. Indeed, there has actually been very strong economic growth since 2016 in the Borough. ONS provides Business Register and Employment Survey [BRES] data for 2016 and 2017 at district-level. This indicates that in just one year, 2016-2017, total employment increased in the Borough from 60,825 to 64,645 – an increase of 3,820. This represents almost a third of the total job growth GL Hearn is allowing for the entire period to 2033 and it is erroneous to exclude it from the modelling. To include it would be likely to significantly increase the overall job growth, and the housing need would need to rise accordingly.</p>	<p>workforce informed by surveys of workers within the Omega site.</p> <p>In modelling the labour force growth required (table 6 of the SHMA update) to meet the non-b jobs growth (Table 4 of the SHMA update) we consider there to be a high level of out-commuting from the Borough (as per 4.9 of the SHMA update and table 5). This is somewhat tempered by the number of people with more than one job (4.11 of the SHMA update) (table 6). This calculation also assumes a number of these jobs will be taken up by improving economic activity rates within the Borough.</p> <p>The difference between the OE baseline growth and the OE Non-B class jobs growth over the period 2006-2018 is 468 jobs. This therefore is the number of b-class jobs created in that period according to the forecasts.</p> <p>However, at the point of the publication of the SHMA update (2019) these jobs had already been created irrespective of the level of floorspace or housing created. There would therefore be no need to plan to accommodate those working in these jobs as they already have a home.</p> <p>The same can also be said of the growth set out in the BRES data. We also need to be careful about BRES data on an annual basis as it has been known to be skewed by the response to the survey.</p> <p>Other than the census there is no basis to suggest that a greater percentage of local residents would take up these jobs. The BE assumptions reflect survey work on employees on that very site.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>Lichfield's' view is that recognition should be made in the modelling that local residents will take up a significant proportion of the jobs on offer at Omega South, which would increase the housing need accordingly.</p> <p>We consider that the alignment with the economic growth set out in the Employment Land Needs Assessment is flawed, and that the aspiration to grow the local economy by almost 12,000 jobs over the period to 2033 cannot realistically be achieved with a housing target of 486 dpa. The inevitable consequence of providing employment opportunities without the labour force to supply them will be a further increase in commuting rates into the Borough from further afield, which is not sustainable.</p> <p>There are inconsistencies in the timeframes between the SHMA (up to 2033) and the Local Plan (up to 2035) and it is not clear how this has been addressed.</p> <p>Inconsistencies in the methodology set out in Section 4.0 of the SHMA which undermines the reliability of the modelling. There is a suggestion that only 40% of B-Class employment jobs will be taken up by local residents, with the remainder taken up by people commuting into St Helens. This relates directly to the 10 strategic employment sites and is considered a pessimistic stance, with job growth relating to these sites and associated housing more likely to increase above 40%.</p> <p>It is unclear how the exclusion of the Omega South site has been modelling in the SHMA and the Employment Land Needs Assessment; it is therefore suggested that the modelling should recognise that local residents will still take up a significant proportion of the jobs on offer at this site which would increase housing need accordingly.</p> <p>The PPG is clear that where previous housing delivery has exceeded the minimum need it should be considered whether the level of</p>	<p>There is no basis to suggest that increased in commuting to St Helens is not sustainable.</p> <p>The standard method can be applied across any plan period as per para 12 of the PPG. Although the standard method is not used to derive the proposed housing requirement this principal should still apply to scenarios which exceed it.</p> <p>This is also the case for local authorities who have an economic based plan as typically economic growth forecasts slow in future to reflect greater uncertainty.</p> <p>The Omega site has been removed from the non-b class job growth assumptions in the different options. We have assumed no growth at the Omega South allocation.</p> <p>The consideration of a higher housing need based on past delivery trends as the PPG sets out "<i>Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.</i>"</p> <p>Previous housing delivery is linked to strategic sites and the delivery of large scale private rented schemes which are unlikely to be replicated throughout the Plan period. Noting that the longer-term averages are much lower and on a like for like basis growth of 486 dpa every year over the plan period will result in a significant uplift.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		<p>delivery is indicative of greater housing need. In the past 5 years; housing delivery has exceeded the Objectively Assessed Need figure of 486dpa. As such it is clear that the borough can absorb these quantities of housing.</p> <p>TW considers that there is a misalignment between the housing and employment land requirements. This positive and proactive approach to employment land is not consistent with the approach that has been taken towards calculating local housing need. Failure to align its housing requirement with its economic growth aspirations in Policy LPA04 will lead to barriers to achieving economic growth and unsustainable levels of inward commuting.</p> <p>Furthermore, considering the errors in the demographic analysis and taking account of previous housing completions, TW consider there to be an argument to further review the Objectively Assessed Need requirement. On this basis it is considered that the Council should opt for a higher housing figure, based on refined evidence in the SHMA to encourage a reasonable level of housing to support economic growth aspirations.</p> <p>A 2.7% discount is applied to the jobs growth figures to allow for double jobbing. However, the 2.7% figure is taken from the Annual Population Survey and is not considered to be directly applicable to the full time jobs created through the employment allocations in the emerging plan. In our view no such discount should be made. An adjustment has been made to economic activity rates. In our view this is not justified.</p> <p>The evidence base should recognise that there are regional differences in economic activity rates and the assumption made is entirely arbitrary.</p>	<p>No assumption is made regarding what jobs are taken up by those with more than one job. This might be those with a full-time job at the allocation and part time job elsewhere. It is a fairly standard approach to use the Annual Population Survey to apply the double jobbing rate. Note that the approach is not to get to the national average but to a rate which is midway between the national average and the local baseline. These changes are relative to each local authority so areas such as St Helens have a smaller adjustment than Knowsley and Liverpool. This also contributes to the level of economic growth assumed in the SHELMA.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Paragraph 4.12 of the SHMA Update also recognises that unemployment in St Helens is already low and further significant improvements are unlikely.	
		There is an inconsistency, as it is not considered sound not to use a 20% allowance for non or stalled delivery to both SHLAA and Green Belt sites. Applying a consistent allowance will further require additional sites to be allocated for housing delivery.	The approach to housing land supply in Policy LPA05 (and explained in its supporting text) contains an appropriate level of contingency in the supply as a whole. Including sites being delivered from the current urban areas and from areas released from the Green Belt.
		There is an over reliance on sites identified in the SHLAA. The Council have over-estimated the number of dwellings that are realistically likely to come forward. Delivery of sites has slipped, and there is no evidence to suggest that these would not slip again. As such additional Green Belt land for at least 3,560 dwellings must be identified and released.	The housing supply identified in the SHLAA is considered robust. Furthermore, the housing requirement set out in Policy LPA05 already contains an allowance of 15% for non-delivery on SHLAA sites and 20% contingency on the Green Belt supply to allow for delays on Green Belt site delivery. Therefore, there is no need to increase the allocation of Green Belt land for housing.
		The Council's Development Trajectory (Appendix 5 of SHLAA 2017) lacks sufficient detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the Plan period, although it is not clear what assumptions have been made to determine those sites cannot start now but are likely to come forward after 6 or 10 years.	The housing supply identified in the SHLAA is considered robust.
		The 2017 SHLAA relies too strongly on untested sites without the benefit of planning permission and stalled sites that benefit from planning permission. Therefore, the deliverability of sites is strongly questioned.	The housing supply identified in the SHLAA is considered robust.
		Too strong a reliance on large-scale strategic sites either currently designated Green Belt or not. Again, deliverability of sites is strongly questioned. (Objector has undertaken their own assessment and	The housing supply identified in the SHLAA is considered robust.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		critique of allocations and is seriously concerned that the sites are not as suitable as theirs).	
		The Council has identified a significant number of sites as deliverable within five years, but which are still in the hands of private landowners or occupied by existing businesses. These sites should therefore not be considered deliverable, but potentially developable.	The housing supply identified in the SHLAA is considered robust. The housing land supply position has been updated in the Housing Need and Supply Background Paper.
		The Council will fail to meet the needs of the Borough as it is placing too heavy a reliance on windfall sites.	As evidenced in the SHLAA (2017) St Helens has a strong record of delivering a substantial number of dwellings on windfall sites below the threshold of 0.25 ha, this delivery has taken place under varying economic conditions and does not follow a trend. Therefore, it is considered reasonable that small sites will continue to be delivered in the Borough throughout the LPSD period and therefore an allowance for windfall development on small sites should be included in the housing supply.
		The strategy for allocating sites must be rethought with greater emphasis on the identification and allocation of larger sites in higher value market areas in order to ensure that the required level of market and affordable housing will be delivered. Peel considers that a reduction in the reliance on small and medium sites from 26% of the requirement to 15% would be appropriate, equating to 1,385 units against the LPSD requirement. If the LPSD housing requirement remained at 9,234, this reduction would mean a requirement to identify additional large sites to deliver 1,070 units.	The housing supply in the Plan and the supporting SHLAA is developable and offers a mix of sites in accordance with the requirements of NPPF Paragraphs 67 and 68.
		Peel's proposed site at Haydock Green presents a sustainable residential development opportunity, the allocation of which would address a number of deficiencies identified in the Plan, particular regarding the spatial distribution of residential development, the need for more effective co-location of residential and employment land and the quantitative under allocation of housing land. The site would	The Council can meet its needs for housing development up to 2035 and beyond elsewhere within the Borough without Haydock Green being allocated or safeguarded for development. The reasons why specific sites are not considered suitable for allocation or safeguarding are set out in the St Helens GBR (2018).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		realise significant highways and transport benefits in delivering part of the desired improvement works to Junction 23 of the M6.	
		Raises a number of concerns about the Plan's housing land supply (Table 4.6) and the lack of detail provided in the housing trajectory (Table 4.7). There is a need to allocate more sites to meet development needs.	The housing supply in the Plan and the supporting SHLAA is developable and offers a mix of sites in accordance with the requirements of NPPF Paragraphs 67 and 68.
		No evidence has been provided as to why a 75% net developable area has been used for the allocated sites. Densities differ between sites with no justification. The site profiles highlight a range of issues that will reduce the net developable area on some sites which makes it imperative that the Council considers additional sites for allocation.	<p>The site capacities stated are indicative. A 75% net developable area was incorporated in order to provide supporting infrastructure such as access roads or public open space. The amount of land needed for this will vary depending on the size of the site, as larger sites will usually have to provide a greater number of access roads and public open space to make them acceptable in planning terms.</p> <p>This aligns with both the SHLAA and the assumptions made in the EVA.</p>
		Policy fails to have any regard to the BFPAAP. Site 4HA will take decades to complete, with different developers submitting applications at different times and no-one controlling the master plan. The Plan encourages a chaotic development leading to urban sprawl. The Policy fails to outline how the years of disruption will be dealt with for the Bold Forest Park. Development at both sites (4HA & 5HA) should comply with policies in the BFPAAP as well as the Plan. The allocation of sites 4HA & 5HA are in direct conflict with policies contained in the BFPAAP.	<p>The site profiles for both Sites 4HA & 5HA clearly states that development must be consistent with the vision, aims and objectives and policies of the BFPAAP.</p> <p>The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.</p> <p>They also specify that both sites will be subject to a Masterplan with specifics of what each masterplan should include.</p>
		There is a concern that should there be any delays and a slower build out rate than expected the Housing Delivery Test will fail.	Comment noted. Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary. If it is clear that the

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			Housing Delivery Test is failing then the Council will look to address this situation, which could be an update of the Plan.
		Sites could result in piecemeal development as infrastructure is not known on multiple ownership sites. Any financial contributions will need to be proportionate. It is imperative that all likely costs associated with the delivery of strategic sites are fully considered.	It is the Council's intention to enter into an equality agreement, with all owners of larger sites in multiple ownership.
		Regarding site 4HA Warrington Council comment that there are potentially significant highways and environmental impacts for Warrington residents, arising from this development. There will also be the need to identify measures for sustainable access to connect the potential Garden Suburb by public transport, walking and cycling to the employment opportunities at Omega.	<p>Comments noted. An additional modification has been proposed to ensure sustainable methods of transport are incorporated within any master planning of the site. In addition, the master plan must also be informed by the findings of the Bold Forest Garden Suburb Transport Review (August 2019) and any other relevant evidence.</p> <p>Warrington Borough Council will be consulted throughout the master planning process.</p> <p>MODIFICATION No. AM074</p>
		The Plan is unsound because it fails to allocate enough housing sites to meet emerging development requirements. More sites must be allocated in order for the Plan to be sound.	The housing supply in the Plan and the supporting SHLAA is developable and offers a mix of sites in accordance with the requirements of NPPF Paragraphs 67 and 68.
		Extra housing is not sustainable as employment in the town is reducing. Latest housing need forecasts (ONS 2016) could be accommodated by cleaned up brownfield sites. The Plan would be better served by town centre development with high densities thereby reducing car dependency from outskirts.	The Plan's housing and employment allocations have been through vigorous SA's and Strategic Environmental Assessments to address any social, economic and environmental impacts from the development. Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that " <i>high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth</i> ".

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		The Council in conjunction with LCR and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15year plan period or the 25year safeguarded period being considered.	<p>The Brownfield Register will be updated annually. Paragraph 3 of Policy LPA02 reaffirms that development on previously developed land in Key Settlements will still remain a priority for the Council. The LPSD continues the Council's long-standing commitment to promoting urban regeneration and the re-development of brownfield sites in the Borough's urban areas.</p> <p>However, paragraph 67 of the NPPF clearly states that strategic policy making authorities must identify a supply of '<i>specific, deliverable sites for years one to five of the plan period</i>'. As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing land needs.</p>
		The Plan is over-reliant on sites for which deliverability may not have been fully assessed. It is considered that additional greenfield site allocations are required to increase the supply of housing land during the Plan period. This will provide flexibility in the event that "any urban capacity sites fail to deliver ... or are subject to lengthy delay".	The approach to housing land supply is explained in the supporting text of Policy LPA05, which contains an appropriate level of contingency in the supply as a whole, including sites being delivered from the current urban areas and from areas released from the Green Belt.
		The proposed allocations will not meet adequately the needs of Haydock, especially in the short to medium term. By seeking to meet all its needs in one large allocation of 400 dwellings Haydock's needs will not be met, especially given the need for a comprehensive master plan. Large allocations are notoriously slow in their delivery and at least one additional housing allocation is needed to meet the immediate needs of Haydock.	The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are in sustainable locations and those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs. Whilst the Plan focusses development towards key settlements including Haydock there is no requirement for each settlement to take a proportionate share of housing provision.
		The Council should consider allocating Parr Street, St Helens (Brownfield site BR016) in order to unlock government land to provide for new homes.	The site is considered too small an area to be allocated within the Plan. The site, however, is still entered on the Brownfield Register (ref: BR016).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		Disappointed that former site HS06 has been removed as a safeguarded site and retained as Green Belt. This site would make a logical extension to their Whittle Chase development.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).
		Disappointed that site 2HS has been safeguarded rather than allocated. Given its high standing in the settlement hierarchy, a higher proportion of development should be directed towards Newton-le-Willows.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to safeguard rather than allocate for this Plan period. The reasons for this are set out in further detail in the GBR (2018).
		Site 7HS should be an allocated site rather than a safeguarded site. Alternatives have not properly been considered and the Plan is not clear and consistent in its selection of sites for allocation. Site 7HS is the only site identified for under 100 units, which meets the small/medium sized sites definition, which should be prioritised through the Plan.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to safeguard rather than allocate for this Plan period. The reasons for this are set out in further detail in the GBR (2018).
		Based on the housing numbers being too low, site 8HS should be allocated rather than safeguarded.	Comments noted. The site delivery estimates and the Objectively Assessed Need have been updated and are considered robust.
		There needs to be an increase to the number of dwellings allocated in the Local Plan. Consequently, allocating site 1HS to be delivered within this plan period will help make the plan sound.	Comments noted. The site delivery estimates and the Objectively Assessed Need have been updated and are considered robust.
		The exclusion of Green Belt Parcel GBP-006c is not well founded as the land is a strong candidate for removal from the Green Belt and allocation for housing. GBP_006c is a more sustainable option for housing growth in Rainford than site 8HA.	This site was re-appraised in accordance with the GBR (2018) and suitable highway access and egress cannot be made. The reasons for this are set out in further detail in the GBR (2018).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		LPPO site HS11 should be allocated for housing as it would provide an element of affordable housing. It is well located in relation to shops, community services and facilities, with good public transport.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).
		Green Belt parcel GBP_48 is a suitable site to be released for development from the Green Belt; both as a sustainable location for development and by virtue of its failure to contribute meaningfully to the function and purpose of the Green Belt.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).
		Sites 1HA, 4HA and 8HA should be omitted from the Plan as these sites play an important role in the purposes of Green Belt, and site GBP_078 should be allocated.	As set out in the GBR (2018) there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs, and therefore some Green Belt release is required. Site GBP_078 was re-appraised in accordance with the GBR (2018) and as a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the site is now to be retained in the Green Belt. The GBR (2018) provides evidence and justification as to why sites 1HA, 4HA and 8HA are proposed for allocation whilst site GBP_078 is proposed to be retained in the Green Belt.
		Insufficient allocations have been identified to meet the housing need. Additional sites comprising of former LPPO sites HA14 & HS01, and 5HS should be allocated as they represent logical allocations capable of delivering sustainable development to meet the identified shortfall in housing land.	Comments noted. The site delivery estimates and the Objectively Assessed Need have been updated and are considered robust. The sites have been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to keep former LPPO sites HS01 and HA14 in the Green Belt and

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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			retain 5HS as a safeguarded site. The reasons for this are set out in further detail in the GBR (2018).
		Objects to omission of part of GBP_093, on various grounds including no-longer meeting the Green Belt purposes, 5year housing supply shortage and insufficient housing sites.	This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).
		Supports re-instatement of Green Belt between A580 and Prescot and in particular the retention of former LPPO sites HS08 and HS09.	Support noted.
		The allocation of this site (northern section of GBP_033) will bridge some of the shortcomings in the housing land supply resulting from over-optimistic yield figures.	Although, this area of GBP_033 has not been identified as a specific site allocation within the LPSD, this area of land will be removed from the Green Belt as a consequential change (Ref: CC14 in the GBR (2018)) following the adoption of the plan. The reasons for this are set out in further detail in the GBR (2018).
		Regarding parcel GBP_019_B the reduction in housing numbers conflicts with the previous agenda of economic growth. The reduced amounts of safeguarded sites may require a further GBR (2018) sooner than anticipated. Allocation of the site offers a supply in the short and medium term.	The NPPF expects local authorities to follow the standard method when assessing local housing need. The LPSD housing requirement of 486 dpa is exceeding the need established using the standard method. The LPSD seeks to align economic / jobs growth in the Borough with the appropriate provision of housing. The proposed housing requirement is an economic led figure which exceeds the standard method, and as such, in accordance with the PPG, should be assumed to be sound.
		Objects to omission of brownfield / vacant land at Peasley Cross (1.82ha) for residential development. The site was previously allocated for residential development in the Core Strategy and identified within the 2017 SHLAA. The site is partly within a Flood Zone 3 but has a potential yield of 12 units. Since acquisition in 2016	The site is too small of an area to be allocated within the Plan. The site is still allocated within the SHLAA (ref: 89) and the Brownfield Register (ref: BR031).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>the land has been subject of considerable work relating to flood risk, drainage, ground conditions and ecology and it is considered that the site now has potential for 35 units.</p> <p><u>Please see sections below on individual allocated sites for more specific comments made by local residents, developers/landowners and statutory consultees.</u></p>	
Site 1HA (see also section Site 1HS)	The main objections / issues raised by local residents in relation to this site have been addressed under Policy LPA05, and General Comments.		
	RO0016, RO0058, RO0059, RO0077, RO0079, RO0080, RO0081, RO0087, RO0089, RO0096, RO0108, RO0113, RO0135, RO0137, RO0139, RO0140, RO0145, RO0156, RO0157, RO0161, RO0184, RO0189, RO0236, RO0237, RO0299, RO0312, RO0316, RO0317, RO0329, RO0334, RO0335, RO0337, RO0338, RO0339, RO0340, RO0341, RO0342, RO0365, RO0383, RO0401, RO0403, RO0404, RO0408, RO0415, RO0421, RO0433, RO0443, RO0444, RO0460, RO0464, RO0477, RO0483, RO0484, RO0487, RO0506, RO0507, RO0516, RO0521, RO0594, RO0595, RO0617, RO0627, RO0630, RO0649, RO0651, RO0652, RO0656, RO0657, RO0664, RO0669, RO0680, RO0681, RO0700, RO0717, RO0720, RO0729, RO0749, RO0762, RO0768, RO0769, RO0781, RO0786, RO0796, RO0810, RO0811, RO0812, RO0814, RO0817, RO0818, RO0858, RO0869, RO0870, RO0906, RO0908, RO0909, RO0924, RO0932, RO0938, RO0939, RO0944, RO0945, RO0952, RO0963, RO0972, RO0973, RO0976, RO1003, RO1007, RO1008, RO1030, RO1032, RO1073, RO1079, RO1080, RO1089, RO1090, RO1091, RO1092, RO1111, RO1112, RO1145, RO1155, RO1186, RO1187, RO1198, RO1201, RO1203, RO1204, RO1219, RO1234, RO1235, RO1245, RO1246, RO1259, RO1300, RO1313, RO1321, RO1322, RO1323, RO1324, RO1324, RO1327, RO1333, RO1334, RO1335, RO1336, RO1341, RO1370, RO1371, RO1373, RO1375, RO1380, RO1383, RO1390, RO1391, RO1404, RO1405, RO1406, RO1407, RO1415, RO1417, RO1418, RO1423, RO1424, RO1425, RO1426, RO1427, RO1431, RO1432, RO1433, RO1434, RO1442, RO1447, RO1448, RO1453, RO1460, RO1461, RO1462, RO1463, RO1479, RO1480, RO1485, RO1491, RO1503, RO1506, RO1518, RO1522, RO1523, RO1524, RO1536, RO1560, RO1561, RO1563, RO1569, RO1581, RO1582, RO1583, RO1606, RO1610, RO1611, RO1615, RO1626, RO1627, RO1629, RO1638, RO1652, RO1678, RO1679, RO1681, RO1682, RO1735, RO1737, RO1738, RO1745, RO1751, RO1752, RO1753, RO1757, RO1759, RO1794, RO1795, RO1813, RO1817, RO1818, RO1829, RO1845, RO1846, RO1847, RO1857, RO1867, RO1868, RO1869, RO1875, RO1878, RO1882, RO1890, RO1892, RO1893, RO1894, RO1895, RO1897, RO1898, RO1905, RO1906, RO1916, RO1933, RO1934, RO1935, RO1953		
		Developer supports the removal of this site from the Green Belt for its proposed housing allocation; and the strategy of delivering more housing in Garswood (as the settlement can accommodate further growth). This proposed housing allocation forms a natural extension to Garswood.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		The designations of 1HA and 1HS will increase the size of Garswood by a third, which is excessive.	<p>Housing and employment sites have been identified by assessing a number of factors including the contribution that sites make to the purposes of the Green Belt, accessibility by sustainable modes of transport and other deliverability issues.</p> <p>The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are identified for development are those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.</p>
Site 2HA	The main objections / issues raised by local residents in relation to this site have been addressed under Policy LPA05, and General Comments.		
	RO0023, RO0037, RO0076, RO0078, RO0085, RO0120, RO0121, RO0122, RO0129, RO0142, RO0160, RO0187, RO0188, RO0192, RO0193, RO0200, RO0208, RO0215, RO0219, RO0236, RO0237, RO0240, RO0241, RO0249, RO0262, RO0263, RO0275, RO0318, RO0319, RO0320, RO0329, RO0331, RO0367, RO0402, RO0406, RO0407, RO0417, RO0418, RO0428, RO0429, RO0442, RO0443, RO0462, RO0478, RO0479, RO0486, RO0487, RO0489, RO0490, RO0492, RO0493, RO0507, RO0524, RO0533, RO0534, RO0544, RO0549, RO0613, RO0689, RO0690, RO0728, RO0741, RO0742, RO0746, RO0747, RO0748, RO0756, RO0791, RO0792, RO0793, RO0794, RO0813, RO0817, RO0818, RO0836, RO0837, RO0838, RO0839, RO0840, RO0844, RO0861, RO0894, RO0921, RO0940, RO0943, RO0967, RO0968, RO1010, RO1011, RO1041, RO1042, RO1062, RO1117, RO1118, RO1119, RO1127, RO1128, RO1143, RO1144, RO1146, RO1157, RO1182, RO1183, RO1198, RO1240, RO1247, RO1259, RO1268, RO1294, RO1305, RO1308, RO1321, RO1322, RO1323, RO1324, RO1342, RO1369, RO1372, RO1375, RO1396, RO1404, RO1405, RO1406, RO1407, RO1411, RO1412, RO1417, RO1443, RO1466, RO1468, RO1469, RO1488, RO1489, RO1511, RO1517, RO1571, RO1572, RO1579, RO1580, RO1595, RO1622, RO1629, RO1639, RO1640, RO1641, RO1642, RO1701, RO1702, RO1722, RO1747, RO1751, RO1752, RO1753, RO1755, RO1756, RO1784, RO1788, RO1794, RO1808, RO1826, RO1831, RO1878, RO1887, RO1911, RO1912, RO1932, RO1939, RO1944		
		Developer supports this allocation. It is considered suitable for Green Belt release as it forms a natural extension to the settlement of Haydock. The A580 forms a distinctive boundary between the site and open countryside and as such its development for residential use is sustainable in accordance with the NPPF. However, suggest the potential number of units on site can be significantly higher.	The site capacity stated in the LPSD (522 dwellings) is indicative. It takes account of the need to incorporate a significant noise buffer from the A580; provision of effective flood management measures for the site, appropriate open space provision and pedestrian and cycle provision. Please see Appendix 5 for more details.
Site 3HA	RO0054, RO0060, RO0295, RO0723,	Support the inclusion of this brownfield site.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0816, RO0828, RO1278, RO1529, RO1530, RO1838, RO1903, RO1904, RO1991	Traffic is an issue in this area and development of the site will only add to this more.	Comment noted. The site now benefits from planning consent (Ref: P/2015/0130) and a number of units have been built. Issues relating to highways would have been considered at that planning application stage.
Site 4HA	RO0054, RO0060, RO0136, RO0185, RO0186, RO0278, RO0295, RO0301, RO0363, RO0364, RO0375, RO0440, RO0441, RO0501, RO0505, RO0505, RO0599, RO0600, RO0638, RO0641, RO0660, RO0674, RO0675, RO0676, RO0723, RO0785, RO0815, RO0816, RO0828, RO0867, RO0875, RO0917, RO1018, RO1027, RO1029, RO1107, RO1108, RO1154, RO1196, RO1216, RO1244, RO1271, RO1326, RO1340, RO1367, RO1400, RO1464, RO1529, RO1530, RO1573, RO1629, RO1667, RO1668, RO1719, RO1720, RO1838, RO1903, RO1904, RO1938, RO1974, RO1977, RO1991	Knowsley Council raised no objections to the Plan, as this site is the nearest to our boundary with them and as less than 500 dwellings are anticipated to come forward within this Plan period, it is not considered that this Plan will have any direct competition or impact on Knowsley's strategic housing sites.	Knowsley Council's comments are noted and welcomed.
		Supports the proposed allocation of site 4HA Bold Forest Garden Suburb: it provides a positively prepared plan that meets the area's housing needs; it is justified as a highly appropriate Garden Suburb in this location; and, it is consistent with National Policy in delivering sustainable development.	Support noted.
		All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity.	It is the Council's intention to enter into an equality agreement, with all owners of larger sites in multiple ownership.
		Developer states that their element of site 4HA should be brought forward in terms of delivery given its siting adjacent to the existing settlement boundary.	Development will come forward once a comprehensive masterplan for the site as a whole has been agreed and complies with Policy LPA05.1 and other policies within the Plan.
		Many local residents state that the Council haven't met with our statutory duty and consulted with local residents on any stages of the Local Plan; and that paragraph 72 of the NPPF states that policy making authorities should work with the support of their communities and identify suitable locations where development can meet needs in	The preparation of the Local Plan has been informed by a process of continuous and ongoing consultation with the general public and other key stakeholders, both through formal consultation periods and through information and views gathered throughout the process. The process has followed the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 for preparing a

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>a sustainable way. They state the Council does not have this support and this level of development is not sustainable.</p> <p>There were a substantial number of representors who only submitted a Part A form, so did not specifically refer to any policies or matters contained in the LPSD, however they did state that they supported the views made by the Bold and Clock Face Action Group; whose comments can be summarised as follows:</p> <ol style="list-style-type: none"> 1. The allocation of this site is contrary to the policies and aims and objectives of the BFPAAP. Sites 4HA and 5HA will jeopardise the success of the Bold Forest Area Action Plan; 2. Development of this site will result in the loss of a large equestrian business; 3. The Plan fails to promote current employment sites in the Bold Forest Park; 4. Public Rights of Way and Bridleways will be lost due to development; 5. Local roads and major junctions will not be able to cope with such an increase in vehicles; 6. Concerned about the number of new homes and employment land planned for Bold Parish. The proposed developments will more than double the existing population; 7. Concerned of the level of community involvement with the Local Plan; and 8. Concerned over the impact new development will have on the existing infrastructure, with education facilities being 	<p>Local Plan, and also the St Helens Revised SCI, adopted November 2013.</p> <ol style="list-style-type: none"> 1. The distribution of sites to be removed from the Green Belt has been guided by the GBR (2018). The levels of development proposed in Bold are not inconsistent with the BFAAP. Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues. 2. Policy LPA04, paragraph 1, part 1d) supports the creation of and expansion of small businesses; 3. As above; 4. Public rights of way will need to be addressed in the master planning of the site; 5. Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements including transport network. In addition, the Council have commissioned a transport study (the Bold Forest Garden Suburb Transport Study), to identify the likely transport requirements to enable a residential led development being phased over 25 years; 6. Comments noted; 7. All residents within 200m of proposed allocated sites were written to directly to invite comments on the LPSD. Site notices, press releases and drop-in events were also carried out; and

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		already over-subscribed and health facilities at breaking point.	8. The sites chosen for Green Belt release have been objectively assessed such that they: are adjacent to existing built-up areas; relate well to the key settlements so that the availability of local services and facilities is more likely; reflect the demand for additional housing in areas that are accessible to jobs; and result in sustainable development . Under the criteria set out in Policy LPA08 development proposals will be expected to include or contribute to the provision of new or improvement of existing infrastructure in order to meet needs arising from the proposed development, this may include direct provision or financial contributions secured by Section 106 contributions.
		The Bold and Clock Face Action Group conducted an assessment of the GBR (2018) and suggest that it is not justified to remove the land from the Green Belt as the rating of the land against the purposes of the Green Belt should have scored High+. Climate change and flood risk has been ignored. Removal of the land will amalgamate several settlements. Openness of the countryside, pollution and wildlife will be impacted. They raised concern regarding urban sprawl and countryside encroachment.	The proposed housing allocations are well-related to the existing built-up areas. Whilst some loss of agricultural land will occur, this is justified by other sustainability factors. The St Helens GBR (2018) sets out how the sites to be removed from the Green Belt have been selected. There is insufficient land in the Borough's urban areas (and in those of neighbouring districts) to provide for future development land needs and therefore some sites need to be removed from the Green Belt to accommodate new development. Policy LPA08 requires new development to be adequately served by infrastructure.
		Developing the site will take over approximately 20 years to complete and during that time it will disrupt the local roads with increased noise, dust and local residents having to put up with a building site, which in turn will have a detrimental impact on attracting visitors to the Bold Forest Park.	Comments noted.
		There are concerns regarding traffic, with roads already significantly congested, in poor state of repair and difficult to improve effectively,	Policy LPA07 addresses the issue of transport impacts from development. It states that " <i>all proposals for new development that would generate significant amounts of transport movement</i>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		with bottle necks, rat runs and slow abnormal loads using the Bold Industrial Estate.	<i>must be supported by a Transport Assessment or Transport Statement</i> . The Council have commissioned a transport study (the Bold Forest Garden Suburb Transport Study), to identify the likely transport requirements to enable a residential led development being phased over 25 years
		Development of this site would result in approximately 4984 new cars on the road. The NPPF states active travel should be encouraged around sustainable transport. The Plan has to have a robust evidence base promoting walking, cycling and public transport. The site was not mentioned in the TIA.	The Council have commissioned a transport study (the Bold Forest Garden Suburb Transport Study), to identify the likely transport requirements to enable a residential led development being phased over 25 years. Appendix 5 sets out the key requirements development of this site would have to adhere to. These include a choice of foot, bridleway, and cycle routes through the site to facilitate access between homes, workplaces, recreational facilities, and other key services in the area. These must where necessary be segregated to ensure safety and include new provision in line with Policy INF6 "Creating an Accessible Forest Park" of the BFPAAP.
		There is a lack of footpaths and cycling lanes in the area.	The masterplan for the site will look at connectivity and linkages throughout the site including the creation of new foot, bridleway and cycle routes.
		Traffic is forecasted to increase which will worsen junction 7 & 8 of the M62 and Sherdley roundabout, thus increasing congestion and emissions.	Policy LPA07 addresses the issue of transport impacts from development. It states that " <i>all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement</i> ". The Council have commissioned a transport study (the Bold Forest Garden Suburb Transport Study), to identify the likely transport requirements to enable a residential led development being phased over 25 years.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Existing facilities are not within walking distances, and those that are lie on 40mph roads, thus counter the NPPF legislation on sustainable transport.	It is envisaged that a site of this size would be able to accommodate a range of local facilities. Policies LPA05.1 and LPA07 set out detailed measures to achieve sustainable transport and active travel.
		The Parish Council would like to encourage more parents to walk their children, however safety and pollution is a real concern. This ward has some of the most deprived areas in the country. Childhood obesity is significantly above average and the Bold Forest Park offers invaluable access to free green spaces. The Parish Council are concerned that development of this site will restrict community access.	Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues and provide good levels of accessibility by walking and cycling.
		The Plan does not provide details on how the Greenway Network would continue to run through the site or how they will be funded and delivered.	Policies LPA09 and LPA04.1 will address the need for the development to be sympathetic to the green infrastructure in the area.
		Development of this site will compromise the bridleways and greater areas of green infrastructure will be reduced due to accommodate footpaths and other routes.	Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues and provide good levels of accessibility by walking and cycling.
		The policy makes no reference to the BFPAAP. It is essential that any development within the Bold Forest Park ensures a net gain to biodiversity. A review of the Mersey biobank should have been undertaken prior to the allocation of sites 4HA & 5HA. A significant number of protected species breed within these sites. Development of site 4HA will have a significant negative impact on the Bold Forest Park, resulting in a net loss, and compromise the performance of the BFPAAP.	It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.
		Development of this site represents 42% of the housing allocation within the whole Plan, which is a disproportionately amount of development in a rural area. Development should be better spread across St Helens. There will be a detrimental impact not just to the	Only 480 new dwellings are proposed to be constructed on this site within the Plan period. This equates to only 5% of the housing need for the Borough in this Plan period.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		local area but on areas just outside the Borough such as Burtonwood and Westbrook.	
		Development of this site would be contrary to the purposes of Green Belt as it would significantly reduce the existing separation of St Helens from Burtonwood and reduce the nature of this village.	The Council consider that a sufficient distance will still exist, separating this section of Bold with neighbouring village Burtonwood.
		Concerned that this site is not specifically labelled on the Key Diagram. As the biggest site for housing in the LPSD there should be a site-specific policy. The delivery numbers for the site are considered too low with no justification.	Comments noted. However, this is not considered necessary. The density requirements are a minimum and allow for some flexibility in specific circumstances.
		It is misleading that the Policy Map showing this site appears to show the adjacent buildings and the Local Wildlife Site as not being in the Green Belt.	There are various sections of land within this site, including residential development, a riding school, farmsteads, dismantled railway line and a Local Wildlife Site. As these areas are located in and adjacent to land recommended for removal from the Green Belt to accommodate new development, it is considered sensible to also remove these areas of land from Green Belt. If left in isolation they would create isolated pockets of Green Belt that would not serve any Green Belt purpose. The Local Wildlife Site would be protected by other policies.
		More information/detail should be provided within this Site Profile in Appendix 5.	Comments noted. Appendix 5 has been amended.
		This allocation will see an overall reduction of 12% of the Green Belt within the Bold Forest Park. The majority of the Green Belt that has been allocated lies in the northern area and as such is the most accessible, leaving the southern area the least accessible for people. The NPPF expects the Local Authority to positively plan to enhance the beneficial use of the land in the Green Belt, including opportunities to improve access and provide opportunities for outdoor sport and recreation.	Appendix 5 sets out more prescriptive requirements for this allocation, including providing a well landscaped setting including extensive green links through and around the site, and tree planting to reduce impact on the landscape and promote the objective of the BFPAAP to increase tree cover by 30% across the Bold Forest as a whole.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>The Plan's proposals for this site are contrary to the IPBES Global Assessment Summary for Policymakers (May 2019), which highlights the importance of maintaining soil integrity to combat climate change.</p>	<p>Policy LPD01 requires new development to minimise and mitigate to acceptable levels any effects that the development may have on a number of elements including soil; and to avoid loss of or damage to soils (except where clearly justified by wider public benefits) and minimise such loss or damage where this is shown to be unavoidable.</p>
		<p>Disagree with the anticipated build-out rate of this site, it is unrealistically low and unambitious approach, and does not advocate the Vision, Aims and Objectives, as it will be a good source of growth. The Garden Suburb also provides an opportunity to attract Government Funding although this funding is awarded on the basis of delivery.</p>	<p>The build out rate assumptions utilised in the trajectory are slightly lower than what some developers have indicated they expect to deliver on the proposed allocated sites. For this site (4HA) 60 units per annum has been assumed but given the size of the site this could be higher depending on how many housebuilders and sales centres are operational at one time. The Council have taken a slightly cautious approach to assumed build out rates, given the current market uncertainty surrounding the economic impact of COVID19, the supporting infrastructure required to deliver many of the sites and the fact that quite a lot of large former Green Belt sites will be coming to the market at the same time.</p> <p>Additionally, a lead in time of 7 years on adoption of the Plan for site 4HA has been assumed. This is to allow for a thorough masterplanning process and preparation of a site-specific SPD to be prepared.</p>
Site 5HA	RO0054, RO0060, RO0285, RO0286, RO0295, RO0363, RO0364, RO0441, RO0501, RO0599, RO0638, RO0641, RO0723, RO0816, RO0828, RO0867, RO0875, RO1108, RO1154, RO1154,	<p>Developer supports the allocation of this site as it no longer fulfils its Green Belt purpose, development would be sustainable, and there are no technical constraints to prevent development. A minor amendment is required for site 5HA as the area of land currently occupied by farm buildings fronting Gartons Lane, is now in the control of Taylor Wimpey, and should be included.</p>	<p>Comments noted. Although the site referred to is not shown within the proposed allocation it would be removed from the Green Belt as a consequential change. It is anticipated that this issue will be discussed further at EiP, the site could form part of the overall masterplan of the site, and the housing figures proposed are a minimum.</p>
		<p>The site does not include land that St Michaels and All Angels Church has recently confirmed to be its ownership, plus some</p>	<p>As above.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1230, RO1326, RO1340, RO1400, RO1464, RO1493, RO1529, RO1530, RO1629, RO1650, RO1683, RO1719, RO1720, RO1838, RO1903, RO1904, RO1991	presently held land in the existing rectory/church site, should be included in a modified housing plan.	
		The allocation of this site is contrary to the policies and aims and objectives of the BFPAAP.	The distribution of sites to be removed from the Green Belt has been guided by the GBR (2018). The levels of development proposed in Bold are not inconsistent with the BFPAAP.
		Development in Sutton Manor/Clock Face would have a detrimental effect on the plan for Bold Forest Park. The local area needs the Bold Forest Park to bring visitors and businesses to the area. Allowing residential or commercial development would put that in jeopardy and negate any of the benefits.	It is not considered necessary to reference the BFPAAP in every LP policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.
		This allocation will see an overall reduction of 12% of the Green Belt within the Bold Forest Park. The majority of the Green Belt that has been allocated lies in the northern area and as such is the most accessible, leaving the southern area the least accessible for people. The NPPF expects the Local Authority to positively plan to enhance the beneficial use of the land in the Green Belt, including opportunities to improve access and provide opportunities for outdoor sport and recreation.	Appendix 5 sets out more prescriptive requirements for this allocation, including providing a well landscaped setting inclusive of extensive green links through and around the site, and tree planting to reduce the impact on the landscape and promote the objective of the BFPAAP to increase tree cover by 30% across the Bold Forest as a whole.
		The Parish Council would like to encourage more parents to walk their children, however safety and pollution is a real concern. This ward has some of the most deprived areas in the country. Childhood obesity is significantly above average and the Bold Forest Park offers invaluable access to free green spaces. The Parish C are concerned that development of this site will restrict community access.	Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues and provide good levels of accessibility by walking and cycling.
		Development of this site would compromise the residential amenity of existing residents of the area; particularly with regard to loss of privacy and visual impact.	The layout, design and orientation of any development of this site will be set out at planning application stage. Policy LPC02 will address these issues.
		Traffic is already an issue in this area, further development will create further highway problems, leading to safety concerns and noise and	Policy LPA07 addresses the issue of transport impacts from development. It states that " <i>all proposals for new development</i>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		air quality issues, especially for those already suffering with respiratory or breathing illnesses.	<i>that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement</i> . Air pollution and noise are also covered in relevant Plan Policies LPD01 and LPD09.
		There is a large housing development proposed on nearby brownfield land (SHLAA site HL483), therefore a second large housing development is therefore not required in the area.	The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are in sustainable locations and those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
Site 6HA	RO0665, RO0914, RO0917, RO1350	Objects to the site due to its close proximity to existing working business, which operates a 24/7 business and houses compressed gases etc. and are concerned that new residential uses near their current site could impact their ability to continue to operate commercially. The allocation should therefore be reflective of the NPPF paragraph 182 and ensure that appropriate noise mitigation measures and buffer zone safeguards are set out within the LPSD Policy LPA05.1.	Site 6HA is a proposed strategic allocated site, and therefore any planning application submitted must be supported by a comprehensive masterplan, which covers the whole site, taking account of neighbouring uses and how it complies with other relevant policies in the Local Plan.
		Strongly support the allocation of 6HA. Support the Council in progressing the LPSD. However, the requirements set out in Appendix 5 are unsound, and should be amended. The indicative requirements should clearly facilitate a flexible, innovative approach to be taken to masterplanning and the subsequent development of the site. In particular the requirements relating to green infrastructure and employment land should be revised.	Comments noted. The site profiles are meant as a general point of reference and are not an exhaustive list. The requirements set out for each site are in addition to any others that are needed to comply with Plan policies, e.g. in relation to infrastructure provision.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Acknowledge the need to appropriately safeguard and enhance areas of biodiversity and wildlife value. However, significant reclamation works are required to stabilise the site and will impact areas previously identified as having wildlife value and green infrastructure will need to be integrated with approaches to screening the site from continuing industrial uses along its western edge.	Comment noted. Details regarding these issues will need to be submitted as part of any planning application and adhere to adopted policies.
		Welcome the requirements to provide the scope to use the employment area for housing if employment does not come forward. However, it is considered that reference should also be made to other appropriate commercial uses in this area consistent with new residential development.	Comment noted. However, it is not considered necessary to amend the class uses for this site.
		The allocation of this site would help create a major arterial road that creates better connections with the East Lancashire Road and the Town Centre and help alleviate other troubled spots on the highway network.	Comment noted.
		Support the master planning approach in this policy. The inherent flexibility in how 'indicative requirements will have to balance a range of design, ground conditions, infrastructure, environmental and viability issues. Similarly, the approach to open space will be considered at masterplanning stage, given its proximity to Victoria Park.	Support noted.
		The significant additional infrastructure and other works bringing forward brownfield sites such as 6HA should be explicitly reflected in LPA08 and LPC02, along with the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions. The Council do not consider it necessary to refer to specific sites within these policies. More prescribed requirements are set out in Appendix 5 under the relevant site profile.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		This site is understood to have a potential of more than 1,000 dwellings which could be built on this site; well above the 816 suggested in the Plan. The proposed density (35 dph) is potentially lower than the developer would wish for and certainly the 75% net developable area is below what any developer would propose for such a site. The cost of remediation of such a brownfield site would need a greater land usage and density in order to maximise the economic viability for the cost of remediation. It is also understood that a potential developer would want to complete the entire site within the 15year period of the proposed Plan, again due to economic viability. So, the Plan is unsound delivering only 516 dwellings at this site over its period as opposed to the probable 1,000+ dwellings which will happen over the Plan period.	The site capacity stated in the LPSD (816 dwellings) is indicative. It takes account of the need to incorporate a Green corridor, incorporating Local Wildlife Site (LWS47), along with adequate buffer zones along existing employment uses adjacent to the site. More requirements associated with this site are outlined in Appendix 5 of the LPSD.
Site 7HA	RO1788	Support the removal of 7HA & 13HA.	Sport England have yet to clarify their position regarding sites 7HA and 13HA, as there is no site 13HA and site 7HA is still proposed as an allocation and was formally referenced as HA13.
Site 8HA	RO0001, RO0002, RO0003, RO0015, RO0061, RO0063, RO0067, RO0073, RO0074, RO0086, RO0116, RO0132, RO0155, RO0191, RO0194, RO0227, RO0230, RO0238, RO0243, RO0253, RO0264, RO0265, RO0290, RO0290, RO0324, RO0333, RO0336, RO0356, RO0368, RO0376, RO0377, RO0378, RO0379, RO0395,	Supports the allocation of the site and understands the need to think about the needs of the village and although Green Belt and traffic are important issues they do not override the need to ensure Rainford remains a strong and vibrant community.	Support noted.
		Supports the inclusion of this site. The indicative capacity should be treated and expressed as a minimum figure to provide a degree of flexibility, in the event that it is possible to accommodate more dwellings on the site following a detailed masterplanning exercise, and having regard to other policy requirements in the Plan (i.e., density, open space).	Paragraph 3 of Policy LPA05 clearly states that the densities set out are a minimum. The policy is flexible and in line with national policy.
		Rainford Action Group welcomes the reduction in the number of sites and housing numbers proposed for Rainford in the LPSD. However,	1. The employment land needs are based on a robust methodology as set out in various reports, including the St Helens Employment Land and Premises Study 2015, the LCR SHELMA and the St Helens Employment Land Needs

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0399, RO0413, RO0416, RO0420, RO0459, RO0463, RO0476, RO0485, RO0556, RO0557, RO0558, RO0561, RO0591, RO0592, RO0606, RO0607, RO0608, RO0609, RO0610, RO0611, RO0611, RO0658, RO0659, RO0709, RO0710, RO0730, RO0736, RO0758, RO0760, RO0782, RO0783, RO0784, RO0787, RO0788, RO0795, RO0801, RO0862, RO0863, RO0864, RO0871, RO0883, RO0885, RO0889, RO0890, RO0891, RO0931, RO0933, RO0936, RO0937, RO0941, RO0942, RO0970, RO0971, RO0977, RO0989, RO0990, RO1009, RO1012, RO1013, RO1019, RO1024, RO1025, RO1026, RO1037, RO1039, RO1067, RO1078, RO1104, RO1109, RO1130, RO1131, RO1165, RO1171, RO1172, RO1173, RO1174,	<p>the action group and local residents still have a number of objections to the allocation, which include:</p> <ol style="list-style-type: none"> 1. The economic analysis is flawed and based on over-optimistic assumptions. The level of land needed for housing and employment is therefore not as high as set out in the Plan; 2. There are no exceptional circumstances to change Green Belt boundaries. 3. There has been a failure to cooperate with other councils and have not published any statement of common ground; 4. Traffic and congestion already a serious issue for the residents of Rainford. The site is adjacent to two accident black spots on Mill Lane, and further traffic will have a detrimental impact on pedestrians and cyclists. Additional traffic generated by the development will cause capacity issues and increase pollution. The site is reasonably well served by bus, but poorly served by rail with the nearest train station located in Rainford Junction over 2 miles away with minimal parking facilities.; 5. The SA's own assessment of this site concludes it is the least appropriate Green Belt site to be allocated; 6. The site is next to an industrial area and subject to the risks associated with industrial activity such as pollution and explosions; 7. Natural England has not been consulted; 8. Existing health and education facilities are already at full capacity, with no dentist in the village; 9. The site allocation would be contrary to Policy LPA02; 10. The site fulfils its Green Belt purpose and prevents urban sprawl and preserve the open countryside around Rainford; 11. Affordable homes are only likely were the housing density can be increased. 	<p>Assessment Update 2018. More information is contained in the Employment Background Paper, which forms part of the suite of submission documents;</p> <ol style="list-style-type: none"> 2. There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt; 3. In terms of Duty to Cooperate, this is set out in the 2018 AMR and will be regularly monitored in future AMR's. A Duty to Cooperate Statement has also been produced and a Statement of Common Ground has been agreed and signed with the LCR. Both of which form part of the suite of submission documents; 4. Policy LPA07 addresses transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA08 and LPA10; 5. The SA is a systematic process, to help promote sustainable development and not a definitive tool to determine precisely where development should and should not take place, as there may be other factors to consider; 6. Both national policy and Policy LPD02 requires new housing developments to achieve high standards of design and environmental sustainability, and provide a good standard of amenity for all existing and future occupants and those of neighbouring land and buildings; 7. Natural England is a statutory consultee and have been consulted at every stage of the Plan's preparation; 8. Policy LPA08 requires new development to be adequately served by infrastructure; 9. The Plan promotes the reuse of brownfield land in key sustainable locations. However, the existing urban area does not include sufficient sites of the quantum and type

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1185, RO1189, RO1190, RO1193, RO1194, RO1233, RO1239, RO1244, RO1254, RO1265, RO1272, RO1292, RO1301, RO1303, RO1304, RO1306, RO1314, RO1325, RO1419, RO1436, RO1437, RO1440, RO1441, RO1459, RO1478, RO1492, RO1498, RO1502, RO1504, RO1512, RO1516, RO1519, RO1554, RO1591, RO1592, RO1593, RO1596, RO1597, RO1616, RO1625, RO1629, RO1635, RO1657, RO1658, RO1659, RO1660, RO1661, RO1663, RO1664, RO1665, RO1670, RO1674, RO1680, RO1692, RO1693, RO1694, RO1703, RO1725, RO1770, RO1783, RO1790, RO1799, RO1800, RO1820, RO1821, RO1824, RO1828, RO1839, RO1849, RO1853, RO1854, RO1891, RO1907, RO1908, RO1918, RO1919, RO1920, RO1921,		<p>required to meet employment and housing development needs;</p> <p>10. The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt;</p> <p>11. Policies LPC01 and Policy LPC02 set out the policy framework to deliver a suitable housing mix including affordable housing.</p>
		Given the ageing population of Rainford, any development should have a high percentage of homes for life i.e. bungalows with consideration given to disabled access. Local occupancy restrictions should be stated within planning applications to ensure local residents move from family house onto a bungalow.	<p>Comment noted. However, it would be unreasonable and unsound to submit such occupancy restrictions on development sites in this location or elsewhere in the Borough.</p> <p>Policy LPC01 refers to housing mix and states that at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows. It also makes reference to the provision of accessible and adaptable dwellings and an additional requirement for 5% of new dwellings to be provided for wheelchair uses.</p>
		Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land, for example, SHLAA 2016 sites 16 and 142.	SHLAA sites 16 and 142 are both located within the Town Centre with no possibility of appropriate buffers from potential noise pollution.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1922, RO1923, RO1961, RO1971		
Site 9HA	RO0118, RO0244	Support the allocation.	Support noted.
		An unofficial footpath will be lost as part of the new housing development. Apart from the local park there is very little access to open space in the area.	Connectivity and linkages throughout the site will be encouraged and addressed at planning application stage.
Site 10HA	RO1948	Supports the sustainable regeneration and growth of the borough including the allocation of 10HA.	Support noted.
		Support the site's allocation for residential development in the Local Plan. Redevelopment of the site presents an opportunity to make positive use of an underutilised brownfield site. Although, it is evident that the land to the north of Sutton Brook and land to the east of Watery Lane forms a critical element of the wider masterplan for Moss Nook Urban Village and as such the boundaries for Site Ref. 10HA should be amended to reflect the wider, more comprehensive development area.	Comments noted. However, the Council consider the boundary as shown on the Policies Map is sufficient and does not need to be amended.
		Object to the allocation of this site as it includes land that is defined as playing fields and would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. Whilst the Council may have plans to relocate the facilities this has not been clarified in the policy and no replacement sites have been identified. The loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF. Consequently, at this stage, Sport England would object to the potential allocation of this site for residential unless (in accordance with Government policy).	Site 10HA has an extant planning consent (Ref: P/2003/1574) with agreed and suitable replacement pitches and associated changing rooms and car-parking to the north of the site. Furthermore, the site profile in Appendix 5 clearly states that appropriate provision of open space must be included in accordance with Policies LPC05 and LPD03, and that any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		The policy seeks to restrict the density of residential development, based on the location of a development site within the Borough, we do not support this given that the suitable density for development will depend on many characteristics of a development site and its surrounding area.	Comment noted. The density requirements in Policy LPA05 are minima but allow some flexibility in specific circumstances.
Table 4.5	RO0225, RO0333, RO0420, RO0486, RO0638, RO0676, RO0788, RO0935, RO0971, RO0977, RO1145, RO1230, RO1350, RO1498, RO1635, RO1944, RO1952, RO1953, RO1958	Table 4.5 identifies an indicative site capacity for site 2HA. Based on the work and information Barratt Homes has submitted, this number should be increased to 600 units. Increasing the yield on this site will also reduce the pressure on the delivery of brownfield sites and 'boost' the housing supply in St Helens.	The site capacity stated in the LPSD (522 dwellings) is indicative. It takes account of the need to incorporate a significant noise buffer from the A580; provision of effective flood management measures for the site, appropriate open space provision and pedestrian and cycle provision. Please see Appendix 5 for more details.
		Sites 1HA, 4HA and 8HA should be omitted from the Plan as these sites play an important role in the purposes of Green Belt, and site GBP_078 should be allocated.	The reasons for omitting site GBP_078 are set out in further detail in the GBR (2018).
		The Brownfield Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound.	The numbers referred to in Table 4.5 are expected yield numbers from the proposed allocated sites, 4,085 within this Plan period and 2,956 beyond the Plan period. Over the Plan period a total of 7,245 dwellings will be required (1 st April 2020 to 31 st March 2035), therefore the remaining 3,160 required dwellings will come via SHLAA and Brownfield Register sites. Some of the sites on the SHLAA (and Brownfield Register) are subject to physical and other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities.
		15% buffer for SHLAA non delivery seems a huge number. So, whatever the number here, they should be rolled over into the next period and included in the future plan numbers instead of Safeguarding more land.	Some of the SHLAA sites are subject to physical or other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities. An allowance of 15% for reduced delivery is therefore considered appropriate.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		<p>A non or stalled delivery of 20% should be applied to both SHLAA capacity and Green Belt sites. Applying a consistent allowance will require additional sites to be allocated or at least safeguarded for housing delivery.</p>	<p>To ensure that the net housing requirement is met in full, the LPSD applies a SHLAA capacity reduction for non-delivery of 15% (794 units) and a 20% buffer to the proposed Green Belt allocations (339) to allow for contingencies, e.g. infrastructure provision, delays, lead-in times etc.. In total, when allowing for the site specific capacity of sites to be allocated, the allocations actually provide an additional 361 units (slightly more than the 339 units required by the buffer) on proposed Green Belt sites than is actually required to meet the housing requirement; this equates to a 21% buffer and 5% of the total residual housing requirement.</p> <p>The 15% reduction to the SHLAA supply and the 21% buffer on Green Belt sites totals 1,155 units (2.4 years of supply). If a non-delivery reduction was not applied to the SHLAA, the overall housing supply in the Plan period would actually be 8,400 units (6,344 units in the SHLAA and 2,056 units on the Green Belt sites); this is 16% above the 7,245-residual requirement. Therefore, the Plan is already oversupplying, so there is no need to allocate further sites.</p>
		<p>The HBF are keen that the Council produces a Plan which can deliver against its housing requirement. The HBF also strongly recommends that the Plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery and is consistent with the NPPF. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.</p>	<p>See above.</p>
		<p>The SHLAA postdates the GBR (2018), and it is not clear why the Plan opts for 486 dwellings per annum given the higher requirement suggested by the recent SHMA. Against this background of unmet</p>	<p>The Government published draft proposals the effect of which were that housing need calculations should be based on the 2014 populations figures and not the 2016. Using the national standard method this would generate a housing need of 468 dpa. However, this does not consider the increase in</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		housing need, it is also not clear as to the planning justification for no longer proposing 3HS as an allocation.	employment growth, which leads to an increased housing need. The SHMA used more recently published household and population projections and whilst the scenarios in the SHMA indicate a range of annual housing needs figures, the 486 dpa was considered the most realistic scenario. Site 3HS scored lower than other sites in the GBR (2018). The GBR (2018) sets out in more details the reason for this.
Table 4.7 (p47)	RO0780, RO0149, RO1964	There is an assumption that most of the strategic housing sites will be developed within the Plan period. There is a requirement to monitor the progress of housing delivery to ensure that in the previous 3 years the delivery had not fallen below 95%, there is a concern that should there be any delays and a slower build out rate than expected this would result in failing the Housing Delivery Test.	Comments noted, should this happen the Council will prepare an action plan to address the causes of under-delivery.
		There is a lack of detail provided in the housing trajectory table. An in-depth breakdown of annual delivery rates expected on individual housing sites should be provided. As such, more sites need to be allocated to meet development needs.	The Council do not consider that further sites need to be allocated to meet development needs.
		Given the extent to which the Plan's housing supply is predicated on larger housing allocations coming forward, it is expected that the Plan would provide an updated schedule of sites proposed to be allocated, including evidence of when it is anticipated that those sites would commence delivery and what assumptions have been made with regard to the phasing and delivery rates.	Further details regarding delivery of the Local Plan's housing requirement is set out in the Housing Need and Supply Background Paper. It provides specifics on housing delivery, supply and includes an updated trajectory.
		Raises a number of concerns about the Plan's housing land supply (Table 4.6) and the lack of detail provided in the housing trajectory (Table 4.7). This leads to a need to allocate more sites to meet development needs.	As above.
		2955 new homes in Bold equates to 6 years housing supply beyond 2035. If a housing need of 298 dpa beyond 2035 is adopted from Table 4.7 then the allocated housing supply period extends to just	When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		short of 10 years. As such both of these analyses show that the 5 Year Housing Supply is met without the need for safeguarding at all. Small/windfall sites will further influence housing need beyond 2035 as well as a reduction on the annual housing need. Therefore, without the safeguarded sites, there will be a buffer between 8-13 years of housing supply.	can endure beyond the plan period. NPPF Paragraph 139 instead requires that when amending Green Belt boundaries Plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". Therefore, the Council took the positive step to allocate sufficient land for not just this Plan period, but the following too.
		The Plan should provide an updated schedule of sites proposed to be allocated, including evidence of when it is anticipated that those sites would commence delivery and what assumptions have been made with regard to the phasing and delivery rates.	The Council does not consider this to be necessary, as Table 4.7 and Figure 4.3, clearly show the anticipated housing trajectory, whilst Table 4.5 clearly sets out the anticipated build out rates and assumptions.
		It is unclear where the data relating to "other supply" has been derived. The Plan should provide clarity on how the other supply has been calculated.	Other supply includes SHLAA sites, Brownfield Register sites and windfall sites. MODIFICATION No. AM031
Policy LPA05.1: Strategic Housing Sites	RO0012, RO0013, RO0014, RO0017, RO0066, RO0118, RO0159, RO0235, RO0244, RO0281, RO0282, RO0328, RO0366, RO0375, RO0568, RO0574, RO0604, RO0626, RO0628, RO0665, RO0816, RO0872, RO0875, RO0904, RO0917, RO0950, RO0951, RO1076, RO1093, RO1114,	Strongly support the allocation of 2HA. It is considered suitable for Green Belt release as it forms a natural extension to the settlement of Haydock. The A580 forms a distinctive boundary between the site and open countryside and as such its development for residential use is sustainable in accordance with the NPPF.	Support noted.
		Welcomes the inclusion of 4HA in the list of Strategic Sites. Supports the proposed allocation of site 4HA Bold Forest Garden Suburb: it provides a positively prepared plan that meets the area's housing needs; it is justified as a highly appropriate Garden Suburb in this location; and, it is consistent with the NPPF.	Support noted.
		Supports the designation of 9HA.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1145, RO1152, RO1154, RO1164, RO1369, RO1470, RO1471, RO1472, RO1473, RO1474, RO1495, RO1540, RO1541, RO1542, RO1620, RO1761, RO1788, RO1852, RO1944, RO1948, RO1953, RO1958, RO1960, RO1967, RO1968	Support the allocation for residential development of 10HA. However, considers the site should be extended and cover the boundary as set out in extant planning consent P/2011/0058 (54.19ha), as it is evident that the land to the north of Sutton Brook and land to the east of Watery Lane forms a critical element of the wider masterplan for Moss Nook Urban Village and as such the boundaries for Site Ref. 10HA should be amended to reflect the wider, more comprehensive development area.	Comments noted. However, the Council consider the boundary as shown on the Policies Map is sufficient and does not need to be amended.
		Supports the Plan's approach to housing allocations, including a separate policy for those allocations considered to be strategic in scale (300 homes upwards). It is considered appropriate that a range of sites are allocated in order to ensure a continuous and constant supply of homes throughout the Plan period. Sites that are not identified as strategic in scale (e.g. 1HA) are available to make a significant contribution to the housing supply early in the Plan period and are less likely to be encumbered by: the requirement for significant additional supporting infrastructure; complicated land ownership patterns; or, disputes over land value equalisation.	Support and comment noted.
		The need for a comprehensive masterplan in paragraph 2 is supported. However, this must form part of the planning application process and must not unduly delay grant of planning permission or delivery of development on an allocated site.	Paragraph 2, clearly states that ' <i>Any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan</i> '.
		Paragraph 2, part 'h' is vague, and it is unclear what is meant by expanded or enhanced infrastructure?	Part 'h' simply refers to new, improved or increased infrastructure that maybe required as part of the proposed development. This could include new highway infrastructure or educational, health facilities.
		Paragraph 3 requires development proposals to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site.	There are occasions where large developments can have an impact on existing highway infrastructure that would as a consequence require enhancing and or improving. This paragraph makes provision for such a case.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		Policy LPA05.1 highlights the identification of other residential allocations in Policy LPA05 that are not large enough to be regarded as Strategic Housing Sites. Although those sites will yield smaller numbers of homes compared to strategic ones, their allocation will support the overall delivery of housing and will play a key part of the supply and balance out the phased delivery that will result from Strategic Housing Sites.	Comment noted.
		The Policy fails to have any regard to the BFPAAP.	It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.
		Concerned regarding those large sites which are in multiple ownership. The Council should make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework, and recommend the policy is amended.	It is the Council's intention to enter into an equality agreement, with all owners of larger sites in multiple ownership.
		The allocated sites are unlikely to deliver the stated site yields because of the need to allow for unique planning constraints (highways, design, green space, ecology, flood risk, landscaping).	The sites yield are considered moderate and a 75% NDA has been applied to most to take these unique planning constraints into account.
		The Plan needs to ensure that it has applied realistic assumptions around lead-in times and build-out rates for the allocations, especially given the level of infrastructure requirements associated with them. To maximise housing supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products.	Comment noted. The Council considers that this has been achieved.
		Concerned that a number of sites are expected to be delivered beyond the end of the Plan period. Any slippage will create a	Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary. Should there be any slippage then

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		housing shortfall which will jeopardise the vision and objectives of the Plan.	the Council will look to address the situation, which could involve an update of the Plan.
		Given the amount of existing commitments in the Plan's housing land supply, evidence is required to demonstrate that the sites selected are deliverable and can commence in the next five years. Opportunities to comment further on this issue should be made available at the Examination if further evidence has been made available.	Comment noted.
Policy LPA06: Safeguarded Land	RO0007, RO0012, RO0013, RO0014, RO0017, RO0018, RO0021, RO0022, RO0028, RO0035, RO0039, RO0040, RO0041, RO0053, RO0056, RO0058, RO0066, RO0073, RO0077, RO0079, RO0080, RO0081, RO0082, RO0087, RO0089, RO0090, RO0096, RO0098, RO0099, RO0100, RO0105, RO0107, RO0111, RO0113, RO0114, RO0115, RO0117, RO0119, RO0125, RO0126, RO0134, RO0136, RO0137, RO0138, RO0139, RO0140, RO0141, RO0142, RO0146, RO0154, RO0156, RO0157,	Supports the realisation that the development needs of the Borough cannot be met without releasing land currently in the Green Belt.	Support noted.
		Supports policy and the release of additional land from the Green Belt to meet housing and employment needs beyond the Plan period. The NPPF is clear that areas of safeguarded land should be identified to meet longer term development needs stretching beyond the Plan period. Regard should also be taken of the intended permanence of the Green Belt boundaries in the long term. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the NPPF.	Comments and support welcomed.
		The monitoring and review scenario are confusing. If the monitoring framework is to be credible then Policy LPA06 needs to be amended, clearly setting out under what circumstances the Council would grant planning permission on safeguarded land. Without clarity the policy is unsound and not justified.	The trigger (as set out in the Monitoring Framework) is 10% or more of safeguarded land granted planning permission. The target should be nought, however if consent has been given then obviously the housing need is not being met and as such an early review of the Plan will be considered. Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO0159, RO0161, RO0168, RO0169, RO0174, RO0184, RO0189, RO0195, RO0196, RO0197, RO0200, RO0201, RO0202, RO0205, RO0209, RO0215, RO0217, RO0218, RO0224, RO0225, RO0226, RO0228, RO0235, RO0236, RO0237, RO0239, RO0245, RO0250, RO0258, RO0259, RO0260, RO0261, RO0272, RO0273, RO0274, RO0279, RO0280, RO0281, RO0282, RO0283, RO0298, RO0300, RO0301, RO0306, RO0307, RO0308, RO0313, RO0314, RO0315, RO0316, RO0317, RO0320, RO0321, RO0322, RO0323, RO0329, RO0332, RO0334, RO0337, RO0338, RO0339, RO0340, RO0341, RO0342, RO0345, RO0349, RO0351, RO0352, RO0355, RO0357, RO0358, RO0365, RO0366, RO0372, RO0373, RO0375,		be granted following a future Local Plan review that proposes such development.
		Suggest that future safeguarded sites should be aligned to the conclusions from the SHELMA Part 2 study, which will in itself help to develop the case to satisfy the exceptional circumstances test required to justify any Green Belt release.	Comment noted. The policy is consistent in its approach and pays due regard to the SHELMA. The safeguarded sites proposed in the Plan are required to meet longer term development needs of the Borough beyond 2035.
		There is too strong a reliance on large-scale strategic sites and deliverability of sites is strongly questioned, therefore there is no-need to safeguard housing sites.	Comment noted.
		Knowsley Council are encouraged that no sites are proposed for allocation on or near to the boundary of Knowsley within this Plan period, and that issues/challenges that may arise in the future from site 3HS will be considered as part of any future Local Plan review.	Comment noted.
		The term "Safeguarded" when used in relation to land removed from Green Belt status is misleading and a misappropriation of the term. The land is in fact less "safe" from development than if it remained as Green Belt. Land for future development should be included clearly in the Plan or removed if it not to be used within this Plan period.	The term 'safeguarded land' is used in national policy for this specific purpose. Safeguarded land is not allocated for development in this Plan period. Planning permission for the permanent development of safeguarded land will only be granted following the adoption of an update to a Local Plan which proposes the development. This approach aligns with the NPPF.
		The amount of safeguarded land allocated is excessive and some of the proposed sites should be removed. It is difficult to forecast the future requirement for homes and more previously developed land could come forward in the future.	When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. NPPF Paragraph 139 instead requires that when amending Green Belt boundaries Plans should " <i>where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period</i> ". Therefore, the Council took the positive step

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0376, RO0377, RO0378, RO0379, RO0382, RO0383, RO0397, RO0400, RO0403, RO0405, RO0408, RO0409, RO0415, RO0421, RO0424, RO0425, RO0426, RO0427, RO0431, RO0432, RO0433, RO0443, RO0444, RO0446, RO0447, RO0448, RO0449, RO0450, RO0451, RO0452, RO0453, RO0454, RO0455, RO0456, RO0460, RO0464, RO0472, RO0473, RO0475, RO0477, RO0483, RO0484, RO0487, RO0488, RO0495, RO0498, RO0499, RO0502, RO0506, RO0507, RO0508, RO0510, RO0515, RO0516, RO0517, RO0518, RO0519, RO0521, RO0522, RO0523, RO0525, RO0531, RO0532, RO0542, RO0543, RO0551, RO0554, RO0555, RO0560, RO0562, RO0565, RO0566, RO0567, RO0568, RO0572, RO0575, RO0576, RO0581,		to allocate sufficient land for not just this Plan period, but the following too.
		Both the analyses of Tables 4.7 and 4.8 show that the 5 Year Housing Supply is met without the need for safeguard land. It is clear that without safeguarded sites, there will be a buffer totalling between 8, or as appears more likely given the reduced housing need, 13 years of housing land supply, more than enough to satisfy the 5 Year Housing Land Supply requirements. Put another way, between 53 and 87% of a 15-year plan period.	As above.
		The Council has not identified the scale of anticipated future need that safeguarded land should be capable of accommodating, which risks under-provision and the need to alter Green Belt boundaries at the end of the Plan period. This is exacerbated when one applies the upward adjustment to the employment land Objectively Assessed Need, and residual requirement Peel contends is necessary. The upward adjustment Peel consider necessary to the Objectively Assessed Need and the residual requirement, generates an equivalent need to accommodate 126.10ha for 10 years beyond the Plan period and 189.15 ha for 15 years beyond the Plan period, through safeguarded land for future employment development (compared to the 8.68 years/ 85.88 has in the LPSD). This would ensure the Council can demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period, in accordance with Paragraph 139 of the Framework.	There is no expectation in the NPPF that local authorities should set a precise land requirement for safeguarded land by way of a specific quantum of need (such as by Objectively Assessed Need as suggested in the representation). NPPF Paragraph 139 instead requires that when amending Green Belt boundaries Local Plans should " <i>where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period</i> ". It is considered through the safeguarding of 85.88ha (1ES and 2ES) for employment land use beyond 2035, the LPSD strikes a balance between preserving the Green Belt and the need to meet longer term development needs as required by the NPPF. In addition, it is possible that some of the LPSD employment allocations could still be being built out beyond the Plan period, as various factors may impact on take-up in the St Helens market over the Plan period. For example, you would expect there to be economic peaks and troughs during and beyond the Plan period. Therefore, there is some uncertainty as to the scale and nature of longer-term development needs.
		Supports the removal of land from Green Belt to be allocated as safeguarded land, but considers the extent of the safeguarded land is	Support noted. However, the Policy does not give a specific time period for the safeguarded land to be used in. It simply

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0582, RO0583., RO0586, RO0587, RO0588, RO0593, RO0594, RO0595, RO0597, RO0604, RO0614, RO0617, RO0622, RO0628, RO0630, RO0633, RO0635, RO0643, RO0646, RO0649, RO0650, RO0654, RO0655, RO0661, RO0662, RO0663, RO0664, RO0666, RO0667, RO0668, RO0669, RO0670, RO0671, RO0672, RO0673, RO0682, RO0683, RO0684, RO0685, RO0688, RO0702, RO0708, RO0711, RO0716, RO0717, RO0720, RO0725, RO0726, RO0729, RO0731, RO0733, RO0734, RO0739, RO0740, RO0749, RO0759, RO0761, RO0762, RO0768, RO0769, RO0770, RO0771, RO0780, RO0781, RO0785, RO0786, RO0800, RO0802, RO0803, RO0806, RO0807, RO0808, RO0814, RO0817, RO0818, RO0823, RO0826, RO0827,	<p>insufficient to meet the future needs of the Borough; and objects to the policy stating that safeguarded land is required to meet housing needs for the 15 years after the end of this Plan period.</p> <p>Objects to excessive removal of land from the Green Belt for safeguarding purposes beyond 2035 for a future plan period based on flawed assumptions. Developers will only build the most profitable sites which tend to be on rural fringes, leaving communities in need of it without. Safeguarding land now established a future need. Locations for development may not accord with decisions taken now.</p> <p>With regards to site 1ES, Warrington Council does not believe that this scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62 will be required. The scale of this future extension, would have a different relationship with Warrington and the Council therefore does not consider that this future extension could contribute to Warrington's future employment land supply.</p> <p>Initial feasibility studies on sustainability, highways and landscaping indicate that 1HS is available, suitable and deliverable and can come forward immediately within the Plan period. It is considered that it is not appropriate to safeguard this land for housing post 2035 when it can come forward for development within the plan period.</p> <p>The sites identified as safeguarded land for employment purposes should either be allocated for development within the plan period (site 2ES) or discounted entirely (site 1ES). Site 2ES should be allocated to meet the revised Objectively Assessed Need and employment land requirement suggested by Peel. Site 1ES will ultimately cater for Warrington's employment needs rather than St Helens' so it should not be counted as contributing to meeting St Helens' long term development needs. This generates a need for additional safeguarded land regardless of the conclusions reached on overall quantum.</p>	<p>states that it has been removed from the Green Belt to meet longer term development needs well beyond the Plan period, in line with national policy.</p> <p>The NPPF requires that when LPAs define Green Belt boundaries they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period.</p> <p>Comments noted. Additional wording is proposed to be added to Appendix 7 for Site 1ES.</p> <p>MODIFICATION No. AM077</p> <p>The GBR (2018) sets out a robust assessment criteria and justified reasons why this site has been designated as a proposed safeguarded site.</p> <p>The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St Helens GBR (2018). It is considered through the safeguarding of 85.88ha (1ES and 2ES) for employment land use beyond 2035, the LPSD strikes a balance between preserving the Green Belt and the need to meet longer term development needs as required by the NPPF.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0833, RO0834, RO0835, RO0836, RO0837, RO0838, RO0839, RO0840, RO0847, RO0848, RO0858, RO0859, RO0866, RO0868, RO0872, RO0887, RO0891, RO0896, RO0897, RO0899, RO0900, RO0902, RO0903, RO0904, RO0906, RO0911, RO0920, RO0921, RO0922, RO0924, RO0925, RO0926, RO0927, RO0928, RO0929, RO0930, RO0932, RO0934, RO0935, RO0938, RO0939, RO0946, RO0947, RO0948, RO0949, RO0950, RO0951, RO0952, RO0959, RO0962, RO0963, RO0964, RO0965, RO0966, RO0972, RO0973, RO0976, RO0979, RO0980, RO0984, RO0995, RO1003, RO1006, RO1007, RO1008, RO1015, RO1021, RO1022, RO1028, RO1030, RO1033, RO1034, RO1036, RO1040,	<p>Land south east of Junction 23, M6 (Haydock Point South) (GBR (2018) site reference GBP_036) has been unreasonably evaluated within the Council's evidence and site selection process. The site represents a highly credible alternative / additional site given its suitability, availability, and market appeal. From work undertaken to date, a positive solution is expected, which will enable Junction 23 improvements alongside the delivery of significant logistics development around Haydock Point. As a solution has not yet been identified, the mitigation solution can be designed to support the delivery of development on Haydock Point South.</p> <p>In addition, Site 1ES would contribute to Warrington's future needs rather than St Helens' and Peel object to the selection of the site ahead of Land to the South East of Junction 23.</p> <p>The site boundary for the site 2ES should be amended so that it includes additional land at the eastern end of the site. At present, the allocation boundary line is arbitrary and does not follow a defined or defensible route.</p> <p>Peel challenges the methodology that has been adopted to appraise the most suitable land to be removed from the Green Belt to meet the Borough's development needs. From the initial stage of the methodology (Stage 1A), the Council has not suitably identified appropriate parcels and sub-parcels which has subsequently led to inaccurate assessments of land, including Haydock Point South. Peel has previously promoted the land at Haydock Point South for development and as such the GBR (2018) should have acknowledged this land as an individual parcel, not just within the wider assessment of Parcel Ref. GBP_036. If the site had been appraised on its own merits, it is evident that the GBR (2018) should have reached a different conclusion in respect of its contribution to Green Belt purposes and the sites development potential, the overall score for the site would have been higher, and in excess of the</p>	<p>The reasons why land south east of Junction 23, M6 (GBR (2018) site reference GBP_036) is not considered suitable for allocation or safeguarding in the Plan are set out in the St Helens GBR (2018).</p> <p>Extending the site to the east as requested would represent a narrow 'neck' of development protruding into the Green Belt.</p> <p>The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1057, RO1058, RO1059, RO1072, RO1075, RO1076, RO1079, RO1080, RO1081, RO1082, RO1083, RO1084, RO1089, RO1090, RO1091, RO1092, RO1093, RO1101, RO1102, RO1104, RO1105, RO1110, RO1113, RO1114, RO1115, RO1116, RO1121, RO1124, RO1135, RO1136, RO1137, RO1142, RO1145, RO1146, RO1147, RO1148, RO1149, RO1150, RO1151, RO1152, RO1154, RO1159, RO1164, RO1175, RO1176, RO1180, RO1181, RO1186, RO1187, RO1192, RO1198, RO1201, RO1203, RO1204, RO1205, RO1206, RO1207, RO1210, RO1214, RO1216, RO1219, RO1222, RO1223, RO1225, RO1226, RO1227, RO1228, RO1234, RO1235, RO1237, RO1244, RO1249, RO1258, RO1259,	<p>alternative sites that have been proposed for release from the Green Belt within the Plan.</p> <p>The Council has overstated the Green Belt contribution made by site 2ES. The site is evaluated within the GBR (2018) as part of a wider land parcel including land to the North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high', i.e. that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 – preventing neighbouring towns merging - is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.</p> <p>The Council's decision to safeguard rather than allocate the site is unsound. Its reasoning is flawed and not supported by robust evidence. The decision is also highly detrimental and inconsistent with the Plan's stated strategic objectives.</p> <p>would not undermine the five purposes of Green Belt. Therefore, should be allocated within this Plan period and not be designated as a safeguarded site.</p> <p>In principle supports the inclusion of site 7HS, however, objects to its inclusion as a safeguarded site rather than an allocated site. Policy should be amended to reflect this. Amend Table 4.5 to include</p>	<p>The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p> <p>The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St Helens GBR (2018). It is considered through the safeguarding of site 3HS for housing beyond 2035, the LPSP strikes a balance between preserving the Green Belt and the need to meet longer term development needs as required by the NPPF.</p> <p>As above.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1269, RO1270, RO1288, RO1289, RO1293, RO1295, RO1296, RO1297, RO1298, RO1300, RO1306, RO1309, RO1310, RO1313, RO1318, RO1319, RO1323, RO1324, RO1327, RO1333, RO1334, RO1335, RO1336, RO1337, RO1338, RO1339, RO1340, RO1341, RO1342, RO1350, RO1351, RO1353, RO1354, RO1355, RO1356, RO1362, RO1364, RO1365, RO1366, RO1370, RO1371, RO1372, RO1373, RO1374, RO1375, RO1379, RO1380, RO1382, RO1383, RO1390, RO1391, RO1398, RO1403, RO1404, RO1405, RO1406, RO1407, RO1408, RO1415, RO1416, RO1417, RO1418, RO1420, RO1421, RO1422, RO1423, RO1424, RO1425, RO1426, RO1427, RO1430, RO1431, RO1432, RO1433, RO1434, RO1442,	reference to site 7HS as an allocated housing site and amend Table 4.8 to exclude reference to the site as a safeguarded housing site.	
		The Plan is landowner and developer led. Site 8HS had its name Eccleston Vale before the LPPO was published.	Comment noted.
		Removing site 8HS does not meet the exceptional threshold. The site is not sustainable, it has public rights of way running through it and is a flood plain. Local roads are already constrained, and additional traffic will come at a cost of safety and compound the existing situation. The site is remote from any rail hubs and public transport is inconsistent. Air pollution will worsen, and commercial traffic will increase due to the new SuperPort. Local schools are oversubscribed. There will be a further strain on healthcare facilities.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the Plan therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the GBR (2018). As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within this Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review, where issues including highway impact and local facilities will be further addressed.
		Site 8HS should be left to provide for food, in light of Brexit. Food production is becoming a more dominant issue.	Comment noted.
		Development of safeguarded sites will add pressure to existing schools and health facilities that are already inadequate. The local roads are already at full capacity in the Borough and would not cope with any further traffic.	Safeguarded sites are not expected to be brought forward before the next Plan period (i.e. 2035 +). Therefore, impact on the local road network will be further assessed at that stage; along with medical and educational facilities.
		Policy is unsound as it has been informed by a fundamentally flawed GBR (2018).	The Council's GBR (2018) sets out a robust approach and methodology for the release of Green Belt for housing and employment development. It fully takes account of the impact of developing sites on the character and purposes of Green Belt areas. Its methodology also takes relevant policies in the NPPF into account.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1445, RO1446, RO1449, RO1451, RO1452, RO1453, RO1458, RO1461, RO1462, RO1463, RO1467, RO1470, RO1471, RO1472, RO1473, RO1474, RO1475, RO1476, RO1479, RO1480, RO1485, RO1487, RO1491, RO1492, RO1495, RO1499, RO1501, RO1511, RO1522, RO1523, RO1524, RO1528, RO1531, RO1532, RO1533, RO1534, RO1536, RO1540, RO1541, RO1542, RO1547, RO1548, RO1551, RO1552, RO1553, RO1555, RO1556, RO1557, RO1558, RO1560, RO1563, RO1566, RO1567, RO1589, RO1590, RO1598, RO1599, RO1606, RO1608, RO1610, RO1611, RO1613, RO1615, RO1618, RO1620, RO1621, RO1623, RO1624, RO1626, RO1627, RO1629, RO1636, RO1637, RO1638, RO1641, RO1652, RO1653, RO1673,	<p>Identifying safeguarded sites, their preferred use and development capacity is not consistent with national policy as it is tantamount to allocating sites. These sites should be unallocated or shown as white land on the policies map.</p> <p>The Council recognised small/ windfall sites being able to consistently produce an average of 93 units per annum. This came from robust data over a 10year period. No account of these 93 units per annum has been taken when determining safeguarded land beyond the Plan period.</p> <p>The purpose of Green Belt is to provide people with areas to enjoy open space.</p> <p>Former LPPO site HS04 was set for release as safeguarded land. However, the Council have decided not to release it due to multiple ownerships. I have worked hard to contact owners of the land and know the remaining unsold land could come forward. Many owners are retired, and should this land come forward in the future it will be even harder to sort out. New build is on the perimeter of this site, with a residential housing area behind it and other farmhouses just past it. Why the land hasn't been released is a mystery.</p> <p>The Plan should safeguard the future supply of housing land (and the soundness of the Plan) by increasing the number of Safeguarded Land sites in the Borough, particularly in the north, as well as</p>	<p>Paragraph 139 of the NPPF states that Plans should “<i>where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period</i>”. Identifying their preferred use and potential capacity is not contrary to national policy, but rather a positive approach in identifying future long-term development needs.</p> <p>NPPF allows LPAs to make an allowance for windfall sites as part of anticipated supply. However, LPAs may only make an allowance for windfall if they have “<i>compelling evidence that they will provide a reliable source of supply</i>”. Windfall sites are finite, and as safeguarded land is not expected to come forward until 2035, any estimated supply from windfall sites that far into the future would be considered unreliable. Instead the inclusion of a windfall allowance for post 2035 will be considered through the Plan making process, either at a Local Plan Review or when the next Local Plan is prepared, based on up to date housing delivery evidence at that time.</p> <p>Paragraph 134 of the NPPF sets out the 5 purposes of Green Belt, providing people with areas to enjoy open space is not one of them.</p> <p>This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options Stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).</p> <p>This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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	RO1674, RO1678, RO1679, RO1681, RO1682, RO1688, RO1695, RO1699, RO1700, RO1716, RO1728, RO1729, RO1730, RO1731, RO1734, RO1735, RO1737, RO1738, RO1740, RO1741, RO1746, RO1751, RO1752, RO1753, RO1757, RO1759, RO1761, RO1781, RO1782, RO1787, RO1789, RO1791, RO1792, RO1793, RO1794, RO1795, RO1796, RO1804, RO1814, RO1815, RO1816, RO1819, RO1829, RO1850, RO1851, RO1852, RO1855, RO1856, RO1857, RO1858, RO1864, RO1865, RO1866, RO1867, RO1868, RO1870, RO1875, RO1877, RO1878, RO1881, RO1882, RO1884, RO1888, RO1889, RO1890, RO1892, RO1893, RO1894, RO1895, RO1897, RO1898, RO1899, RO1900, RO1901, RO1902, RO1905, RO1906, RO1907,	<p>providing an early release mechanism in the event that the delivery of other sites should fail. Former LPPO site HS21 (GBP_011_C) is available and deliverable and would represent a logical infill/rounding-off of development in a part of the Borough where little provision has been made to support future growth. The landscape impact that the development of the site would have must be read in the context of the surrounding site allocations; on this basis, HS21 would serve no tangible benefit as an area of Green Belt.</p> <p>Object to the removal of former LPPO site HS18. It is believed that the Green Belt boundary shown on the Policy Map is unjustified, not positively prepared, and inconsistent with national policy in that it reduces the Plan's ability to respond flexibly to changing circumstances. This is contrary to national planning policy.</p> <p><u>Please see sections below on individual sites for more specific comments made by local residents, developers/landowners and statutory consultees.</u></p>	<p>Options Stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).</p> <p>This site has been re-appraised in accordance with the GBR (2018). As a result of this process, and of the reduced housing requirement set by Policy LPA05 compared to the Preferred Options Stage, the Plan proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the GBR (2018).</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1914, RO1915, RO1916, RO1933, RO1934, RO1935, RO1937, RO1943, RO1952, RO1953, RO1954, RO1955, RO1958, RO1959, RO1960, RO1961, RO1964, RO1965, RO1967, RO1968, RO1972, RO1973, RP1979, RO1981, RO1984, RO1986, RO1989, RO1990		
Site 1ES	RO0136, RO0301, RO1629, RO1959, RO1965	Supportive of the site's release from Green Belt which sets the principle for the future development of the site, however, objects to the safeguarding of the land given that the land is required by the market now and can be delivered in the immediate short term.	<p>The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. There is insufficient land in the Borough's urban areas (and in those of neighbouring districts) to provide for future development land needs and therefore some sites need to be removed from the Green Belt to accommodate new development. The LPSP proposes a reduction in the amount of Green Belt release due to the reduction in the annual housing requirement from 570 to 486 dwellings per annum.</p> <p>When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. Therefore, the Council took the positive step to allocate sufficient land for not just this Plan period, but the following too.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

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		<p>Objects to site being safeguarded, the LPSD is recognised as pro-growth in allocating employment land but doesn't go far enough to meet projected growth needs in the warehousing and logistics market - the growth requirements for the logistics sector alone region wide is 400-500 hectares over the next 25 years.</p>	<p>BE Group agree that the strong warehousing and logistics market is a factor in the market at present, and this has already been accounted for both in the baseline trend and the additional demand estimates.</p> <p>It is BE Group's opinion that the allocation and release of further employment land suitable for market conditions is likely to lead to a spike in take-up in the short term as the market 'catches up'. This will only be a short-term spike, before the market moderates. The distribution market is strong due to the growth of the online retail market, which is anticipated to see further growth in coming years. However, there is a limit as to the resulting warehousing growth in St Helens from this market, with growth likely to plateau once key retail occupiers that want to be in St Helens establish a position. It is difficult to envisage that over the 25-year forecast timeframe that warehousing growth in St Helens to service the online retail market would need to continue at the current fast pace.</p> <p>In addition, at 234.08ha the LPSD employment land allocations are 18.68ha higher than the residual employment land requirement (excluding site 1EA). This approach is based on the need to reverse the suppression of employment land take-up the Borough has experienced since 2005 (caused by an inadequate supply of market attractive sites) and the need to provide flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA, over and above the 65ha uplift already applied to the baseline Objectively Assessed Need. There is therefore considered to be sufficient contingency in the LPSD employment land allocations to meet sub-regional B8 strategic land needs and consequently there is no need to increase the Objectively Assessed Need.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		The 30-hectare site can deliver 1.4 million sq. ft. of logistics floorspace and its development will bring significant job creation and socio-economic benefit. The site is available and is in the control of a single owner and is a natural extension of the existing successful Omega Business Park; and can be achieved within 5 years as evidenced by the supporting Delivery Statement.	The site is still proposed for safeguarding. Further details of the reasons are set out in the GBR (2018). This sets out robust assessment criteria and justified reasons for it to be safeguarded for employment use.
		There are no technical constraints that will prevent the development coming forward as evidenced by the background technical assessments and studies submitted with this representation.	The site is still proposed for safeguarding. Further details of the reasons are set out in the GBR (2018). This sets out robust assessment criteria and justified reasons for it to be safeguarded for employment use.
		Access to the site can be achieved.	See above.
		The amount of safeguarded land allocated is excessive and some of the proposed sites should be removed. It is difficult to forecast the future requirement and more previously developed land could come forward in the future.	When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. NPPF Paragraph 139 instead requires that when amending Green Belt boundaries Plans should " <i>where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period</i> ". Therefore, the Council took the positive step to allocate sufficient land for not just this Plan period, but the following too.
Site 2ES	RO0107, RO0157, RO0200, RO0215, RO0226, RO0245, RO0260, RO0301, RO0320, RO0345, RO0502, RO0597, RO0780, RO0817, RO0818, RO0836,	<p>Wigan Council has a holding objection on the current planning application for this site. Wigan Council are supportive of this policy stance and the current application should be refused; however, they do have concerns as follows:</p> <ul style="list-style-type: none"> • The Green Belt boundary should be amended around this site (2ES); 	<p>The Green Belt boundary has been set out in order to comply with paragraph 138 of the NPPF, which states Plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</p> <p>Additional modifications are proposed to the site's proforma in Appendix 7 in order to ensure developers for the site must liaise with Highways England and St Helens Council to identify</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0837, RO0838, RO0839, RO0840, RO0921, RO0934, RO1072, RO1203, RO1204, RO1333, RO1334, RO1335, RO1336, RO1372, RO1430, RO1445, RO1511, RO1557, RO1558, RO1629, RO1641, RO1867, RO1868, RO1878, RO1881, RO1959	<ul style="list-style-type: none"> • Policy should be clear that improved highways infrastructure needs to be in place before any development is operational; • Public transport needs to be improved should the A49 be diverted and accessibility between Ashton-in-Makerfield and Newton-le-Willows be maintained; • If the A49 is diverted, the approach to Wigan from the south and Ashton-in-Makerfield in particular, needs appropriate consideration as a gateway route with emphasis on environmental quality; 	<p>and deliver any enhancement work required to M6 Junction 23 to mitigate any impacts from the proposed development.</p> <p>MODIFICATION No. AM077</p> <p>Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that “high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”</p>
		<p>Traffic on the East Lancashire Road is horrendous and additional traffic generated by this development will be detrimental to people’s journey time and health.</p> <p>Highway congestion at peak times is already extremely high, leading to damaging emissions and elevated costs to the economy. Residents of Ashton-in-Makerfield feel the negative impacts caused by the employment allocations of this Plan. Predicted traffic volumes will add to existing problems at junction 23 of the M6.</p> <p>Further traffic generation and the difficulties associated with large heavy goods vehicles using local roads.</p>	<p>The Council has commissioned a Study into improvement options at Junction 23 of the M6, which is being undertaken in partnership with Wigan Council and Highways England. This Study will provide a detailed identification of capacity issues and an outline of potential options for further development. It is envisaged that it will ultimately determine the scale and design of a potential large-scale improvement scheme for Junction 23.</p> <p>Policy LPA07 addresses transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10.</p>
		<p>The Greater Manchester Clean Air Plan has identified the A49 as an air quality concern; levels of nitrogen dioxide will exceed legal limits by 2020 if no action is taken. This will be made worse if the proposed development goes ahead and will impact on the health and wellbeing of local residents, and nearby three secondary schools.</p>	<p>LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. These policies seek better transport links between housing sites and the new employment sites.</p>
		<p>Object to the designation of this site as it preforms most of the Green Belt purposes.</p>	<p>The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. There is insufficient land in the Borough’s urban areas (and in those of neighbouring districts)</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			to provide for future development land needs and therefore some sites need to be removed from the Green Belt to accommodate new development. The justification for the site's removal can be viewed in the GBR (2018).
		<p>The site has been unreasonably evaluated within the Council's evidence and site selection process. The site represents a highly credible alternative / additional site given its suitability, availability, and market appeal. From work undertaken to date, a positive solution is expected, which will enable Junction 23 improvements alongside the delivery of significant logistics development around Haydock Point. As a solution has not yet been identified, the mitigation solution can be designed to support the delivery of development on Haydock Point South.</p> <p>In addition, the site would contribute to Warrington's future needs rather than St Helens' and Peel object to the selection of the site ahead of Land to the South East of Junction 23.</p>	<p>The reasons why land south east of Junction 23, M6, GBR (2018) (Ref: GBP_036) is not considered suitable for allocation or safeguarding in the Plan are set out in the St Helens GBR (2018).</p>
		<p>The site plays a valuable strategic role in providing a buffer and important separation between Haydock in St Helens, Golborne in Wigan and the respective Metropolitan areas of Merseyside and Manchester.</p> <p>Using Green Belt fails to encourage urban regeneration by recycling derelict and other urban land. There are many other sites development could take place. Creating new jobs is a good thing but this will lead to more commuters coming in and out of the borough for work. There is no guarantee that jobs resulting from the proposed development would benefit local people.</p>	<p>The GBR (2018) acknowledges that this site forms part of a wider strategic gap between Haydock and Golborne and Haydock and Ashton-in-Makerfield. Development here will lead to the physical merging of Haydock and Ashton-in-Makerfield and reduces the scale and integrity of the gap between Haydock and Golborne.</p> <p>However, a strategic aim of the LPSD is to provide sufficient land to meet local employment land needs, in order to ensure a strong and sustainable local economy. The spatial strategy recognises, that to meet employment land needs, land will need to be removed land from the Green Belt and allocated for employment development. In light of market evidence, the proposed spatial strategy is to largely focus new employment development on large sites capable of accommodating large</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			scale employment opportunities, in close proximity to the strategic road network of the M6 and M62.
		<p>The Council has overstated the Green Belt contribution made by site 2ES. The site is evaluated within the GBR (2018) as part of a wider land parcel including land to the North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high', i.e. that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 – preventing neighbouring towns merging - is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.</p> <p>The Council's decision to safeguard rather than allocate the site is unsound. Its reasoning is flawed and not supported by robust evidence. The decision is also highly detrimental and inconsistent with the Plan's stated strategic objectives.</p>	The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.
		The site boundary for the site 2ES should be amended so that it includes additional land at the eastern end of the site. At present, the allocation boundary line is arbitrary and does not follow a defined or defensible route.	Extending the site to the east as requested would represent a narrow 'neck' of development protruding into the Green Belt.
Site 1HS	Further objections / issues raised by local residents in relation to this site have been addressed under Policy LPA06 and General Comments.		

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
(see also section Site 1HA)	RO0021, RO0022, RO0058, RO0077, RO0079, RO0080, RO0081, RO0087, RO0089, RO0096, RO0113, RO0134, RO0137, RO0139, RO0140, RO0141, RO0142, RO0156, RO0157, RO0161, RO0184, RO0189, RO0236, RO0237, RO0316, RO0317, RO0329, RO0334, RO0337, RO0338, RO0339, RO0340, RO0341, RO0342, RO0365, RO0383, RO0400, RO0403, RO0405, RO0408, RO0415, RO0421, RO0431, RO0432, RO0433, RO0443, RO0444, RO0460, RO0464, RO0477, RO0483, RO0484, RO0487, RO0506, RO0507, RO0516, RO0521, RO0566, RO0567, RO0575, RO0576, RO0594, RO0595, RO0617, RO0630, RO0635, RO0649, RO0656, RO0657, RO0664, RO0669, RO0717, RO0720, RO0729, RO0749, RO0762, RO0768, RO0769, RO0781, RO0786, RO0802, RO0803, RO0814, RO0817, RO0818, RO0858, RO0906, RO0924, RO0932, RO0938, RO0939, RO0952, RO0963, RO0972, RO0973, RO0976, RO1003, RO1007, RO1008, RO1030, RO1079, RO1080, RO1089, RO1090, RO1091, RO1092, RO1111, RO1112, RO1146, RO1186, RO1187, RO1198, RO1201, RO1203, RO1204, RO1219, RO1234, RO1235, RO1259, RO1300, RO1313, RO1321, RO1322, RO1323, RO1324, RO1327, RO1333, RO1334, RO1335, RO1336, RO1341, RO1370, RO1371, RO1373, RO1375, RO1380, RO1383, RO1390, RO1391, RO1404, RO1405, RO1406, RO1407, RO1415, RO1417, RO1418, RO1423, RO1424, RO1425, RO1426, RO1427, RO1431, RO1432, RO1433, RO1434, RO1442, RO1453, RO1461, RO1462, RO1463, RO1479, RO1480, RO1485, RO1491, RO1522, RO1523, RO1524, RO1536, RO1560, RO1563, RO1606, RO1610, RO1611, RO1615, RO1626, RO1627, RO1629, RO1638, RO1652, RO1678, RO1679, RO1681, RO1682, RO1735, RO1737, RO1738, RO1740, RO1741, RO1751, RO1752, RO1753, RO1757, RO1759, RO1794, RO1795, RO1829, RO1857, RO1866, RO1867, RO1875, RO1877, RO1878, RO1882, RO1884, RO1890, RO1892, RO1893, RO1894, RO1895, RO1897, RO1898, RO1905, RO1906, RO1916, RO1933, RO1934, RO1935, RO1953, RO1960		
		Development of 1HS will support the development principles identified in LPA03. Bringing it forward as a housing allocation instead of as Safeguarded land would mean the benefits of its development could be realised sooner and delivered within the plan period. The site is unconstrained and in one ownership. There needs to be an increase to the number of dwellings allocated in the Local Plan.	The proposed allocations actually provide an additional 361 units on proposed Green Belt sites than is required to meet the housing requirement; and if a non-delivery reduction was not applied to the SHLAA, the overall housing supply in the Plan period would actually be 8,400 units (6,344 units in the SHLAA and 2,056 units on the Green Belt sites); this is 16% above the 7,245 residual requirement. Therefore, the Plan is already oversupplying, so there is no need to allocate further sites.
		Development will increase pollution, with the number of children with asthma on the increase.	LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development.
		Although it is acknowledged that existing policies are in place to protect the open space in this area, proposed sites (1HA & 1HS) put the existing open space at risk, as there would be no opportunity to extend this area.	Comments noted. Policies LPC05 and LPD03 state any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.
		A number of objections were received by local residents, whose objections are as follows: <ul style="list-style-type: none"> The development will generate significant additional road traffic and will exacerbate existing problems particularly at Ashton 	<ul style="list-style-type: none"> Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that "high quality road, public transport and active travel links will be required between existing and proposed residential areas,

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>Cross which despite recent road improvements is still experiencing significant hold ups during peak periods;</p> <ul style="list-style-type: none"> The land marked for development has shallow mine workings and collapses take place frequently; There is a large water and gas main that both cross the site which would restrict development. 	<p>particularly those with high deprivation levels, and areas of employment growth”;</p> <ul style="list-style-type: none"> Known constraints of the site would be addressed at any future planning application stage; As above.
Site 2HS	RO0138, RO1366, RO1372, RO1629	Site should be allocated within this Plan period and not safeguarded.	The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St Helens GBR (2018). It is considered through the safeguarding of site 2HS for proposed housing use beyond 2035, the LPSD strikes a balance between preserving the Green Belt and the need to meet longer term development needs as required by the NPPF.
		A business case for a new road joining Vista Road and Ashton Road, improving accessibility to Earlestown Town centre and Sankey Valley Industrial Estate should be put together.	As this is a safeguarded site, it is not considered necessary to carry out such a business case at this stage.
		The amount of safeguarded land allocated is excessive and some of the proposed sites should be removed. It is difficult to forecast the future requirement and more previously developed land could come forward in the future.	The NPPF requires that when LPAs define Green Belt boundaries they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period.
		Traffic levels and congestion on Vista Road is intolerable and development here would further overload the area and have an adverse effect.	Policy LPA07 addresses transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Site 3HS	RO0018, RO0039, RO0040, RO0056, RO0090, RO0105, RO0109, RO0114, RO0126, RO0174, RO0201, RO0202, RO0205, RO0225, RO0258, RO0259, RO0261, RO0271, RO0272, RO0279, RO0280, RO0300, RO0301, RO0321, RO0332, RO0349, RO0355, RO0382, RO0409, RO0424, RO0425, RO0448, RO0449, RO0488, RO0495, RO0508, RO0509, RO0515, RO0522, RO0523, RO0525, RO0532, RO0551, RO0614, RO0622, RO0626, RO0643, RO0646, RO0650, RO0661, RO0662, RO0663, RO0671, RO0672, RO0673, RO0711, RO0716, RO0725, RO0726, RO0740, RO0771, RO0785, RO0800, RO0806, RO0807, RO0808, RO0826, RO0827, RO0847, RO0848, RO0859, RO0868, RO0902, RO0903, RO0911, RO0926,	Development of this site is fully in accordance with Policy LPA02. The site is sustainable, unconstrained and deliverable and should therefore be allocated to contribute towards the identified housing requirements.	Support noted.
		Development of site 3HS would undoubtedly generate a significant amount of traffic, and as such we do have concerns over the potential impact of developing this site around the sensitive local road network. Knowsley Council would welcome discussions in due course in order to minimise the potential impacts on the highway network and local residents.	Comments noted. Traffic generation through new development will be addressed through encouraging and improving methods of sustainable transport. Discussions will continue through our duty to cooperate.
		<p>Rainhill Save Our Green Belt (RSOGB) Action Group and a number of local residents made representations which can be summarised as follows:</p> <ol style="list-style-type: none"> 1. Allocating this site would not meet the Strategic Aims & Objections; 2. There are no proposals concerning how 3HS would accommodate additional housing development in terms of infrastructure. Significant concerns regarding the local highway network. Many roads are congested especially at peak times. Development of this site will lead to hundreds of additional cars using already very congested roads. Potential access points are also of concern given the local road network is so congested. The additional traffic will make it dangerous for both pedestrians and vehicles alike, particularly the signalised junctions of Rainhill Road and Longton Lane with Warrington Road. In conjunction with other development nearby 2000 additional cars would be chaotic; 3. No evidence of collaboration between the Council and neighbouring authorities, especially regarding traffic congestion; 	<ol style="list-style-type: none"> 1) The Strategic Aims & Objectives facilitate the spatial vision, which will provide good quality housing in order to meet local needs; 2) An integral part of the LPSD is to ensure that development proposals are supported by the satisfactory provision of all forms of infrastructure (Policy LPA08). Policy LPA02 states that “high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”. Furthermore, the IDP is a living document and supports the LPSD and will identify what infrastructure is required, when it is needed, who is responsible for its provision and how it will be funded; 3) A separate Duty to Cooperate statement has been submitted alongside the LPSD, and a yearly summary of how the Council continues to fulfil the Duty to Cooperate is

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0929, RO0930, RO0946, RO0947, RO0948, RO0949, RO0959, RO0960, RO0961, RO0962, RO0966, RO0984, RO0995, RO1006, RO1015, RO1028, RO1040, RO1058, RO1075, RO1081, RO1082, RO1083, RO1084, RO1101, RO1104, RO1105, RO1110, RO1113, RO1124, RO1142, RO1180, RO1181, RO1207, RO1210, RO1214, RO1222, RO1223, RO1225, RO1226, RO1227, RO1228, RO1237, RO1249, RO1258, RO1291, RO1295, RO1296, RO1298, RO1309, RO1310, RO1337, RO1338, RO1339, RO1350, RO1351, RO1353, RO1354, RO1355, RO1356, RO1362, RO1398, RO1403, RO1416, RO1416, RO1420, RO1421, RO1422, RO1451, RO1452, RO1467, RO1487, RO1499, RO1528, RO1551, RO1552, RO1553, RO1566, RO1567,	<p>4. Development would lead to urban sprawl connecting Portico, Thatto Heath, Nutgrove, Rainhill, Whiston and Prescot;</p> <p>5. There are no air pollution monitors in the area, and no traffic counts have been carried out for over 4 years. Additional traffic will only lead to further air and noise pollution. Air pollution is already a problem with over 50 people dying from respiratory problems already this year. Green Belt is needed to break down pollution and provide fresh air;</p> <p>6. The figures published are not consistent with national policy and there is no transparency, as certain information relating to the SHELMA agreement have been withheld.</p> <p>7. Eccleston Park railway station is already at full capacity there will be further demand on the parking which isn't there;</p> <p>8. There are no exceptional circumstances to justify the releasing of this land from Green Belt, with no consideration for development taking place in neighbouring authorities;</p> <p>9. The site is home to 59 species of birds, mammals, flora and fauna, with more than 13 protected species, all of which will be lost. There has been no ecological report/survey undertaken to support the Plan. It is not considered that the mitigation in Policy LPC06 would be sufficient to protect these species;</p> <p>10. The site lies within flood zone 2 & 3, with a high-water table, this will only worsen;</p> <p>11. Sport England is a statutory body and their objection has not been resolved;</p>	<p>contained in the Authority Monitoring Report. The Council will continue to work closely with Knowsley Council in this respect;</p> <p>4) The site benefits from strong boundaries and is encroached on almost all sides by urban development. Furthermore, the Plan is aligned with the NPPF, specifically paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt;</p> <p>5) The Environment Act 1995 gave the Council a duty to review air quality within the Borough. The Council use continuous analysers and passive diffusion tubes to monitor air quality at several locations within the Borough. LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. These policies seek better transport links between housing sites and the new employment sites. Equally not all new trips will be car based, and the need to facilitate increased use of public transport, cycling and walking is a recurrent theme throughout the Plan. This should help to ensure that new development is located close to services and jobs, thereby reducing the number of trips that need to be made;</p> <p>6) Figures relating to housing numbers are clearly set out in the Reasoned Justification for Policy LPA05;</p> <p>7) Appendix 7 of the LPSD sets out what the requirements for each safeguarded site are. The requirements for this site state, amongst others, that safe pedestrian and cycle access should be provided to the rail station and consideration should be given to the potential provision of park and ride facilities;</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO1599, RO1608, RO1629, RO1653, RO1695, RO1699, RO1700, RO1734, RO1746, RO1789, RO1816, RO1819, RO1850, RO1851, RO1855, RO1856, RO1858, RO1865, RO1870, RO1899, RO1900, RO1961, RO1984, RO1989, RO1990	<p>12. The site has numerous physical constraints including highway issues, electric pylons and United Utilities assets throughout the site;</p> <p>13. Safeguarding the site will not guarantee its protection for the next 15 years given that future requirements cannot be predicted;</p> <p>14. The IDP highlights the projects currently underway in the Borough to try to alleviate the problems of today, however, it seems to lack any substance on what will be done to solve the issues of the future. The idea that we as a local community can accommodate the level of housing development being proposed within the LPSD without a clear and defined IDP, is simply not acceptable.</p>	<p>8) There is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs. Exceptional circumstances therefore exist to release land from the Green Belt. The Council consider this is a robust approach and is consistent with national policy. The housing requirement seeks to strike an appropriate balance between planning to meet the economic and social needs of the Borough, whilst preserving the Green Belt;</p> <p>9) Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife and affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St Helens Biodiversity Supplementary Planning Document (2011);</p> <p>10) Policy LPC12 will help to ensure a sustainable drainage system is in place and flood risk is reduced. The site lies within flood zone 1;</p> <p>11) Sport England has raised no objections to the site as part of this consultation process;</p> <p>12) Known constraints of the site would have to be addressed at any future planning application stage;</p> <p>13) Paragraph 33 of the NPPF requires LPA's to review and assess policies in the Local Plan at least once every five years and update if necessary, which will include assessing the level of need for housing and employment land compared to site supply. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			<p>granted following a future Local Plan review that proposes such development;</p> <p>14) The specifics of some infrastructure, understandably, cannot be identified at this stage. However, the IDP is considered a living document and will be updated accordingly.</p>
		There are insufficient allocated sites to meet the housing requirement and therefore deliver the wide-ranging mix of housing set out in this policy. Without a suitable quantum and mix of housing sites the aims and objectives of this policy will not be achieved. Site 3HS should be allocated for housing. This site would meet all of the aims and objectives that are set out in Policy LPC01.	The proposed allocations actually provide an additional 361 units on proposed Green Belt sites than is required to meet the housing requirement; and if a non-delivery reduction was not applied to the SHLAA, the overall housing supply in the Plan period would actually be 8,400 units (6,344 units in the SHLAA and 2,056 units on the Green Belt sites); this is 16% above the 7,245 residual requirement. Therefore, the Plan is already oversupplying, so there is no need to allocate further sites.
		LPSD allocated sites 1HA, 2HA, 4HA, 5HA, 7HA, 8HA, were all assessed in the GBR (2018) and there does not appear to be any material planning reasons as to why they have taken precedent over the allocation of 3HS.	The reasons for sites being allocated and safeguarded are set out in the GBR (2018).
		Cllr Grunewald deplores the Government's changed policy that requires all local councils to assign more land for development. He would also like to place on record that he shares local residents concerns that development in Rainhill will lead to additional traffic congestion on local roads, a problem that will be intensified should the High School be expanded.	Comment noted.
Site 4HS	RO0138, RO0475, RO0588, RO1629, RO1955,	Dispute the fact that HE asked the Council to reduce the size of the site due to its impact on the Conservation Area, as it is not documented in HE's submission at LPPO stage, and as such the Council's evidence base is flawed. To seek to avoid the development of a significant portion of our Client's site on the basis of an alleged need to retain openness around the village is at odds with its established setting. We therefore submit that the full extent of the	<p>Following discussions between the Council's Conservation Officer and HE, the Council's Conservation Officer undertook a series of HIA's across the Borough, some had been suggested by HE and others following concerns from the Council's Conservation Officer.</p> <p>The conclusion of the HIA was that development should not take place close to the Vulcan Village Conservation Area</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Site should be reinstated, on the basis that the evidence base behind the Council's decision to physically curtail the site is inadequate and the associated conclusions are not justified. The existing play area in the Council's ownership is under-utilised, with no known shortage of recreational facilities – the exclusion of this land is not sufficiently justified, and the Council should take a proactive decision to reinstate this land.	(which it adjoins at the southern tip) in order to remove any potential harm to both the character and appearance of the Conservation Area and its setting.
		Further access and egress should be considered for this site. Any provision to develop this site should include the requirement to link the development directly to the A49/Winwick Road over these access routes so that traffic can get more direct access to the motorways and Parkside Link Road without having to pass through the town centre.	The Parkside link road scheme (reference P/2018/0249/FUL) has now been called in by the Secretary of State, having been assessed through the planning application process. LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. The proposed Parkside link road will help address the potential for local congestion as a result of development at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
Site 5HS	-	-	-
Site 6HS	RO0682, RO0683, RO0684, RO0685, RO1075, RO1340, RO1629, RO1964	Supports removal of land from Green Belt and its allocation as a safeguarded housing site.	Support noted.
		This site is best related to 1EA, 1ES and 10EA and as such should be allocated as a sustainable site, capable of supporting the plans growth strategy.	The site is still proposed for safeguarding. Further details of the reasons are set out in the GBR (2018). This sets out robust assessment criteria and justified reasons for it to be safeguarded for housing use.
		The Plan relies upon larger sites which present significant complex challenges. The Plan should include a mix of sites (large and small) to meet its housing requirements in different locations across the Borough.	It is anticipated that 6,344 dwellings will be supplied via small and medium sites within the SHLAA. These sites as well as differing in size are dispersed throughout the Borough.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Concern that development of this site will lead to traffic congestion with site access concerns.	Policies LPA07 and LPA08 address the potential issue of traffic from new development.
		Development here will lead to urban sprawl.	The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.
Site 7HS	RO0935, RO1075, RO1159, RO1528, RO1629, RO1961, RO1984	Supports the inclusion of this site in the Plan, however objects to the site being safeguarded and not allocated.	Comment noted. The site was assessed within the GBR (2018), where all conclusions are set out.
		Concern from local residents that the existing local highway network is already too congested and cannot take additional traffic. The development of this site will have an impact on nearby existing houses and Lea Green rail station will not be able to cope with more commuters.	The impact on local highways infrastructure is covered by relevant Policies (e.g. LPA07 and LPA10).
		There is a lack of educational and health facilities within the area, with Whiston hospital already stretched. There are digital communications issues here.	Policy LPA08 requires new development to be adequately served by infrastructure.
		The site is too close to the school and will lead to pollution.	Air quality issues are addressed in Policy LPD09.
		There have already been a number of houses built in the immediate area.	Comment noted.
Site 8HS	Further objections / issues raised by local residents in relation to this site have been addressed under Policy LPA06 and General Comments.		
	RO0007, RO0028, RO0035, RO0039, RO0041, RO0053, RO0082, RO0098, RO0100, RO0105, RO0109, RO0111, RO0115, RO0117, RO0119, RO0125, RO0146, RO0154, RO0162, RO0168, RO0169, RO0195, RO0196, RO0197, RO0202, RO0209, RO0217, RO0218, RO0224, RO0239, RO0250, RO0271, RO0273, RO0274, RO0283, RO0307, RO0308, RO0313, RO0314, RO0315, RO0322, RO0323, RO0332, RO0346, RO0347, RO0351, RO0352, RO0357, RO0358, RO0372, RO0373, RO0378, RO0379, RO0397, RO0419, RO0424, RO0425, RO0446, RO0447, RO0449, RO0450, RO0452, RO0453, RO0454, RO0456, RO0472, RO0473, RO0498, RO0499, RO0509, RO0510, RO0517, RO0518, RO0519, RO0531, RO0542, RO0543, RO0554, RO0555, RO0560, RO0562, RO0572, RO0581, RO0582, RO0583,		

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>RO0593, RO0626, RO0654, RO0655, RO0666, RO0667, RO0668, RO0670, RO0688, RO0702, RO0731, RO0733, RO0734, RO0735, RO0738, RO0739, RO0740, RO0759, RO0761, RO0770, RO0771, RO0819, RO0823, RO0831, RO0833, RO0834, RO0835, RO0887, RO0896, RO0897, RO0899, RO0900, RO0922, RO0925, RO0927, RO0928, RO0964, RO0965, RO0979, RO0980, RO0994, RO1021, RO1022, RO1031, RO1035, RO1036, RO1038, RO1057, RO1060, RO1101, RO1102, RO1115, RO1116, RO1121, RO1135, RO1136, RO1137, RO1147, RO1148, RO1149, RO1150, RO1151, RO1175, RO1176, RO1192, RO1195, RO1205, RO1206, RO1269, RO1270, RO1288, RO1291, RO1293, RO1297, RO1309, RO1310, RO1318, RO1319, RO1343, RO1344, RO1345, RO1364, RO1365, RO1374, RO1379, RO1382, RO1408, RO1410, RO1420, RO1421, RO1422, RO1439, RO1446, RO1449, RO1458, RO1475, RO1476, RO1500, RO1501, RO1531, RO1532, RO1533, RO1534, RO1547, RO1548, RO1555, RO1556, RO1589, RO1590, RO1621, RO1623, RO1624, RO1629, RO1633, RO1636, RO1637, RO1673, RO1688, RO1716, RO1728, RO1729, RO1730, RO1731, RO1781, RO1782, RO1787, RO1791, RO1792, RO1793, RO1796, RO1814, RO1815, RO1888, RO1901, RO1902, RO1914, RO1915, RO1937, RO1954, RO1961, RO1972, RO1973, RO1979, RO1980, RO1981, RO1984</p>	
		<p>A number of local residents objected to the proposed safeguarding of this site on a number of issues. Some points have already been addressed under the General Points or Policy LPA06 sections; other issues raised are as follows:</p> <ul style="list-style-type: none"> • There are major water pipelines that cannot be built upon running through the site; • The Local Plan promotes unsustainable traffic growth which will cause severe traffic issues. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems; • This site is situated on the rural fringe remote from transport hubs, contrary to sustainable transport objectives of National policy. Additional traffic in the Eccleston area and general borough traffic will greatly exacerbate the current situation, with many local roads and junctions already facing capacity issues; • Employment opportunities are over 6km away with no connecting public transport service; • This site will discharge 1,850 residential vehicles onto the surrounding road network, and unlike site 3HS the Plan does not place any restrictions on the housing number; 	<ul style="list-style-type: none"> • Comments noted. Due consideration will be given to these water pipes at masterplanning stage, with full consultation with United Utilities; • Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that <i>"high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth"</i>; • The majority of the site is within 400m of a safe and convenient walk to a bus stop. There is a minimum of 4 services an hour in this location, predominantly to and from St Helens Town Centre. Should the proposed site come forward for development then as part of any masterplan exercise, highway issues would need to be addressed, including the impact on surrounding and existing development, all of which could be mitigated for, with local bus routes extended and accommodated within the development; • As above;

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<ul style="list-style-type: none"> The land has landscape and recreational value being crossed by 4 public rights of way, which provide walking routes for local residents; The sites that are proposed for release from the Green Belt, provide 'easy' options for the developers that will be relied on to develop sites. This would be detrimental to the residents of the Borough and would cause a level of harm that is unjustified and unsustainable. 	<ul style="list-style-type: none"> Site 3HS has significant highway constraints that have meant that its overall capacity will have to be capped. Site 8HS does not have the same highway constraints; It is the Council's intention to retain Public footpaths, albeit some may have to be re-routed accordingly; The Plan's housing and employment allocations have been through vigorous SA's and Strategic Environmental Assessments to address any social, economic and environmental impacts from the development. Sustainable transport is addressed in Policies LPA07 and LPA08.
Table 4.7 (p50)	-	-	-
Table 4.8	RO0935	Amend table and remove reference to 7HS as this should be a strategic site and referenced in Table 4.6.	The GBR (2018) sets out a robust assessment criteria and justified reasons why this site has been designated as a proposed safeguarded site.
Policy LPA07: Transport and Travel	RO0012, RO0013, RO0014, RO0017, RO0034, RO0066, RO0110, RO0146, RO0157, RO0159, RO0235, RO0249, RO0281, RO0282, RO0326, RO0366, RO0425, RO0472, RO0543, RO0568, RO0604, RO0620, RO0621, RO0628, RO0656, RO0657, RO0660, RO0675, RO0731, RO0732, RO0732, RO0767, RO0831, RO0849,	Supports that paragraph 1, criterion b) of Policy seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport.	Support noted.
		HE states that the following housing sites are likely to have the greatest impact on the Strategic Rail Network, 1HA, 2HA, 4HA, 5HA, 6HA, 7HA, 9HA and 10HA; and therefore, would welcome early involvement during the planning process for each of these sites.	The site proformas in Appendix 5 will be updated accordingly. MODIFICATION No. AM074
		The HBF and a number of developers' object to paragraph 3, criterion c), which states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. The Plan should encourage working with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of	Comments noted. However, the wording is considered consistent with national policy and the need to provide EV charging equipment for new development.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
	RO0850, RO0851, RO0872, RO0875, RO0902, RO0903, RO0904, RO0919, RO0950, RO0951, RO1058, RO1059, RO1076, RO1093, RO1114, RO1116, RO1134, RO1152, RO1154, RO1159, RO1164, RO1165, RO1170, RO1178, RO1179, RO1184, RO1239, RO1241, RO1375, RO1470, RO1471, RO1472, RO1473, RO1474, RO1494, RO1495, RO1513, RO1540, RO1541, RO1542, RO1598, RO1620, RO1691, RO1692, RO1693, RO1694, RO1761, RO1852, RO1908, RO1944, RO1953, RO1967, RO1968, RO1980, RO1990, RO1991	capacity that is never properly utilised. The EVA's comment as having a limited impact on overall viability is unsound. It is further considered unreasonable to require residential developments to provide electric vehicle charging points as the UK is still very uncertain due to the expense of cars in the first instance. It is considered that the assumed cost of installing charging points is flawed and unrealistic.	Further details will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document.
		HE has stated that a requirement for Travel Plans for each development site should be set out in Policy LPA07 due to their inherent ability to mitigate the traffic impacts of development on both the local and strategic road network.	Paragraph 4 has been updated accordingly. MODIFICATION No. AM040
		The policy should acknowledge cross-boundary connections with Wigan in terms of sustainable forms of travel. Supports paragraph 1 criteria e) i), and iii) in terms of rail. Paragraph 5 is supported but notes that the A579 Winwick Road is not marked on the Policies Map as 'non-freight'. Freight traffic from Parkside must be directed to Junction 22 of the M6 and not be permitted to go northwards on the A579 Winwick Lane.	The Parkside link road scheme (reference P/2018/0249/FUL) has now been called in by the Secretary of State, having been assessed through the planning application process. LPSP policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. The proposed Parkside link road will help address the potential for local congestion as a result of development at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
		HE has states that the policy and Plan should make it evidently clear to developers that any alterations to the Strategic Road Network are taken as a last resort and, if required, should be clearly demonstrated through the following initial two stages: Avoidance and Off-Line improvements.	Paragraph 6 has been amended accordingly in the interests of clarity and to accord with the comments of HE. MODIFICATION No. AM041
		The HBF and other developers are concerned that paragraph 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document. They do not consider that this approach is appropriate. The HBF consider that these elements should be set out in policy and open for debate at the EiP, without these details it is impossible to consider the impact of these policies	Comments noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		on viability or whether they are justified and effective. Further clarification is required for development that comes forward in the interim.	
		HE has stated that the Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with themselves and the wider LCR.	A new paragraph will be incorporated into the reasoned justification to include reference to the proposed major road network in line with the comments of HE. MODIFICATION No. AM042
		Objects to the policy wording and seeks the strengthening of the policy to require that all new development be focused around integrated transport hubs where access to public transport and walking and cycling can be facilitated. Developments should make financial contributions towards public transport improvements to the benefit of existing and new residents.	The IDP sets out the key infrastructure requirements necessary for development to take place. Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements. Policies LPA02 (clauses 5 and 9) and LPA07 address the issue of sustainable transport links. <i>Policy LPA02 states that “high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”.</i>
		Parr Street, St Helens, Network Rail would like to see this land used for housing rather than protected for future re-use, as this aspiration is based on outdated policy.	Part of this site is acknowledged on the Council's Brownfield Register (Ref: BR016).
		Policy should insist that new development be reliant on public transport and discourage motor-based development. Current investment in public transport is woefully inadequate. New development should be focused around integrated transport hubs where access to public transport and walking and cycling can be facilitated. Given that 26.7% of residents do not have access to a car, it is imperative that places are better connected.	Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that <i>“high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”;</i>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		The Council has failed to deliver a rail connection from the Town Centre to Manchester. It has also failed to develop a station at Carr Mill. There are almost no bus services along the A58 to access sites. The Plan has failed to secure significant improvements to public transport with no clear strategy. The Plan does not contain a clear policy for highway improvements close to proposed development sites. There are numerous highway improvements required along the A58 and A580.	Both the rail connection from St Helens Junction and St Helens Central, and a new train station at Carr Mill, are still considered options for the Council. The specifics of some infrastructure, understandably, cannot be identified at this stage. However, the IDP is considered a living document and will be updated accordingly.
Policy LPA08: Infrastructure Delivery and Funding	RO0039, RO0110, RO0146, RO0209, RO0276, RO0326, RO0327, RO0375, RO0461, RO0472, RO0543, RO0620, RO0621, RO0656, RO0657, RO0665, RO0731, RO0759, RO0849, RO0850, RO0851, RO0960, RO0961, RO1046, RO1059, RO1111, RO1138, RO1145, RO1154, RO1159, RO1178, RO1179, RO1184, RO1321, RO1322, RO1364, RO1365, RO1514, RO1634, RO1917, RO1944, RO1952, RO1953, RO1980, RO1990	Supports policy as it allows viability assessments to be submitted with planning applications to establish the required level of developer contributions.	Support noted.
		Support this policy, which further elaborates the protection and support for valued facilities building on earlier policies LPA03 and LPA04.	Support noted.
		The additional clarity and flexibility introduced within the policy is welcomed, but the Plan must ensure that it does not impose requirements that could render schemes unviable.	Comments noted.
		Supports Policy concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out in the NPPF, and also that the extent of obligations sought does not threaten the viability of sites.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.
		Paragraph 2, criterion b), there is a mechanism for the pooling of contributions for wider infrastructure delivery through CIL charging, but this does not appear to be something that is being considered for St Helens. In that regard, it is unnecessary to make reference to CIL Charging in the Plan unless there is an intention to utilise such measures.	St Helens Council does not currently have plans to introduce a CIL for the Borough. This approach reflects the evidence which it has concerning development viability in the Borough and the availability of other means (primarily Section 106 (S106) obligations to obtain developer contributions in appropriate cases. Policy LPA08 is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			relevant statutory tests and national policy concerning developer contributions.
		Paragraph 2 would allow for S106 contributions to be required to meet the needs of a wider area. Such contributions would fail the tests of the NPPF and CIL Regulations for developer contributions.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.
		Objects to paragraphs 3 and 4 as they have the potential to delay development significantly, as the provision of some infrastructure may require contributions from multiple sources both in the private and public sector.	This approach is considered sound and is aligned with national policies including the NPPF (2019).
		It is considered unnecessary to set out the hierarchy approach in paragraph 6, because any required financial contributions can be dealt with by way of a negotiated S106 contribution; with such a sequential approach to those negotiations being unnecessary.	Comment noted. However, this policy is considered sufficiently flexible to deal with specific cases.
		Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations. Where proposals are likely to increase footfall and the need for car parking at Railway stations the Council should include developer contributions to provide funding for such enhancements.	Comment noted. This would be assessed at planning application and covered in the proposed Transport Assessment.
		The significant additional infrastructure and other works bringing forward brownfield sites such as site 6HA should be explicitly reflected in LPA08 and LPC02, along with the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions. The Council do not consider it necessary to refer to specific sites within these policies. More prescribed requirements are set out in Appendix 5 under the relevant site profile.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Policy wording needs to be clarified as it does not make sufficiently clear the circumstances in which certain contributions will be sought.	Paragraph 2 specifically sets out when developer contributions would be required.
		The Policy accords with national policy, however Appendix 2 is a Council wish list, with no evidence or formula provided how the contribution will be calculated, greater clarity, and evidence on what is actually required and the contributions this is likely to entail.	Appendix 2 is not a 'wish list' but simply a list of categories that infrastructure covers.
		The Plan's approach to obligations to make a development acceptable in planning terms is acceptable. The NPPF states that planning obligations should only be sought where they meet all of a number of tests. On sites of challenging viability, a balance has to be found between the need for scheme delivery in the face of challenging viability and the requirement for planning obligations.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.
		The Plan must ensure that it does not impose requirements that could render schemes unviable. The precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis is not clear and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.	St Helens Council does not currently have plans to introduce a CIL for the Borough. However, should the Council choose to introduce one, then this would be covered in a five-year Local Plan review.
		Any requirement for financial contributions must be fully justified and based on credible and robust evidence identifying an actual need. Any financial contributions sought should meet the tests as set out in the CIL Regulations and the Framework. Additional work needs to be carried out in the EVA to justify the policy threshold.	Comment noted. The developer contributions requirements set by Policy LPA08 will be subject to the statutory tests including being necessary to make the development acceptable.
		The Plan must ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities.	Comment noted. However, this policy is considered sufficiently flexible to deal with specific cases.
		The IDP does not provide clarity on likely costs, with no site-specific requirements.	The specifics of some infrastructure, understandably, cannot be identified at this stage. However, the IDP is considered a living document and will be updated accordingly.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy LPA09: Green Infrastructure	RO0150, RO0375, RO0660, RO0675, RO0875, RO1058, RO1111, RO1154, RO1244, RO1574, RO1634, RO1788	The Canal & River Trust support the thrust of this policy. Although the policy does not specifically mention the canal, it is noted that the supporting policy justification mentions about developing the Sankey canal corridor as a multifunctional green corridor. We support this aim, pending any long-term ambitions of the Sankey Canal Partnership to see the canal restored.	Support noted.
		Support this policy.	Support noted.
		Supports policy and notes the encouragement given to development proposals that will enhance the Green Infrastructure network.	Support noted.
		The text should be wider than only referencing the Sankey catchment, e.g. Penketh Brook.	Comment noted; however, the current wording of the policy is considered flexible and robust, and therefore no change is proposed.
		Paragraph 4 states that proposed development resulting in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure.	Comments noted. However, the Council consider the policy to be flexible and in line with national policy. Paragraph 4 provides a number of exceptions when this could be considered acceptable; and the scope for compensatory provision in appropriate cases is extensively covered in various parts of the Plan including policies: LPC05: Open Space and Outdoor Sports Facilities LPC06: Biodiversity and Geodiversity LPC08: Ecological Network LPC09: Landscape Protection and Enhancement; and LPC10: Trees and Woodlands
		Paragraph 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the Council's evidence base. The Council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the Council's open space study 2016 concluded that there is sufficient quantity of open space. As Green Infrastructure includes playing fields it is important that this	Comments noted. The 2016 Open Space study concluded that in overall terms there is sufficient quantity of open space within the Borough. However, there are areas of deficiencies. The LPSP should be read as a whole, with Policy LPC05 clearly setting out in paragraph 7.3.3 what is meant by open spaces.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		policy and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.	
		Objectives within the BFPAAP state that development that will result in the loss, fragmentation or isolation of green infrastructure assets will be refused. The policy puts a burden on developers to ensure sites incorporate holistic green infrastructure. It does not state how this will be met or measured, with no reference to the BFPAAP.	The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.
		Policy must not designate equal importance to all green areas. It is vital that both plan-making and decision-making have regard to evidence relating to the amenity and ecological value of Green Infrastructure. Not all Green Infrastructure will be of equal value and indeed worthy of the same mechanisms of protection as other sites.	LPSD Policy LPA09 is aligned with national policies especially Para.96 of the NPPF.
		Acknowledge the importance of Green Infrastructure, but its provision must not result in the loss of developable areas of sites. Any funding required as compensation has to comply with CIL regulations.	Comment noted.
		Objects to loss of Green Belt in the context of this policy which seeks to protect Green Infrastructure from undue harm from development and seeks to ensure that new developments, where justified, support Green Infrastructure.	Comment noted.
Policy LPA10: Parkside East	RO0136, RO0157, RO0190, RO0245, RO0326, RO0502, RO0692, RO0843, RO0918, RO1430, RO1777, RO1777, RO1809, RO1940, RO1963	Strong support for the proposed allocation of this site and the key findings of the evidence base. The provision of a SRFI provides for something unique for the area. 7EA cannot be replicated at other sites in St Helens, including brownfield sites. Development of the site will also support the ambitions of the LCR (and St Helen's Council) to bring significant investment and employment opportunities to the region. However, although generally supportive of the policy, which is considered sound, a minor modification is suggested which will ensure the policy is fully justified and consistent with national policy by removing the text ' <i>...on at least 60 hectares of the site...</i> ' in paragraph 2, criterion b), part (ii).	Support welcomed. However, the text is considered sound and reasonable and therefore will not be amended.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Object to any development that would allow and load additional freight traffic onto the M6 via Junction 23.	Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
		Policy makes no reference to air quality or noise. The policy would benefit from the additional wording similar to that applying to Parkside West, i.e., "Suitable measures must be included to control the impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area." The requirement for advanced strategic landscaping should also be added to the policy.	Commented noted. The LPSD should be read as a whole. Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
		The justification for this site's removal is weak. Presently rail is not sufficiently attractive to logistics and this is unlikely to change. The region already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. It is not evident how this rail link will be funded.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this.
		Feasibility work would be required to determine the potential of such a development, and to understand the availability of space to run freight in this already heavily congested area of the network.	Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Whilst supportive of a SRFI concerned that the scheme could become a site for B2/B8 uses which are dependent upon road served freight.	Policy LPA10 recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement.
		Highway and local traffic concern in terms of additional heavy vehicle goods and the potential for impacts upon air quality, noise and visual amenity for local residents in Newton-le-Willows, and Wigan Borough.	Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
		Objects to extent of 7EA on the proposals maps which shows the depicted route of rail freight on site 8EA and the area calculation (5.58ha) for the rail freight route.	The alignment of land in Parkside West to provide a future siding for the rail uses in the Parkside East site is informed by relevant technical evidence. Therefore, no changes in this alignment are considered necessary.
		Concerned that the protection afforded Parkside West (site 8EA) in the Core Strategy has been disregarded in the allocation of the land site 7EA within the Plan.	Policies LPA04, LPA04.1 and Appendix 5 set out the site-specific requirements for site 8EA. There is insufficient land within the current urban areas of the Borough to provide for its future employment land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
		Concerned that the biodiversity value of the allocations at 7EA and 8EA have been overlooked. There has been a lot of work in recent years rehydrating the moss and improving the natural habitat. Any development near the Moss will have a direct impact on the moss land and the birds and animals that live there and should be	Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife. Impacts on heritage assets will be minimised through policies LPA04.1, LPA10 and LPC11. Heritage impacts have also been

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		preserved for future generations. Furthermore, there are listed buildings on the site that would require demolition.	considered in the HIA of site 7EA & 8EA in the Heritage Background Paper submitted alongside the LPSD.
		St Helens has so far not been able to find a company prepared to build and operate out of a SRFI terminal and this land should not be released only to be used for even more warehousing.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this.
		There is little justification for the need for this site for employment use given that St Helens does not have sufficient people of working age to justify the 215ha of land released from the Green Belt for employment use. As such there are no special circumstances for the land to be released from the Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future employment land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the GBR (2018), there are considered to be exceptional circumstances that justify the release of employment sites from the Green Belt. The employment land requirement is supported by robust evidence as set out in the LPSD and the Employment Land Needs Study (2019).
		PAG Comments: The Council's involvement in the Parkside Regeneration Joint Venture undermines public confidence in the impartiality of the planning authority in relation to the Local Plan and the two current Parkside planning applications. The opportunity for fair and unbiased consideration for local community and environmental impacts is perceived to be almost non-existent.	It is appropriate to reference live planning applications in the Plan, as these are relevant to the current status of proposed development sites and their deliverability. If these applications change or proposed development does not come forward in the future, references to such planning applications can be updated at a later date at a Local Plan Review stage. All of the consultation responses the Council have received during the Local Plan preparation process have been carefully considered by the Council.
		Concerned that Policy does not offer enough protection for the environment and impacts to the local community. The conditions specified in Core Strategy Policy CAS 3.2 have been removed which PAG strongly disagree with, particularly in relation to conditions concerning local roads, air quality, and heritage.	Impacts on heritage assets will be minimised through policies LPA04.1, LPA10 and LPC11. Heritage impacts have also been considered in the HIA of the sites 7EA and 8EA in the Heritage Background Paper submitted alongside the LPSD. LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the potential issues of air quality and traffic from sites 7EA and 8EA. The potential impact of sites 7EA and 8EA on the local road network has been considered in the Local Plan Transport Impact Assessment 2018. In addition, the proposed Parkside

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			link road will help address the potential for local congestion at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
		The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. Concerned that the Local Plan allocated Parkside West as employment land rather than being set aside for use as a SRFI. In doing so the capability for rail freight and inter model operation has in effect been at least halved. If we are to believe previous strategic documents, policies and planning decisions on this matter, Parkside as a location is of national importance and the land should be safeguarded.	The LPSD policy approach to the Parkside site (contained within policies LPA4.01, LPA10 and Appendix 5) is informed by the Parkside Logistics and Rail Freight Interchange Study (2016). This study concluded that the Parkside site could support a medium (8 trains per day) to large scale (12 trains a day) SRFI development by utilisation of both the east and west parts of the site. The Study indicated that the eastern side could be used for the core rail freight terminal or additional intermodal sidings and concluded that is fundamental to the delivery of a viable SRFI, that land on the west and east sides of the M6 is included for future development. The Study envisaged a scenario, whereas a first phase, development would commence on the western side accessed by road, with subsequent phases having to have rail access. As evidenced in the Study, at 124.55 ha in size Parkside East (alongside the 5.58ha of land at Parkside West to facilitate the provision of rail access to the site from the north) is large enough to deliver a large scale SRFI. The parts of the western site which are not directly required to provide rail or road infrastructure, or landscaping will also make an important contribution to meeting needs for employment development.
		The drive for additional revenue from business rates appears to exceed all other national strategic and local environmental considerations. The revised ELNS attempts but fails miserably to explain excessive employment needs forecasts to justify the need to remove Parkside from Green Belt. The ELNS makes huge assumptions that are bordering on being fictitious and these do not meet the 'special circumstances' requirements for release of Green Belt. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future employment land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the GBR (2018) and Policy LPA10, there are considered to be exceptional circumstances that justify the release of sites 7EA and 8EA from the Green Belt.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		The GBR (2018) recognises the value of Parkside East as Green Belt, stating 'Parcel GBP_039 (Parkside East) continues to make a strong contribution to the purposes of Green Belt land.' A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.	The LPSD policy approach to the Parkside site (contained within policies LPA4.01, LPA10 and Appendix 5) is informed by the Parkside Logistics and Rail Freight Interchange Study (2016). This study concluded that the Parkside site could support a medium (8 trains per day) to large scale SRFI development (12 trains a day) by utilisation of both the east and west parts of the site. The Study indicated that the eastern side could be used for the core rail freight terminal or additional intermodal sidings and concluded that is fundamental to the delivery of a viable SRFI, that land on the west and east sides of the M6 is included for future development. Without the release of land to the east and west, the market attractiveness, operational efficiency and financial viability of a SRFI will be adversely affected.
		The Draft Submission lays out conditions of use for Parkside East in Policy LPA10. Para 4.36.6 states 'The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres).' As we have pointed out many times before such statistics do not differentiate bulk e.g. aggregates vs non-bulk freight. Parkside would not have any bulk capability typically therefore quoting such figures is erroneous and misleading.	The LPSD policy approach to the Parkside site (contained within policies LPA4.01, LPA10 and Appendix 5) is informed by the Parkside Logistics and Rail Freight Interchange Study (2016). As part of the stakeholder engagement for the Study, the potential for the site to be used for bulk rail freight movements was highlighted. It was suggested that a possible bulk movement could be to/from one of the ports in the north. Similar movements that have proved to be economically viable were outlined by stakeholders. Ultimately freight movements at the Parkside site will be informed by market demand when the site comes forward for development.
		Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment.	Any potential impacts from development will be minimised through relevant LPSD policies including policies LPA07, LPA08, LPA11, LPC06 and LPD09.
		Phase 1 Phase 2 and the Parkside Link Road application are all part of a nationally significant Infrastructure Project.	If a nationally significant SRFI proposal (as defined by the Planning Act 2008 - the threshold for a rail freight interchange scheme to be considered nationally significant is 60 ha in area

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			and have the capacity to handle at least four goods trains a day), comes forward on the Parkside site, it would be examined by the Planning Inspectorate. The parts of the western site (8EA) which are not directly required to provide rail or road infrastructure, or landscaping will also make an important contribution to meeting needs for employment development.
		The site contains important wildlife and woodland, the loss of which cannot be mitigated. The meadows have taken decades to mature and are unique in the area. The SSI Highfield Moss is adjacent to the site and is highly sensitive to increase in pollution and ground water levels. The reliance on logistics is flawed. Warehousing is increasingly automated, so job predictions are flawed.	The potential impact on the SSSI has been considered as part of planning application P/2018/0048/OUP. The conclusion of which was that the information submitted confirmed that there would be no adverse impacts upon the Highfield Moss SSSI as a result of the proposed development.
		Too much development is focused near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick.	Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The sites identified for development have been objectively assessed as being the best that are available to meet the Borough's housing and employment land needs.
		The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	Any potential impacts on the community and environment will be minimised through LPSD policies LPA04.1, LPA02, LPA07, LPA08, LPA10, LPC11 and LPD09.
		NPPF Para 15 says that succinct and up-to-date plans should provide a... platform for local people to shape their surroundings. This means that when a plan has been found sound it is then up to the "Local People" who must approve after the inspector's report and not the local planning authorities as paragraph 15 does not mention local planning authorities. This also indicates the Local People as	Comment noted. However, the Local Plan adoption process has to accord with the Planning and Compulsory Purchase Act 2004 (as amended) and Regulation 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		decision-takers by default and it is to the Local People who must also adjudicate decisions and not just the LPA at the decision stage.	
		The registered battlefield is seen as an irreplaceable designated heritage asset for existing and future generations to enjoy.	Policy LPC11 will help ensure that any potential heritage impacts are minimised, and appropriate mitigation measures are introduced. As part of planning application P/2018/0048/OUP, Historic England has re-iterated its opinion that although the proposals will cause harm to the northern part of the designated battlefield, because of the previous recent use of the application site and the impact this has had on the archaeological integrity of the site, Historic England does not consider that the harm amounts to substantial harm, as defined in the NPPF (paragraphs 132 and 133), when considered in the context of the registered battlefield as a whole
		St Helens Council and as a joint owner/developer of the Parkside site knowingly have declared that the whole project is of national significance in their IDP and LPPO, thus making the Parkside site a National Significant Infrastructure Project (NSIP) and have knowingly split the project into smaller developments. Parkside as a whole project must be considered by the Major Infrastructure Unit of the Planning Inspectorate.	If a nationally significant SRFI proposal (as defined by the Planning Act 2008 - the threshold for a rail freight interchange scheme to be considered nationally significant is 60 ha in area and have the capacity to handle at least four goods trains a day), comes forward on the Parkside site, it would be examined by the Planning Inspectorate. The Planning Inspectorate will then make a recommendation to the relevant Secretary of State, who will make the decision on whether to grant or to refuse development consent.
		There is uncertainty about the site sizes of Parkside East and West as the Phase 1 planning application (Parkside West), Core Strategy, LPSP and the GBR (2018) quote different site sizes. Consequently, the submitted Green Belt document(s) are incorrect and legally not compliant.	The gross site areas of sites 7EA and 8EA are identified in Policy LPA04 table 4.1 (footnote 17 and 18). Appendix 5 of the LPSP shows the notional capacity of the sites (the net developable areas).
		The Council's proposals for B8 development will have an unmeasurable impact on air quality on the local road network and cause congestion throughout St Helens, Warrington and Wigan.	LPSP policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. The impact of employment development on the local road network has been

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			considered in the Local Plan Transport Impact Assessment 2018. The proposed Parkside link road will help address the potential for local congestion as a result of employment land development at sites 7EA and 8EA by providing a direct link to junction 22 of the M6.
		All previous proposed developers of the Parkside site have all failed to solve the road transport problem access to Parkside and the direct access to the motorway network. The proposed Parkside Link Road is an indirect access to the Motorway M6 which does not comply with Core Strategy Policy CAS 3.2 point 1. The route of the A573 is a tight S-bend where on a regular basis even one HGV sometimes gets stuck due to the on-coming cars. This will become a point of concern if the link road is allowed to use the A573/M6 Bridge while the access to Hermitage Green remains open to all traffic to use the A573/M6 Bridge. The resultant commercial traffic from Parkside will impact the local roads with congestion, air pollution and continual noise on a 24/7/365 basis.	The Parkside link road scheme (reference P/2018/0249/FUL) has been called in by the Secretary of State, having been assessed through the planning application process. LPSP policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. The proposed Parkside link road will help address the potential for local congestion as a result of development at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
		In the previous reports the developer of Liverpool 2 deep water terminal stated that Parkside was not a part of their strategy and made a suggestion for Parkside to get containers from the South of England. Further the developer of the Liverpool 2 Deep Water terminal is on record of succouring the available Rail Route on the Chat Moss Railway Line for their needs between Liverpool and Manchester and other connections.	As evidenced in the Parkside Logistics and Rail Freight Interchange Study (2016), the opportunities for rail access from the Parkside site are considered to be second to none in the North West. Train movements to/from the north, south, east and west can be catered for at the site meaning that Parkside will not be reliant on freight from Liverpool 2, it will be attractive to a number of freight movements from all directions including from the southern ports.
		The reducing of carbon emissions using freight for road to rail and purposed built SRFI and warehouse complex is looking at least 2055 to become eCO2 neutral before any savings to meet climate change targets. This does not even take in to account the Governments recently published on the 13 January 2019, "The Clean Air Strategy 2019". The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in	Comment noted. LPSP policies LPA02, LPA07, LPA10 and LPD09 seek to address the potential issues of air quality and traffic from sites 7EA and 8EA.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate.	
		As there is no policy for 8EA then the policy for 8EA is Core Strategy Policy CAS 3.2 and as 8EA has no SRFI fully developed, then this does not comply with CAS 3.2. In fact, neither sites 7EA nor 8EA comply with the exceptional circumstances required in Policy CAS 3.2.	Policies LPA04, LPA04.1 and Appendix 5 set out the site-specific requirements for site 8EA. There is insufficient land within the current urban areas of the Borough to provide for its future employment land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the GBR (2018) and Policy LPA10, there are considered to be exceptional circumstances that justify the release of sites 7EA and 8EA from the Green Belt.
Policy LPA11: Health and Wellbeing	RO0656, RO0657, RO0883, RO1111, RO1154, RO1676, RO1947	Support the aims of the policy but consider the policy is unsound and not justified. The policy is inconsistent, discriminatory and disproportionate. Examination of other plans has found similar policy approaches to be unsound. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the NPPF. Paragraph 4 specifically singles out hot food takeaways.	The approach taken in this policy is considered positive and in line with Chapter 8 of the NPPF, which states that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, including access to healthier food. The policy and criteria concerning the location of hot food uses are considered to be justified on the basis of evidence, and in order to promote healthy eating habits and reduce the rate of childhood obesity. The policy does not contain a blanket ban or exclusion zone for A5 uses.
		National policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Guiding the location of hot food takeaways is in direct conflict with the NPPF.	As above.
		Consider the requirement to achieve “affordable warmth” to be onerous, and suggest it is further explained in the text.	It is clear that the Government expect Local Authorities to play an increasingly important role in delivery of energy efficiency programmes through local knowledge. St Helens Council is committed to improving the quality of life and securing prosperous and sustainable communities for its residents. Local residents face a wide range of health and wellbeing

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			issues, with many families on low incomes living in cold, damp homes and the elderly struggling to heat just one room in winter. This policy will help enable the Council address these health and wellbeing related issues within the Borough.
		No evidence has been provided to justify this policy.	Numbers of obese and overweight children is significantly higher in the Borough is significantly higher than those in the North West and England. This evidenced by the National Child Measurement Programme (NHS Digital).
Chapter 5: Area Policies			
Policy LPB01: St Helens Town Centre and Central Spatial Area	RO0150, RO1058, RO1942	Supports the Local Plan in respect of the approach to St Helens Town Centre and the Central Spatial Area. Network Space supports the inclusion of their land within the Central Spatial Area which allows for a range of uses subject to the appropriate justification.	Support noted.
		The Canal & River Trust support the thrust of this policy and in particular criteria 7 which links in with Policy LPA09.	Support noted.
		Concerned that paragraph 5.3.7 is proposing to provide new retail and leisure space when there are already 15.8% units vacant, and questions whether any new space is actually required. Objects to the use of Council Tax money to deliver new retail floorspace given that such resources should be used for education, health, roads, environmental cleanliness, and police.	The Council's Town Centre Strategy (October, 2017) sets out aspirations for the future of St Helens town Centre. The LPSD is aligned with this Strategy which will enable the implementation of its recommendations including the identification of potential redevelopment opportunity areas to revitalise and enhance the Town Centre's retail and leisure offer.
Policy LPB02: Earlestown Town Centre	-	-	-
Chapter 6: Homes and Communities			

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy LPC01: Housing Mix	RO0159, RO0225, RO0375, RO0565, RO0574, RO0732, RO1116, RO1145, RO1154, RO1239, RO1244, RO1634, RO1692, RO1693, RO1694, RO1944, RO1948, RO1951, RO1952, RO1953, RO1960, RO1960, RO1960, RO1967, RO1968, RO1980	<p>The HBF and a number of developers consider this policy is not sound, justified, effective or consistent with national policy and object to the policy for the following reasons:</p> <p>Generally supportive of paragraph 1, however, it is important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements. Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a "one size fits all" approach. The HBF recommends a flexible approach is taken regarding housing mix.</p>	Comments noted. However, the Council consider the policy to be flexible and in line with national policy.
		Objections raised to paragraph 2, criteria a) & b), on the grounds that if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes, then the Council should only do so by applying the criteria set out in the PPG, which we believe the Council have failed to do. The SHMA Update does provide some limited evidence in relation to the likely future need for housing for older and disabled people, however, this alone does not justify the use of optional building regulations. The viability aspect has not been properly assessed which could undermine the deliverability of some sites.	The targets set are considered justified by evidence and are consistent with national policy. Paragraph 4 states that exceptions to these requirements may be made where the applicant has submitted an independent viability assessment. In such cases the Council will weigh any benefits of allowing the scheme in the form submitted against the extent of any failure to meet the requirements in full.
		The Council's EVA indicates that such a requirement would not be viable on a number of sites.	The EVA concludes that ' <i>Only 3 of the 13 viable results are made unviable by the inclusion of this additional requirement and even then the level of deficit is not significant</i> '.
		If the Council can provide the appropriate evidence and paragraph 2 is to be included, then the HBF recommend that an appropriate transition period is included within the policy.	The policy has been subject to an EVA the conclusions of which are above. The Council consider it inappropriate and impractical to introduce a transition period for this policy. Given that paragraph 4 provides an exception to this requirement if a site is unviable.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Object to paragraph 3 and requirement for the provision of 5% bungalows on greenfield sites. This cannot be justified given its blanket requirement without consideration of local factors including need, proven demand and viability. There is no planning reason or statistical evidence for such an imposition and that the market should be allowed to determine the mix of housing on any site. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows. Bungalows are land hungry by their very nature and do not, therefore, accord with Government policy in respect of density and making efficient use of land. The requirement to provide bungalows is primarily driven by an ageing population.	The requirement for bungalows responds to evidence of demand in the Mid Mersey SHMA (2016) and the St Helens SHMA update 2018.
		The HBF support paragraph 4 as it provides a viability clause and flexibility to deal with site specific circumstances. The inclusion of this part of the policy should not, however, be used to justify other unsustainable requirements as already stated.	Comment noted.
		Object to paragraph 6 as limited evidence has been provided to justify a demand for such a requirement. It is not considered that self-build and custom-build should be required on large scale strategic sites, which are generally brought forward in accordance with a comprehensive masterplan.	Comment noted. The policy is not requesting that self-build and custom-build schemes should be required on large scale strategic sites. The policy is positively prepared in that it makes provision for such schemes should they come forward and conform with relevant policy, both local and national.
		The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). The wording of the policy refers to the 'latest' SHMA, suggesting the policy requirement could change over time, without being tested through the development plan process. Regarding housing mix there is insufficient assessment of market demand. By failing to adequately account for demand additional pressures will be placed upon the housing market.	The policy is considered flexible and does not prescribe specific numbers as these will change overtime. 'Relevant evidence' simply refers to future evidence that may come forward that informs housing types, tenures and sizes of homes. This could include housing waiting lists that highlight deficiencies in certain housing types and tenures.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		There is no specific target for special needs/elderly housing provided within the policy.	To apply a prescribed provision would restrict the flexibility of the policy, as need continuously changes. It is therefore considered that the policy as worded is justified and robust.
Table 6.1	-	-	-
Table 6.2	-	-	-
Policy LPC02: Affordable Housing	RO0098, RO0159, RO0375, RO0543, RO0665, RO0732, RO1145, RO1154, RO1244, RO1634, RO1944, RO1948, RO1951, RO1952, RO1953, RO1960, RO1967, RO1968	Supports the policy and the provision of new housing to meet the needs of the whole community, which clearly accords with the aims and objectives of the Plan as well as the thrust of national policy.	Support noted.
		Supports the principle of having policies to manage the housing mix and the provision of affordable housing within new developments. However, this policy should be amended so it is flexible enough to acknowledge that the different scale, characteristics and density will vary from site to site.	The policy introduces a zonal approach, as a result of EVA testing. Paragraph 4 states ' <i>The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development.</i> ' Any relaxation of these requirements should be supported by a site-specific viability appraisal and the benefits of the development outweigh the failure to provide the affordable housing contribution.
		Supports paragraph 1, however the policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.	Comment noted. Policy LPC02 has to be evidenced based, taking into account viability considerations. The evidence has justified the policy accordingly.
		Supports the zone-based approach to the assessment and delivery of affordable housing and also the distinction between the proportions of affordable housing required on greenfield and brownfield sites in paragraph 2.	Support noted.
		The HBF does not consider the policy is sound, as it is not justified or consistent with national policy. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account	Please see Appendices 21 & 22, for the full response made by Keppie Massie.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		of need but also viability. The Council will need to confirm that this policy is viable, through its evidence. It is noted in the EVA that there are issues with the viability, for example with greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. It is noted that one site remains unviable at 35dph, with the others having very narrow margins of viability and when consideration is given to not only the 30% affordable housing requirement but also to the cumulative impacts of the policies within the Plan the situation is worse.	
		The EVA identifies that emerging greenfield housing allocations are viable at 30dph with 30% affordable housing; however, Table 6.10 indicates that 'generic' greenfield sites are largely unviable when applying the same density and affordable housing requirement. As Table 4.6 of the Plan identifies that a significant proportion of the housing requirement is to be met on other sites identified in the SHLAA, of which a proportion will be greenfield sites within Zone 2, a 30% affordable housing requirement will have significant implications on viability of these sites, and therefore the ability of the Plan to achieve the housing requirement. An element of flexibility in applying affordable housing requirement should be retained to ensure that the Plan's housing sites can be delivered viably and that the scale of development proposed in the Plan is not threatened.	The requirements set in the LPSD are considered justified by evidence and are consistent with national policy. The policies include adequate exceptions to afford flexibility to avoid impacts on viability and are therefore considered robust and consistent with national policy.
		Broadly support and endorse the flexibility of this policy, however, questions why the policy differentiates between Zone 2 and 3 at all especially when the policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the policy to be simplified.	The Council's approach to this point is informed by its viability evidence. Areas within Zone 2 have a 0% requirement on brownfield sites for affordable housing; whereas areas within Zone 3 have a 10% requirement on brownfield sites for affordable housing.
		Considers that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.	This is all set out in the EVA, which shows that there are geographical disparities in viability, and this has informed the zonal approach proposed.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Generally supportive of the provision of 30% affordable housing. However, it remains unclear as to how the percentage of affordable housing provision required has been arrived at. How the overall level of affordable housing that it is expected will be achieved; and whether the policy will be effective in meeting the needs for affordable housing in the Borough.	Affordable housing requirements are informed by evidence in the SHMA Update 2018 and the EVA (2018). The achievement of affordable housing numbers is expected to come through the adoption of these policies, and their effectiveness will be considered through the monitoring of the Plan.
		Concerned that the viability evidence is not supporting the policy requirements for affordable housing provision. In particular Zone 2 does not appear viable at the set level of affordable housing provision.	It is not possible to accurately predict the exact balance of housing development that will take place across the defined zones over the Plan period, nor the resultant density. That being the case, it is considered reasonable to set out the proportion of dwellings brought forward for implementation that are to be affordable. Paragraph 4 provides policy flexibility in circumstances where site viability is affected.
		Supports the amendment of paragraph 3 (via footnote) to include provision of Starter Homes.	Support noted.
		Objects to paragraph 3, which is overly restrictive in relation to the type and tenure of affordable housing that is to be provided and does not necessarily reflect the need for affordable housing, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.	This approach is considered in line with the NPPF, which states in paragraph 64, that ' <i>where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership</i> ', as part of the overall affordable housing contribution from the site. In assessing the precise types of affordable housing to be provided on each site, the Council will take into account the SHMA, any evidence of need and the latest definition of affordable housing set by the Government. It is anticipated that there will be an on-going need for affordable rented housing as other forms of affordable home ownership are unlikely to replace the need for these forms of rented accommodation.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			Paragraph 4 provides policy flexibility in circumstances where site viability is affected and as such the full affordable housing requirement cannot be met.
		Supports the caveat in paragraph 4 that allows for viability assessments to be submitted to justify a relaxation of affordable housing provision.	Support noted.
		It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements of Policy LPA05. It is important that seeking of planning obligations, including affordable housing, does not hinder the delivery of sites. The policy should ensure that such obligations do not threaten the viability of the sites and the scale of development identified in the Plan.	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.
		Rainford falls within Affordable Housing Zone 3 in the Plan, policy stipulates that greenfield sites should provide 30% of the total number of new dwellings as affordable housing, with brownfield sites providing 10% affordable housing. This approach assumes that brownfield sites have more potential viability issues than greenfield sites. This is not always the case, and there does not appear to be robust evidence to support a different affordable housing requirement for brownfield and greenfield sites. Although paragraph 4 allows for the requirement to vary on a site-by-site basis, this is an inequitable position and adds to the cost burden of bringing forward greenfield sites for development.	Comment noted. The disparities in affordable provision on greenfield and brownfield land are due to viability differences, and this is supported by evidence contained in the EVA. If a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.
		A policy mechanism should be established so that should an over provision of affordable housing in the borough be demonstrated, a lower requirement would be sought on new greenfield developments.	Comment noted. This is not considered necessary.
		Whilst broadly supportive of the need to provide affordable housing, is concerned about the lack of evidence on viability issues.	Comment noted. Where a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			through a robustly prepared, transparent and independent financial appraisal.
		The level of affordable housing a site can deliver should be supported by robust and up to date evidence.	The Plan is informed by an up to date viability report.
		Concerned that the overall need for affordable housing is demonstrated to be increasing (the 2019 SHMA indicated that 117 affordable units were needed per annum as opposed to 96 per annum in 2016). It is concerning that whilst affordable housing needs have increased by 22% that the housing provision in the Plan has been reduced by 15% suggesting that the Plan is not providing sufficient support for affordable housing.	<p>The proposed housing requirement of 486 dpa is above the standard method which is intended to address affordable housing need by making housing more affordable thus reducing the need. Using the long-standing definition of affordable housing need (i.e. those who cannot afford to access market property) the 2019 SHMA identifies a need for 117 affordable homes per annum. This represents a slight improvement from the Mid-Mersey SHMA (2016). While the affordable housing need is falling this identified level of need notionally represents about 20% and 30% of all housing required in the Borough.</p> <p>It should also be noted that the more recent 2018 affordability ratio shows an improvement from the previous year. The standard method will also fall next year as the base period moves from 2019-29 to 2020-30.</p> <p>In addition, as there is insufficient land within the current urban areas of the Borough to meet the Borough's objectively assessed housing needs, some Green Belt release is required. Therefore, a balance needs to be met against the need to retain Green Belt land within the Borough and the proposed housing requirement.</p>
		Due to viability a number of allocated sites within the Plan will not be providing affordable housing, and therefore the Council's affordable housing need will not be met, and therefore the Council should consider an increase in the housing requirement.	As above.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Concern over the assessment for calculating affordable housing that has been carried out as part of the SHMA update, it is not clear where this household income increase has come from and it does not align with ONS' Annual Survey of Hours and Earning; and it is unclear whether the report is based on the 2016-Sub-National Household Projections or the 2014-Sub-National Household Projections to inform its estimate of gross household formation.	Table 11 of the SHMA update 2019, sets out the main aspects of analysis and provides a description of the sources used. Key topics for updating are then discussed in subsequent sections. The update has collated income data about local incomes (including information from the Annual Survey of Hours and Earnings (2017) and small area income estimates from the ONS published data in December 2016.
		As St Helens has an affordable housing need of 117dpa, this equates to 24% of the overall housing target, below the 30% target, so does not provide clear evidence for this policy requirement.	Affordable housing requirements are informed by evidence in the SHMA Update 2018 and the EVA (2018). In addition, not every site that will be delivered over the Plan period will add to the overall affordable housing requirement, i.e. sites of 10 or less are not required to deliver affordable housing. Therefore, it is not reasonable to suggest that the Council should only need to ask for 24%, as this calculation is based on every single site delivering 24% of affordable housing to meet the need, which will simply not be achieved.
		The importance of viability assessment at the strategic plan making stage is given heightened significance in the NPPF; it is vital that policies for development contributions should not undermine the deliverability of the Plan.	Comment noted.
		The Reasoned Justification relating to this policy makes little reference to the viability of delivering the affordable housing requirements aside from a mention of the way it has informed the zone by zone approach. A more thorough explanation is needed in the Plan to show the impact on the viability of delivering new housing arising from affordable housing requirements alongside other development contributions.	Comment noted. This is not considered necessary. The Plan must be read as a whole. Policy LPA08 addresses such issues.
		The significant additional infrastructure and other works bringing forward brownfield sites such as 6HA should be explicitly reflected in Policies LPA08 and LPC02, along with the benefit of delivering a	Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		range of tenures, including affordable housing, as part of providing new homes and choice.	clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions. The Council do not consider it necessary to refer to specific sites within these policies. More prescribed requirements are set out in Appendix 5 under the relevant site profile.
Figure 6.1: Affordable Housing Zones	RO1244	Queries why Policy LPC02 differentiates between Affordable Housing Zones 2 and 3, as the Policy's approach to affordable housing delivery within these areas is the same.	The Council's approach to this point is informed by its viability evidence. Areas within Zone 2 have a 0% requirement on brownfield sites for affordable housing; whereas areas within Zone 3 have a 10% requirement on brownfield sites for affordable housing.
Table 6.3	RO0375, RO1944	Broadly support and endorse the flexibility of this policy. Question why the Policy differentiates between Zone 2 and 3 at all especially when the policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the policy to be simplified. A policy mechanism should be established so that should an over provision of affordable housing in the borough be demonstrated, a lower requirement would be sought on new greenfield developments.	The Council's approach to this point is informed by its viability evidence. Areas within Zone 2 have a 0% requirement on brownfield sites for affordable housing; whereas areas within Zone 3 have a 10% requirement on brownfield sites for affordable housing. A policy provision in relation to overprovision of affordable housing is considered unnecessary.
		Welcomes efforts to improve affordability, however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.	The St Helens Local Plan Economic Viability Report 2018 shows that there are geographical disparities in viability, and this has informed the zonal approach proposed.
Policy LPC03: Gypsies, Travellers and Travelling Show People	-	-	-

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy LPC04: Retail and Town Centres	-	-	-
Chapter 7: Environment and Resources			
Policy LPC05: Open Space	RO0034, RO0425, RO0612, RO0875, RO1154, RO1369, RO1788, RO1956	Supports the open space designation in the Plan.	Support noted.
		The equestrian sector is an anchor of activity in the Bold Forest Park, site 4HA encompasses much of this area. The Council have failed to have regard for sites 4HA and 5HA as existing open spaces and failed to provide evidence to support the land being surplus to the requirements in line with the NPPF. The NPPF states that public rights of way should be protected by planning policies and decisions. Site 4HA is criss-crossed by public rights of way and the Mersey Forest Bold Loop circular walk.	It is the Council's intention to retain Public footpaths, albeit some may have to be re-routed accordingly.
		Paragraph 2 refers to Table 6.9. This is a typographical error as it should refer to Table 7.1.	MODIFICATION No. AM055
		(Land at Junction Lane, Newton-le-Willows) - there is no overriding reason to retain the site as an area of open space or recreation. There is no intention to use it as open space, it is not publicly accessible. The site is overgrown and in disrepair. Therefore, seek its deletion of open space from the Policies Map. There is no compelling evidence to retain the site for such a use.	The site is an identified Outdoor Sports Area. Therefore, if the owners of the site wish to develop the site they would need to adhere to this policy and other policies within the Plan.
		Table 7.1 referred to in policy quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important Policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.	Comment noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		As stated above, local standards are not appropriate for outdoor sports because they do not and cannot consider sports catchment areas or the variable units of demand for individual pitch/court types.	
Table 7.1	-	-	-
Policy LPC06: Biodiversity and Geological Conservation	RO0064, RO0180, RO0276, RO0660, RO0675, RO0875, RO1202, RO1574, RO1809	Suggest a minor modification to ensure biodiversity net gain is clearly referenced in this section to promote biodiversity enhancement. The minor modification to the text would strengthen the policy to encourage development proposals to provide biodiversity net gain rather than avoid impact or mitigate.	Comments noted, however, Policy LPC08 covers net gains in biodiversity.
		The policy makes no reference to the BFPAAP. It is essential that any development within the Bold Forest Park ensures a net gain to biodiversity. A significant number of protected species breed within sites 4HA & 5HA. Development of site 4HA will have a significant negative impact on the Bold Forest Park, resulting in a net loss, and compromise the performance of the BFPAAP.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St Helens Biodiversity Supplementary Planning Document (2011).
		Natural England state that the HRA identifies potential effects in relation to functionally linked land. More certainty is needed in relation to the availability of suitable mitigation land should it be required at project stage.	Following further consultation with Natural England, the Council consider that there is sufficient policy flexibility within the Plan to deal with the issues of functionally linked land at the planning application stage and maintain our current approach. Further references to functionally linked land and mitigation is covered in the proposed Nature Conservation Supplementary Planning Document.
		Natural England suggest until the LCR Recreation Mitigation Strategy has been developed and adopted it does not constitute mitigation for impacts on European designated sites that arise from recreational pressure in-combination with other plans or projects. We advise that until the Recreation Mitigation Strategy is developed and adopted a borough wide strategy for addressing the in-combination impacts from recreational pressure is included in the Plan. The relevant Policy	For clarity and to address the comments made by Natural England a new paragraph referring to the City Region mitigation strategy is proposed; and paragraph 7.6.5 has been amended accordingly. MODIFICATION No. AM058

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>should be worded in such a way that this interim position will be superseded when the Recreation Mitigation Strategy is finalised and adopted.</p> <p>Hermitage Brook regularly overflows its banks nearly every time it rains. The Parkside development will in effect concrete over the whole of Newton Park where natural seepage will be no longer available. In addition, as Hermitage Brook is a key area as identified by Historic England for the Registered Battlefield the flooding will seriously affect the Battlefield setting not just on the St Helens Borough Council side of the valley but the Warrington side too which has not been addressed. Therefore, it is not just this policy that is flawed, but policies LPC06, LPC10, LPC11 and LPC12 are also flawed due to the associational link of Hermitage Brook.</p>	<p>Policy LPC12 will help to ensure a sustainable drainage system is in place at sites 7EA and 8EA and flood risk is reduced.</p> <p>The site falls within Flood Zone 2, which means that it has a low chance (less than a 1 in 1,000 annual probability) of suffering from river flooding. Therefore, in accordance with national policy development of this nature is considered to be an appropriate form of development in this flood zone.</p>
Policy LPC07: Greenways	RO0375, RO0875	<p>The policy makes no reference to the BFPAAP. The development of sites 4HA & 5HA will fundamentally harm the integrity of the greenway in terms of off-road linkages, especially in relation to public rights of way and proposed bridleways.</p> <p>The existing Greenway Network runs through client's land. The Policy or the supporting text does not provide any detail regarding new routes and their locations or how they will be delivered/funded, which is a cause for concern.</p>	<p>It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.</p> <p>Figure 7.2 shows potential new Greenways. Funding for new Greenways is anticipated to come forward through S106 contributions, and grants made available.</p>
Policy LPC08: Ecological Network	RO0660, RO0675, RO0875, RO1241, RO1943	The policy makes no reference to the BFPAAP. The Council have failed to demonstrate how the aims and objectives of the BFPAAP will be met and does not explain why the recommendations of the Ecological Network Development report have been rejected.	It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'development plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		The release of site 4HA will result in the loss of the green space connecting the Local Wildlife Site (LWS108) to Bold Forest Park at Clock Face Country Park. There are no alternative green routes for species.	Policy LPC06 addresses the need to protect biodiversity including wildlife. Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development.
		<p>Local Wildlife Sites LWS90 and LWS91 are in private ownership and have not been the subject of any management plan or monitoring since their designation in 2003. Previous ecology survey findings have determined that the sites have degraded, however, Merseyside Environmental Advisory Service has advised that ecologically valuable habitats remain present on the sites. As these Local Wildlife Sites' are not subject to any management plan or monitoring they will degrade further.</p> <p>Whilst the wording of this policy suggests that the Plan seeks to strengthen the existing ecological network it does not recognise the opportunities that exist to enhance these Sites. The wording of LPC08 and the retention of Local Wildlife Sites LWS90 and LWS91 is unjustified, ineffective and inconsistent with national policy and the BFPAAP.</p>	Comment noted. However, Merseyside Environmental Advisory Service is the Council's specialist unit, which provides advice on specific environmental matters. Merseyside Environmental Advisory Service have been sent all relevant ecological reports for this site that have been provided by the owners of the land. Their conclusion is that the sites are still worthy of Local Wildlife Site designation. Therefore, the Council will rely on their advice and recommendations.
Policy LPC09: Landscape Protection and Enhancement	RO0375, RO0875, RO1058, RO1244, RO1809	Supports Policy LPC09, recognising that in allocating site 4HA the Plan must already consider that site suitable for development with regard to landscape impact.	Support noted.
		The policy makes no reference to the BFPAAP. The Landscape Character Assessment summarised the Bold Forest Park as an area able to accommodate small-scale development. Sites 4HA and 5HA cannot be described as small-scale development and the Council have failed to explain why the recommendations have been ignored and provide evidence to justify this.	It is not considered necessary to reference the BFPAAP in every Local Plan policy. The BFPAAP is part of the statutory 'Development Plan' for St Helens Borough. As such development in this area will also have to accord with the policies contained in this document.
		The Council's proposals for B8 development will have an unmeasurable impact on air quality on the local road network and cause congestion throughout St Helens, Warrington and Wigan.	LPSD policies LPA02, LPA07, LPA10 and LPD09 seek to address the issues of air quality and traffic respectively associated with planned development. The impact of

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			employment development on the local road network has been considered in the Local Plan Transport Impact Assessment 2018. The proposed Parkside link road will help address the potential for local congestion as a result of employment land development at sites 7EA and 8EA, by providing a direct link to junction 22 of the M6.
Policy LPC10: Trees and Woodland	RO0159, RO0732, RO1154, RO1809, RO1944, RO1953, RO1967, RO1968	Object to the requirement set out in paragraph 6. There is no evidence to support this policy. The HBF would like to know what the justification and evidence is for this ratio of replacement. It is considered that if the Council are seeking a 'net environmental' gain that this could be achieved in many other ways than seeking a 2:1 tree ratio.	The 2 for 1 tree replacement ratio is aligned with the requirement in the NPPF to contribute to and enhance the natural and local environment. It has therefore considered a robust and sound approach.
		This will pose practical problems for strategic sites where large-scale tree clearance is required and will lead to the retention of poor quality and damaged trees by developers who do not wish to have to replace at 2 for 1 rate.	
		Questions the necessity for Policy LPC10 to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of a planning application, the value and significance of any landscape features on a site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered.	Comment noted.
Policy LPC11: Historic Environment	RO0150, RO0854, RO1123, RO1539, RO1809	Historic England no comments to make, as all previous comments made by HE has been addressed in this policy, as well as other policies that could potentially impact upon heritage assets.	Comments welcomed.
		The reasoned justification refers to the Sankey Canal Restoration Society and working in partnership with them (along with others). The Trust supports canal restoration as a whole and the ambitions of the Sankey Canal Partnership to see the canal restored.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Welcomes the inclusion and specific reference to non-designated above ground assets.	Support noted.
		Welcomes the reference to local lists but suggests a slight amendment to the wording. There are actually 3 Registered Parks and Gardens, the third being Landscaped Associated with the Former Pilkington Headquarters Complex'.	Comments noted, and a factual correction will be made to paragraph 7.21.7, as there are three Registered Parks and Gardens in the Borough. MODIFICATION No. AM064
		The policy covers the requirement in paragraph 189 of the NPPF for a developer to provide a statement of significance relating to a heritage asset threatened by development, but appears silent on the provisions in paragraph 190, which require local authorities to identify and assess the significance of a heritage asset based on available evidence. In the Battlefields Trust's view this should be included to make clear that significance will be independently assessed by the Council rather than relying on the developers' assessment.	Paragraph 1 states: ' <i>The Council will promote the conservation and enhancement of the Borough's heritage assets and their settings in a manner that is appropriate to the significance of each asset.</i> ' It is not considered necessary or good practice to reiterate the exact wording of the NPPF.
		The policy should be clear that for designated heritage assets, great weight should be placed on their conservation as outlined by paragraph 193 of the NPPF. This should be the starting point for any consideration of less than substantial harm assessments. The draft policy seems to water this down.	The Council consider that this is adequately addressed in Policy LPC11, as any proposal would also have to adhere to national policy. Therefore, it is not necessary to repeat text from the NPPF.
		Paragraph 3 relates to substantial harm and dilutes the NPPF statement that such harm should be wholly exceptional. In the Battlefields Trust's view, the NPPF language should be reflected in this section of the policy.	Comment noted. However, the wording is considered to compliment paragraph 194 criterion b) of the NPPF.
		There is an inconsistency between paragraphs 4 and 5. Paragraph 4 relates to designated assets linking to public benefits to optimum viable use, whereas paragraph 5 relates to non-designated assets and makes no such linkage. This seems to be the wrong way around as optimum viable use criteria could be used to push through a	Comment noted. However, the policy wording is considered to be in line with national policy.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		planning application relating to a designated asset on public benefit grounds whereas it could not be similarly applied to a non-designated asset as the policy currently stands. As drafted this provision seems designed to make it easier for the Council's planning committee to agree applications which harm designated assets. This seems to the Battlefields Trust to be contrary to the spirit of paragraph 193 of the NPPF.	
		The Local People see designated heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The designated heritage assets under threat from development of Parkside are Grade II listed Buildings and monuments: St Oswald's Well, Woodhead Farmhouse, Woodhead Farm Barn, Newton Park Farmhouse and Newton Park Farm Barn.	Impacts on heritage assets will be minimised through policies LPA04.1, LPA10 and LPC11. Heritage impacts have also been considered in the HIA of the sites 7EA and 8EA in the Heritage Background Paper submitted alongside the LPSP.
Policy LPC12: Flood Risk and Water Management	RO0034, RO0624, RO0626, RO0656, RO0660, RO0675, RO1111, RO1154, RO1159, RO1244, RO1574, RO1809	Merseyside Fire & Rescue Service are encouraged that the policy seeks to ensure appropriate adaption and mitigation measures are put in place to ensure that the development is safe without increasing flood risk.	Support noted.
		United Utilities welcome the approach taken within this policy specifically paragraphs 8 to 12 which address sustainable drainage and recommend some minor amendments to paragraph 10.	Comments noted. However, it is considered the wording of Policy LPC12 is sufficiently robust and flexible.
		United Utilities would prefer to see any sites within Source Protection Zone (SPZ) 1 removed – i.e. sites 3HS & 5HS.	Both sites are safeguarded to meet longer term development need in the Borough beyond 2035.
		SPZ's have been defined across a relatively large part of St Helens, particularly in the south of the Borough. In these areas we would expect planning applications for developments to be supported by an appropriate hydrogeological risk assessment. Appropriate mitigation measures should be proposed to reduce the risk of pollution of groundwater. As such reference should be made to the Environment Agency (EA) approach to groundwater protection and associated	The Council will encourage developers to contact United Utilities at an early stage when developing their proposals to assess this matter in further detail. Paragraph 7 refers to water quality and states that development that adversely affects the quality of groundwater as defined in the Water Framework Directive will not be permitted, and that any development that could do this must be

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		position statements including the potential need for hydrogeological risk assessments.	accompanied by a Construction Management Plan. More details are also reference in the reasoned justification.
		Owing to the presence of large areas of SPZ's United Utilities consider that the Council should consider these. United Utilities have suggested preference for a standalone policy.	Comments noted, however, the Council do not consider that a standalone policy in reference to SPZ's is necessary, as the Policy as worded is sufficiently flexible and robust.
		Developments incorporating sustainable drainage systems schemes should be designed based on a site-specific risk assessment in accordance with the CIRIA (C753) Sustainable Drainage Systems Manual. All sustainable drainage system schemes should be designed to include sufficient stages of treatment appropriate to the type of catchment being drained and the sensitivity of the receiving environment. Infiltration devices should not be used on contaminated land where there may be groundwater pollution risks and they may not work in areas with a high-water table. This should be made clear in either this policy or paragraph 8 or the supporting policy justification.	Future planning applications will be assessed against the criteria set out in Policy LPC12 in addition to any relevant local and national guidance and legislation.
		Paragraph 3 does not align with national policy and guidance in respect of sites not required to undertake a sequential test.	If a site is not required to undertake a sequential approach, then surely it is located in flood zone 1. Paragraph 158 of the NPPF states that ' <i>The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding</i> '.
		Water Framework Directive is not limited to water quality but also the physical quality of our water environment. We would welcome comments highlighting development seeking to improve the hydro-morphology of water courses which will contribute to the River Basin Management Plan to achieve a 'good' ecological status being added to the Plan.	Comment noted. However, it is considered that the policy as worded is sufficiently flexible and robust, without the need for amendments.
		United Utilities recommend policies on the design of new development refer to the need for applicants to carefully consider the	Comments noted. However, this issue can be addressed at planning application stage on a case by case basis.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		finished floor levels in comparison with the proposed drainage schemes on new development sites.	
Policy LPC13: Renewable and Low Carbon Energy Development	RO0159, RO0732, RO1154, RO1612, RO1944, RO1948, RO1953, RO1960, RO1967, RO1968	Supports policy but considers that there should be more emphasis on new builds to design and build them as energy efficient as possible.	Support noted. The Council consider that this is adequately addressed in paragraph 4.
		Supports the changes made to policy which previously required a 10% increase for energy efficiency measures in excess of those required in most recent Building Regulations and a fabric first approach.	Support noted.
		Supports the need to minimise carbon emissions but is concerned with paragraph 4 that a blanket requirement for all development to ensure 10% of their energy needs can be met from renewable and/or other low carbon energy sources is unnecessary and unjustified. The 2015 Housing Standards Review and Deregulation Act determined that energy requirements for new housing development were a matter solely for building regulations with no optional standards. Section 56 of the NPPG "Housing Optional Technical Standards" is categorical that LPAs can only apply optional standards above and beyond building regulations in respect of water use, accessibility and space standards and even there must be clear evidence on viability and need.	The approach taken in this policy is considered positive and in line with Chapter 14 of the NPPF, which states that the planning system should support the transition to a low carbon future.
		With regards to paragraph 4 and the need for 10% of energy from renewable and or other low carbon energy sources is not viable. The Council's own EVA indicates that such a requirement would not be viable on the majority of sites. It should not be necessary for viability to have to be assessed on a site by site basis due to a policy requirement which is not viable across the plan.	The EVA states that all 3 brownfield sites allocated can meet the 10% renewable requirements. It further states that 50% of the greenfield housing allocations are sufficiently financially viable to support this requirement. Increasing the density on other sites improves the viability. The Council will be flexible in seeking contributions in line with LPSD policies.
		The HBF object to paragraph 4 and the need for 10% of energy from renewable and or other low carbon energy sources. Mandatory requirements are contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which	As above.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015.</p> <p>The HBF recommend that the Council ensure that this policy is justified and consistent with national policy. The potential cost of the requirements of this policy needs to be taken into consideration. There are concerns that requirements such as these could lead to the non-delivery of homes in areas where development is intended to be focused. The HBF considers that this requirement should be removed.</p>	
		There should be more emphasis on new builds to design and build them as energy efficient as possible.	Comment noted. However, the Council considers that this policy achieves that outcome.
Policy LPC14: Minerals	RO0845, RO1066, RO1574	Mineral developments have the potential to have a significant impact on water resources. We would wish to see this strengthened.	The policy wording is considered consistent with the approach taken by the NPPF.
		The Coal Authority supports the inclusion of Policy LPC14: Minerals which sets out criteria against which proposals within the MSA will be considered. We are pleased to see that coal is one of the minerals identified within this defined area. This policy also sets out criteria against which proposals for mineral extraction will be assessed and includes a framework for consideration of hydrocarbons, which is welcomed.	Support Noted.
		Objects to first sentence of this policy. This wording does not accord with the NPPF which requires that planning policies provide for the extraction of minerals resources of local and national importance.	The wording is considered to compliment paragraph 203 of the NPPF.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Whilst we are happy for reference to be made to regional supply, local provision is also important.	
		Objects to second sentence of this policy. This wording does not accord with the NPPF which requires that planning policies “so far as practicable, take account of the contribution that substitute, or secondary and recycled materials and mineral waste would make....”	The wording is considered to compliment paragraph 204 of the NPPF.
		Objects to paragraph 4. Other subsections to this policy are planned positively in accordance with the requirements of the NPPF. The policy should be amended to ensure this accords with the NPPF requirement to plan positively.	The approach in Policy LPC14 is consistent with national policies and guidance including the NPPF.
		Objects to Paragraph 7.30.6 of Policy LPC14 reasoned justification. This paragraph does not accord with the NPPF which requires that planning policies “so far as practicable, take account of the contribution that substitute, or secondary and recycled materials and mineral waste would make....”	As above. The paragraph is considered consistent with the approach taken by the NPPF.
Policy LPC15: Waste	-	-	-
Chapter 8: Development Management Policies			
Policy LPD01: Ensuring Quality Development	RO0258, RO0574, RO0626, RO0883, RO1066, RO1154, RO1244, RO1574, RO1944, RO1953	Supports policy and the recognition for the need for high quality, aspirational development in meeting the Vision and Objectives of the Plan.	Support noted.
		Supports policy, United Utilities has stated that new development is more appropriately located away from our existing operational infrastructure, especially wastewater treatment sites.	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		United Utilities welcome the inclusion of measures to reduce the impact of development to the water environment. They generally require at least an 8-metre buffer along water courses (from the top of the bank) to ensure both access and maintenance requirements as well as providing for ecological enhancement and would support this being added to either the policy wording or supporting justification.	Support noted.
		The Coal Authority is pleased to see that Policy LDP01 requires consideration of ground stability issues as part of development proposals.	Comments noted.
		Supports policy but considers that there should be more emphasis on new builds to design and build them as energy efficient as possible.	Reference to this is made in Paragraph 3, criterion c). In addition, Policy LPC13 extensively covers this issue.
		Concerned over the effectiveness of paragraph 1, criterion c), as it is not clear how developers can demonstrate an appropriate standard of amenity.	The amenity purpose of this part of the policy is clear as it ensures neighbouring uses are compatible and can co-exist without any detriment to amenity or existing operations /activities.
		<p>Concerned over the effectiveness of paragraph 1, criterion h), as it is not clear what 'appropriate circumstances are' regarding provision of public spaces. There is no evidence to back this provision up. Any policy in the LP must be justified, based on robust and sound evidence. The financial implications have not been tested in the EVA.</p> <p>Policy LPD01 requires development proposals to include or contribute to the provision of public art where the development would be of a substantial size and/or in a prominent gateway or town centre location. Para. 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning application. The lack of public art is not an unacceptable impact. The Plan should not be seeking to introduce a policy requirement that has no planning basis and is unrelated to the acceptability of a development proposal.</p>	<p>The reference to public art has been included as the Council consider that 'in appropriate circumstances' the provision of public art would increase or ensure a development's high quality, for example, it could be considered an essential element of delivering well designed public realm in association with a development.</p> <p>Policy LPA08 provides a suitable policy framework on developer contributions and planning obligations. The policy is sufficiently flexible to deal with specific cases and makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		Concerned over the effectiveness of paragraph 1, criterion i), as it is not clear what the requirements are to meet this objective.	Comments noted. However, the Council consider the policy to be flexible to respond to potentially differing opportunities on different sites and in line with national policy. Given the Borough has an aging population provision for special groups is considered justified.
		Supports the provision of high-quality development across for housing development. However, the reference to the need to 'avoid loss of high-quality soils' in paragraph 3, criterion d) is not explained or justified. In the absence of evidence, that particular part of the policy in its current form is objected to.	The reference to protection of soils is consistent with paragraph 170 of the NPPF and is an important sustainability issue. The policy is robust and sound as it allows for loss of or damage to soils where justified by wider benefits.
Policy LPD02: Design and Layout of New Housing	RO0159, RO0626, RO1154, RO1612, RO1944, RO1953, RO1967, RO1968	Supportive of the policy given that it does not seek to impose any prescriptive separation distances.	Support noted.
		The Merseyside Fire & Rescue Authority request that the Council continues to ensure fire safety is considered a priority in domestic and commercial property development applications.	Comment noted.
		United Utilities suggest that the policy should include an additional clause to ensure water efficiency measures are fully considered in the design of new development.	Comment noted. The Council consider that this issue can be addressed through Policies LPD01 and LPC12.
		Question the effectiveness of paragraph 10.	Comment noted.
		Policy should include a proviso of "no leasehold" dwellings when granting Planning Permission for new housing.	Comment noted. However, this proviso would not be considered a reasonable condition to impose at the planning application stage.
		There is significant overlap between Policies LPD02 and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.	Comments noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy LPD03: Open Space and Residential Development	RO0159, RO1154, RO1788, RO1944, RO1953, RO1967, RO1968	Broadly support policy and the inclusion of paragraph 3 that gives a degree of flexibility to allow for off-site provision or financial contributions. It is important that any financial contribution made meets the test set out in the NPPF and avoids undue costs.	Comment noted.
		Supports the amendments made in the LPSPD from the LPPO. Reference made in the policy to allow the quantity, accessibility and quality of existing open space provision to be considered when calculating the appropriate amount of open space to be provided on development sites is welcomed.	Support noted.
		Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot consider sports catchment areas or the variable units of demand for individual pitch/court types. Accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.	Comments noted. The Reasoned Justification was revised from the LPPO wording to make clear that Open Space Standards do not apply to outdoor sports provision. Paragraph 8.9.5 adds greater clarity to developers in accordance with Policies LPA08 and LPC05.
		Reference should be made to the need to consider the findings and recommendations of the most up to date open space study relevant to the area.	Paragraph 8.9.3 refers to the Council's latest open space study.
		No comments specific to the policy, however, wishes to emphasise the need for evidence to support future open space requirements in the Supplementary Planning Document.	Comment noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy LPD04: Householder Developments	-	-	-
Policy LPD05: Extension, Alteration or Replacement of Buildings in the Green Belt	RO0626	United Utilities wish to highlight that it owns a number of assets in the Green Belt, which need to be upgraded and in some cases expanded. On the basis that National policy broadly supports the expansion of operational sites in the Green Belt.	Comments noted.
Policy LPD06: Prominent Gateway Corridors	RO1375, RO1944, RO1953	There is some overlap and conflict between the requirements of Policies LPD06 and LPD02. It is considered that it would be simpler if LPD06 simply identified 'Prominent Gateway Locations' and the need for careful consideration of their design on this basis. This would leave the specific design requirements to Policy LPD02 (in the case of housing schemes) and other policies of the plan, where relevant.	Comments noted.
		Site 4EA is considered a Prominent Gateway Corridor, but at night the site is floodlit and all that can be seen from the A580 is the large plant which is for hire.	Comment noted.
Policy LPD07: Digital Communication s	RO0159, RO0732, RO1154, RO1159, RO1948, RO1967, RO1968	Generally, supports the principle of providing the latest generation of information and digital communication networks, however, this should not form a mandatory requirement for every development site given that the infrastructure and services available will vary significantly for sites across the whole borough.	This requirement is considered to be justified and is still included in the policy. The Government has brokered an agreement between Openreach and the HBF to offer access to full fibre broadband for all new developments, free of charge for developments of over 30 dwellings registered from November 2016, or as part of a co-funded initiative.
		This policy seeks to prevent development that does not have access to digital infrastructure. Building regulations set the appropriate standards and therefore it is not considered justified for the Council to seek additional local technical standards above this requirement.	Comments noted. The approach in Policy LPD07 is considered to be aligned with national policy and guidance, specifically paragraph 112 of the NPPF, which requires policies to set out how digital infrastructure is expected to be delivered.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>The HBF object to the policy as due to proposed requirements, contributions may also be sought from developers towards the cost of providing necessary off-site fast broadband infrastructure to serve the area. The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.</p> <p>Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF (2018) establishes that LPA's should seek support of the expansion of electronic communications networks, it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. The HBF consider that in seeking to provide broadband the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.</p> <p>The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks. It is not considered appropriate for St Helens to seek additional local technical standards over and above this requirement.</p>	<p>Comments noted. The approach in Policy LPD07 is considered to be aligned with national policy and guidance, specifically paragraph 112 of the NPPF, which requires policies to set out how digital infrastructure is expected to be delivered. Policy LPA08 provides a suitable policy framework on developer contributions. The policy is sufficiently flexible to deal with specific cases.</p>
		<p>Supports the policy however is concerned that the matter of digital communications cannot be delivered by housing developers and that the matter is covered by Part R of the Building Regulations and as such this matter should not be seeking to put in place any additional local standards over and above those that already exist. Concerned too that the policy requirement for off-site contributions has not been</p>	<p>As above</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		factored into the Viability Assessment where only factors such as cable ducting has been mentioned rather than contributions.	
		Objects to contributions may be sought from developers towards the cost of providing off-site broadband infrastructure.	As above
Policy LPD08: Advertisements	-	-	-
Policy LPD09: Air Quality	RO0180, RO1058, RO1809	<p>The HRA identifies potential effects in relation to air pollution. Although we feel that further work could have been done to equate the increase in cars likely to travel along the M62 motorway as a result of housing allocations.</p> <p>Natural England is seeking assurance that air pollution mitigation is available, and deliverable should it be required at project level HRA. Without these assurances the HRA cannot conclude that there will be no in-combination impacts to designated sites as the Plan is relying on project level HRAs. As there is a reliance on project level HRA, they would expect to see reference to the type of mitigation measure available and their deliverability set out in this policy.</p>	<p>Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.</p> <p>Paragraph 8.27.7 has been updated to address the comments of Natural England in the interests of clarity.</p> <p>MODIFICATION No. AM067</p> <p>A further new paragraph has also been produced in the interests of clarity and to address the comments of Natural England.</p> <p>MODIFICATION No. AM068</p>
Policy LPD10: Food and Drink	RO1676, RO1809	The policy is too negative towards hot food takeaways. There is no strong or consistent evidence, with no regard to national policy.	The approach taken in this policy is considered positive and in line with Chapter 8 of the NPPF, which states that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, including access to healthier food. The policy and criteria concerning the location of hot food uses are considered to be justified on the basis of evidence, and in order to promote healthy eating habits and reduce the rate of childhood obesity.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
			The policy does not contain a blanket ban or exclusion zone for A5 uses.
Appendices			
Appendix 2: Definition of Infrastructure	RO1244	Appendix 2 (referred to within the supporting text of the policy) is of concern. It is a non-exhaustive list of what the Plan considers infrastructure to be. The Policy states that satisfactory provision of all forms of infrastructure that are required to serve the needs of the local community will be sought. There is no evidence supporting the contents of Appendix 2, nor is there any formula provided as to how the contribution for each will be calculated. Appendix 2 appears to be a wish-list rather than a representation of what is actually required. Greater clarity should be included in the Plan along with evidence on what is actually required and the contributions this is likely to entail.	Appendix 2 is merely a list of categories that infrastructure covers. Appendix 5 sets out requirements for each site (in addition to any others that are needed to comply with Plan policies). These requirements will inform the infrastructure requirements and contributions on a site by site basis through the planning application process.
Appendix 3: Aims and Objective and Policies	-	-	-
Appendix 4: Monitoring Framework	RO0159, RO1955, RO1967, RO1968	The monitoring and review scenario are confusing. If the monitoring framework is to be credible then Policy LPA06 needs to be amended and clearly set out under what circumstances the Council would grant planning permission on safeguarding land. Without clarity the policy is unsound and not justified.	The trigger for action, i.e. the consideration of early review of the Local Plan (as set out in the Monitoring Framework) is 10% or more of safeguarded land being granted planning permission. The Monitoring Framework and Policy LPA06 are considered to be clear.
Appendix 5: Site Profiles – Allocated Employment and Housing Sites	RO0136, RO0375, RO0665, RO0676, RO0919, RO1244, RO1809, RO1940, RO1944, RO1949, RO1962	Site Profile 1EA Warrington Council suggest that a further two bullet points be added to the Site Profile: <ul style="list-style-type: none"> <i>A future planning application for this extension to Omega must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.</i> <i>If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would</i> 	Comments noted. The site profile has been updated for clarity and to address the comment of Highways England that site specific infrastructure requirements should be identified. MODIFICATION no. AM074

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<i>potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.</i>	
		<p>Site Profile 6EA The bullet point referring to the integration of the site with surrounding sites is unclear. We presume the policy requires new developments to relate well to each other. The site references to both sites are incorrect too and should be 2EA and 5EA (not 4EA and 6EA).</p>	<p>Correct as this area has been divided into 3 separate sites, the Council would want them to integrate and relate well to each other.</p> <p>MODIFICATION No. AM0074 3rd bullet point should refer to sites 2EA and 5EA and not 4EA and 6EA.</p>
		<p>Site Profile 7EA Inset Maps and Maps in Appendix 5 should be amended to reflect route in the current planning application (Phase 1) - P/2018/0048/OUP.</p>	<p>This is not considered necessary as the Planning Application is yet to be determined and has since been called-in by the Secretary of State, who will hold a local inquiry.</p>
		<p>Site Profile 8EA The sites profile states that “the future development of siding facilities”. This should have been expressed as “the future development of siding facility” (in the singular). But to have the phrase as part of LPSD 8EA as future development of siding facilities goes further than just the rail siding as it expresses additional facility to the rail siding.</p> <p>Warrington Council suggest a further bullet point is added to the Site Profile:</p> <ul style="list-style-type: none"> The amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England. 	<p>Comment noted. However, the existing text is considered appropriate.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<p>Site Profile 10EA Supports the Plan in respect of this allocation, however, should refer to the subsequent planning applications which are being brought forward.</p>	<p>Comment noted. However, the existing text is considered appropriate.</p>
		<p>Site Profile 2HA Agree access for the site, via Vicarage Road and the A580.</p> <p>Financial contributions will be assessed during the planning application process and will be subject to the relevant s106 policies and will be reasonable and justified. It is therefore not necessary to identify within the policy which contributions are 'likely' to be required.</p>	<p>Comments noted. However, the Council do not consider it unreasonable to reference potential contributions and requirements for the site.</p>
		<p>Site Profile 4HA The use of the word 'must' does not provide flexibility, and do not consider whether the delivery of such Green Infrastructure would render the development unviable.</p> <p>All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity. To make the Plan effective, it is necessary for the Development Requirements in Local Plan Appendix 5 to be modified regarding the equalization of timing, housing density, type of housing and developer contributions on the site.</p> <p>Warrington Council suggest additional bullet points be added to the site profile:</p> <ul style="list-style-type: none"> <i>The Area Action Plan for Bold Forest Garden Suburb must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8 and additional traffic through Burtonwood.</i> 	<p>The BFPAAP is a statutory document, therefore the policies within this document must also be adhered to.</p> <p>It is the Council's intention to enter into an equality agreement. Given the size of the site and work needed to mitigate development the Council do not consider it necessary to amend the wording in Appendix 5, given the site has yet to be formally masterplanned.</p> <p>The site profile has been amended to reflect the masterplanning for the site, to ensure it is informed by the findings of the Bold Forest Garden Suburb Transport Review.</p> <p>MODIFICATION No. AM074</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
		<ul style="list-style-type: none"> <i>It is likely that required transport improvements will include major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England</i> <i>Measures to enhance accessibility between the Garden Suburb and Omega by walking, cycling and public transport should form part of any overall transport plan for the development.</i> 	
		<p>Site Profile 6HA Strongly support the allocation of this site. However, the requirements set out are unsound, and should be amended. The indicative requirements should clearly facilitate a flexible, innovative approach to be taken to masterplanning and the subsequent development of the site. In particular, the requirements relating to green infrastructure and employment land should be revised.</p> <p>Acknowledge the need to appropriately safeguard and enhance areas of biodiversity and wildlife value. However, significant reclamation works are required to stabilise the site and will impact on areas previously identified as having wildlife value. Green infrastructure will need to be integrated with approaches to screening of the site from continuing industrial uses along its western edge.</p> <p>Welcome the requirements to provide the scope to use the employment area for housing if employment does not come forward. However, it is considered that reference should also be made to other appropriate commercial uses in this area consistent with new residential development.</p>	<p>Comments noted.</p> <p>The site profile for 6HA has been updated for clarity and to address the comment of Highways England that site specific infrastructure requirements should be identified.</p> <p>A further bullet point has also been added for consistency with requirements stated for other sites.</p>
Appendix 6: Site Profiles – Allocated Gypsy and Traveller Sites	-	-	-

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Appendix 7: Site Profiles – Safeguarded Employment and Housing Sites	RO0082, RO0136, RO1953	Site Proforma 1ES Warrington Council suggest the following bullet point be added: <i>Any development of this site will require major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England.</i>	The site proforma has been amended for clarity and to address the comment of Highways England that site specific infrastructure requirements should be identified.
		Site Proforma 8HS The wording in the associated site proforma in Appendix 7 is welcomed, however residents remain sceptical that highway improvements and education provision will come forward. They would like to see additional referencing to other on-site amenities such as convenience stores or even health provision.	Comments noted. However, this is not considered necessary at this stage.
Appendix 8: Sites of Biodiversity and Geodiversity Importance	-	-	-
Appendix 9: Nature Improvement Areas	-	-	-
Appendix 10: Mineral Resources and License Areas	-	-	-
Appendix 11: Town, District and Local Centre Boundaries	-	-	-

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

POLICY	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Appendix 12: Existing Employment Areas	-	-	-

INFRASTRUCTURE DELIVERY PLAN (IDP)			
General Comments / Issues			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
General Comments/ Issues	RO0039, RO0099, RO0117, RO0119, RO0125, RO0138, RO0154, RO0284, RO0306, RO0346, RO0347, RO0397, RO0410, RO0411, RO0412, RO0424, RO0425, RO0446, RO0454, RO0542, RO0559, RO0560, RO0582, RO0583, RO0629, RO0688, RO0693, RO0702, RO0735, RO0771, RO0833, RO0860, RO0868, RO0875, RO0887, RO0919, RO1033, RO1034, RO1116, RO1177, RO1184, RO1188, RO1205, RO1244, RO1269, RO1270, RO1288, RO1289, RO1309, RO1310, RO1343, RO1345, RO1350, RO1410, RO1420, RO1421, RO1515, RO1531, RO1532, RO1533, RO1534, RO1555, RO1556, RO1633, RO1780, RO1782, RO1872	The IDP does not show how road improvements will be funded, how medical services will provide for over a thousand additional families or how long-term impacts on education will be addressed in the Eccleston area. There is no mention of funding or managing the additional resources within the IDP.	The specifics of some infrastructure, understandably, cannot be identified at this stage. Both sites designated in Eccleston (3HS and 8HS) are both safeguarded sites and not expected to come forward until the next Plan (2035 – 2050). Therefore, details and infrastructure provision for those sites are not known at this stage, so will be included in a later version of the IDP.
		The IDP highlights projects currently underway in the Borough to try to alleviate the problems of today but lacks any substance on what will be done to solve the issues of the future.	The specifics of some infrastructure, understandably, cannot be identified at this stage. However, the IDP is considered a living document and will be updated accordingly.
		The IDP does not address the issues of air quality, noise, tranquillity, education and health.	Policies within the Plan will address air quality and noise. The need for areas of tranquillity, or how they would be defined is not clearly set out in national policy. The Plan or the IDP does not therefore identify such areas.
		The IDP is weak as in areas suggested for housing development there are already school shortages and transport problems.	The Council will continue to work with its education and transport colleagues to help address and facilitate the impact of new development on existing facilities.
		The IDP contains factual inaccuracies, inconsistencies and statements. It only details existing projects but does not consider the grossly inflated growth aspired to within the Local Plan.	A 2019 IDP has been produced and forms part of the suite of submission documents.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Chapter 1: Introduction			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Introduction	-	-	-
Chapter 2: Policy Context			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Policy Context	-	-	-
Chapter 3: Physical Infrastructure			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Physical Infrastructure	RO0461, RO1364, RO1365, RO1917	IDP refers to current road improvements but no mention of local impact or improvements to roads.	Traffic impact has been assessed in the St Helens Local Plan Transport Impact Assessment 2018. A 2019 IDP has been produced which accompanies the other submission documents and identifies pressure points within the Borough and potential improvements to these.
Chapter 4: Social and Community Infrastructure			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Social and Community Infrastructure	RO0461, RO0767, RO1266, RO1364, RO1365, RO1853, RO1917	Fails to meet the NPPF (paragraph 8 b) for the social objective in achieving Sustainable development.	Comment noted.
		Fails to address the impact of the LPSD will have on existing health and education facilities with no details on how this will be addressed.	The Council will continue to work with its education colleagues and Clinical Commissioning Group to help address and facilitate the impact of new development on existing facilities.
		Understands and agrees with the concerns about the increasing demand for access to GP services in Rainford and is not convinced by the information in the IDP in relation to the expectation that there will be sufficient capacity in existing surgeries to cater for increased demand subject to the ability to recruit. Whilst both surgeries in Rainford are excellent they are, however, both currently and	Comment noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		significantly overstretched. This will need addressing as 259 houses will generate more patients.	
		There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or educational authorities.	The Duty to Cooperate Statement affirms that the Council will continue to work with the Clinical Commissioning Group, hospital and health trusts regarding health needs, future housing and other development, alongside the estate management programmes of these trusts.
Chapter 5: Environment Infrastructure			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Environment Infrastructure	-	-	-
Chapter 6: Infrastructure Funding			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Infrastructure Funding	-	-	-
Chapter 7: Infrastructure Delivery Schedule			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Infrastructure Delivery Schedule	-	-	-
Chapter 8: Appendices			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Appendices	-	-	-

HABITAT REGULATIONS ASSESSMENT (HRA)

General Comments / Issues

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
General Comments / Issues	RO1477	No formal notice form St Helens Borough Council confirming designation of Local Wildlife Site - LWS90 as a wildlife site.	Comment noted.
		The HRA is not wholly accurate. The distance from the Mersey Estuary SPA and Ramsar site appears inaccurate and it states that the site is within an IRZ of a SSI for pink footed geese; however, the SSI is not named. Acknowledge that the site may provide habitat for wintering birds but unlikely it will result in significant adverse effects as a result of habitat loss.	Comment noted. An addendum to the HRA has been produced and forms part of the suite of submission documents.

SUSTAINABILITY APPRAISAL (SA)			
General Comments / Issues			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
General Comments / Issues	RO0052, RO0061, RO0116, RO0117, RO0131, RO0159, RO0243, RO0253, RO0264, RO0336, RO0395, RO0416, RO0485, RO0561, RO0611, RO0736, RO0783, RO0784, RO0795, RO0862, RO0863, RO0890, RO0937, RO1009, RO1037, RO1058, RO1116, RO1171, RO1172, RO1173, RO1174, RO1189, RO1190, RO1193, RO1194, RO1205, RO1288, RO1325, RO1436, RO1459, RO1472, RO1574, RO1633, RO1670, RO1770, RO1783, RO1800, RO1824, RO1849, RO1918, RO1919, RO1920, RO1921, RO1922, RO1923, RO1948, RO1949, RO1954, RO1959, RO1967, RO1968	Whilst in general housing development can be considered to be at the lower end of the risk scale with regard to the protection of groundwater quality and resources, in certain areas, and close to certain receptors the risk of development can increase significantly.	Comments noted.
		Whilst the SA does provide an assessment of the reasons for the allocation, safeguarding or discarding of sites (Table 6.3 - housing and employment), there is no clear assessment of the relative or comparative merits of the potential housing sites to determine why some housing sites are considered worthy of allocation and others safeguarded.	Table 6.2 in the SA Report summarises the site appraisal process, which provides a comparison of the relative merits and constraints of each site. The rationale for selecting sites is set out in table 6.3. The decisions relating to the allocation, safeguarding or discounting of sites are not related to the SA only but also a range of other factors.
		Only 4 of the housing site options considered in Table 6.2 of the SA scored 'red' (negative impact) against 4 or more of the sustainability criteria. Of those, 8HA is the only one still being brought forward for future development. It follows that 8HA is the least sustainable housing site being allocated.	It is not the role of the SA to suggest what sites should be allocated and which should not. The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision-making process but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.
		The Council's assessment of the sustainability of Peel's sites at Haydock Green (former LPPO Site HA10), Haydock Point North (LPSP Site 2ES) and Haydock Point South (Site GBP_036) through the SA process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.	All sites have been assessed consistently and objectively through the SA. This contributes to the decision making process but is not the only factor.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

	<p><u>LPSD Site 2ES (Haydock Point North)</u></p> <ul style="list-style-type: none"> SA1. Biodiversity: Detailed ecological surveys reveal that the site is not of high biodiversity value. Air quality: Modelling demonstrates that there will be no significant effects with regards to traffic. Local Economy: The SA downplays the economic benefits of the site. <p><u>Site GBP 036 (Haydock Point South)</u></p> <p>An alternative appraisal is presented.</p> <p>SA1. Biodiversity: Suggest amber rather than red.</p> <p>SA2. Land quality: Suggest amber rather than red.</p> <p>SA3. Air quality: Suggest amber rather than red.</p> <p>SA4. Sustainable water resources: Suggest green rather than grey.</p> <p>SA5. Climate change: Agree</p> <p>SA6. Flooding: Suggest grey rather than amber.</p> <p>SA7a. Landscape: Agree</p> <p>SA7b. Prominent ridgeline: Agree</p> <p>SA8. Cultural Heritage: Suggest grey rather than amber.</p> <p>SA15. Economy: Agree</p> <p>SA17. Poverty: Agree</p>	<p><u>LPSD Site 2ES (Haydock Point North)</u></p> <p>The site assessment is based upon agreed criteria and did not have the benefit of detailed surveys and modelling. For consistency, the sites are all scored on the basis of the same information.</p> <p><u>Site GBP 036 (Haydock Point South)</u></p> <p>The scores in the SA are derived from the site appraisal framework in Appendix II of the SA Report. All scores are correct in this context.</p> <p>SA1. The SA does not benefit from detailed ecological surveys for each site. To ensure consistency, the criterion is based purely on the presence of known wildlife constraints. In this respect, a red score is correct.</p> <p>SA2: The criterion is based upon the amount and quality of agricultural land present. A red score is correct on this basis.</p> <p>SA3. The appraisal criterion is a high-level measure to identify potential constraints. In this case HGV generating development within an AQMA equates to a red score. The appraisal did not have the benefit of detailed monitoring and needs to ensure that sites are compared using the same information.</p> <p>SA4. Only two scores are possible under this criterion (grey and amber).</p> <p>SA6. 2% of the site is within flood zone 2/3, which means an amber score is recorded in line with the site appraisal framework. It is acknowledged that this is a limited constraint in the context of the site though.</p>
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ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>SA19. Travel: Agree</p> <p><u>Former LPPO site HA10 (Haydock Green)</u></p> <p>Peel disagrees with four outcomes in the site appraisal for Haydock Green.</p> <p>SA1 should be amber and not red (mitigation is possible and will avoid significant effects).</p> <p>SA9 should be green and not amber.</p> <p>SA15 should be green and not amber.</p> <p>SA16 should be green and not amber.</p>	<p>SA8: There is a listed building on site (Dean School Cottage). However, it is acknowledged that significant effects could be avoided hence an amber rather than red score.</p> <p><u>Former LPPO site HA10 (Haydock Green)</u></p> <p>SA1. The site appraisal was undertaken without the benefit of detailed surveys, and to ensure consistency presents a 'mitigation-off' appraisal. A red score is correct in this context.</p> <p>SA9. The appraisal criteria stipulate that potential negative effects are recorded in the presence of historic assets / features. This is an appropriate approach that accords with the precautionary principle. It should be remembered that this is a 'mitigation-off' appraisal.</p> <p>SA15. Disagree.</p> <p>SA16. The site was identified in the GBR (2018) as having deliverability issues, hence the amber score (in accordance with the SA site appraisal framework).</p>
		<p>Site 8EA is adjacent to a SPZ, therefore, for growth alternatives 2 and 3 a potential negative effect is predicted, as there could be disturbance nearby. However, it is unlikely that significant effects would be generated given that only a very small area of the site overlaps the groundwater SPZ, and it is not in zone 1.</p>	<p>Comments noted. It is considered unnecessary to amend the report findings though, as the risk to groundwater is considered to be low (and would be dealt with through the planning application process at individual sites).</p>
		<p>The SA should show awareness that some residential development can cause risks to groundwater.</p>	<p>Comments noted. It is considered unnecessary to amend the report findings though, as the risk to groundwater is considered to be low (and would be dealt with through the planning application process at individual sites). There are no specific issues identified for any of the allocated sites.</p>
		<p>With relation to groundwater protection, it is suggested that mitigation measures during construction should be routine to ensure that effects are avoided.</p>	<p>It is expected that the planning application process would deal with such matters. Additional policy changes in the Plan would be helpful but would not lead to a difference in the SA findings.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		Paragraph 4.2.13 fails to acknowledge site 9EA benefits an extant planning permission for B1/B2/B8 uses.	Para 4.2.13 does state that site 9EA has an extant planning permission.
		<p>Regarding site 8HS:</p> <p>1. SA1. It is considered that an amber score should be given rather than red.</p> <p>2. SA8. Site is scored red due to overlapping with an area of archaeological interest. Disagree.</p> <p>3. SA9. The SA scores a potential negative effect with regards to open space. However, an indicative masterplan shows that major open space will be provided.</p> <p>4. SA13. The site could provide new facilities on site, which would warrant a positive effect.</p> <p>5. SA14. The site has excellent access to the A580 and therefore will promote access to employment opportunities. It should therefore be scored green.</p>	<p>1. SA1. The appraisal criteria applied is based upon fixed criteria to allow for a consistent comparison of sites. The score is merely to identify the potential constraints and merits of sites, rather than to determine precise impacts. A red score is recorded as the site contains a Local Wildlife Site. It is acknowledged that with mitigation, these effects can be avoided.</p> <p>2. SA8. <u>The score has been recorded red in error and should be amber</u> (consistent with all other sites scored this way).</p> <p>3. SA9. To ensure consistency, new open space provision was not factored into the assessment as a criterion. Therefore, the scores remain the same for the purposes of the SA. However, it is recognised that strategic development can deliver improvements, and this is a factor that is taken into account in the decision-making process.</p> <p>4. SA13. <u>As the site is likely to deliver more than 500 dwellings, the score should be a positive (green).</u></p> <p>5. SA14. The site is not within 1.2km of a major employment area. Therefore, a neutral score remains.</p>
		<p>Comments are raised about specific scores in the SA and how these relate to criteria in the GBR (2018).</p> <p>1. For sites 3HS and 4HS, there is a view that criteria SA3 should be negative rather than neutral.</p> <p>2. For 3HS criteria SA9 should be negative rather than positive as development would result in the loss of recreational space.</p>	<p>1. The scores within the SA are based upon set criteria and relate to potential effects in terms of air quality. Both the GBR (2018) and the SA are pieces of evidence that have informed the decision-making process.</p> <p>2. SA9 deals with access to open space. In this respect the site is scored correctly.</p> <p>3. The SA score is considered appropriate. Though there is objection and uncertainty, this does not mean that mitigation</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>3. Suggestion that site 4HS should score a red for SA8 (rather than amber). This is based on the fact that Historic England have raised objections.</p> <p>4. There is potentially functionally linked habitat at site 1HS. The SA score for SA2 should therefore be amber and not neutral.</p>	<p>isn't possible. A red classification would equate to heritage assets being likely to be lost or the setting of an asset in an open area being significantly affected. The site does not fit this category.</p> <p>4. The SA utilised a proximity-based method to ensure consistency in comparison of sites. In this respect, the neutral score is correct. The HRA and GBR (2018) are separate pieces of evidence, which are also important in the decision-making process. The Council has had access to all three (plus other) evidence studies to inform its decisions.</p>
		<p>ID104 E13 in the assessment table (page 37 in the SA Report) is inconsistent with the Technical Appendix A. Furthermore, there is no tangible evidence/risk to biodiversity, landscape sensitivity, or distance to prominent ridgeline. Also, the development of this site for employment uses will clearly support the local economy, reduce poverty and social exclusion and minimise the need to travel (in contrast with the table which suggests a 'neutral' impact only).</p>	<p>We find the summary in table 6.1 to be consistent with the correlating proforma in Technical Appendix A.</p> <p>The scores associated with biodiversity and landscape have been identified correctly according to the site assessment criteria. The site appraisals are a high-level assessment tool to identify the relative merits and constraints. This does not represent a detailed assessment of impacts.</p> <p>The criteria for addressing inequalities is related to the proximity of the most deprived areas to the potential employment site. In this respect, the site scores a 'neutral' effect. This does not mean that measures could not be taken to try and strengthen links between such areas though. At this high-level assessment stage though, the criteria and outcome score are considered to be appropriate.</p>
		<p>There are numerous discarded sites with only one or two negative indicators whilst sites with greater negativity have been allocated or safeguarded. Parcels of land have 5 or more negative indicators; 2 being discarded but somehow site 8HS was deemed worthy of safeguarding. This leads to question the purpose and validity of the SA given that so many negative indicators do not appear to deter allocating or safeguarding land, adding more weight to the theory that</p>	<p>It is not the role of the SA to suggest what sites should be allocated and which should not. The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision-making process but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		parcels have been pre-selected and an attempt to reverse-engineer the findings has been carried out to arrive at the desired results.	
		<p>Objects to the findings regarding site 8HS (AECOM ID:75), as follows:</p> <ol style="list-style-type: none"> 1. SA3 is marked as unlikely to have significant affects to air quality; however it is clear that the development of site 8HS will generate new traffic and will require a new roundabout from the A580 to serve the development which will lead to stationary traffic with idling engines, so how can this possibly be marked neutral. 2. SA6 is marked as potentially negative effects which could be mitigated. This cannot be marked as amber given the unknown conditions and the long-localised history of flooding in the area that not only impacts the development site but also Bleak Hill School and Hamilton Road. 3. SA12 indicates that the development is likely to have a positive effect on health given that there is a Medical Centre (Eccleston) some 529m away. However, the medical centre is located much further away at 1km from the site and is planning on relocating to 1.5km away. This will undoubtedly lead to many short car journeys, increasing congestion and air pollution and thus having a negative impact on health. 4. SA13 indicates that there would be neutral impact, however the local secondary school (some 550m away) is already at capacity and a further school in the area would only add to existing traffic congestion and associated pollution. The impact of development of this site should therefore be negative. 5. SA14 identifies employment opportunities in farming at Catchdale Moss. This is unrealistic given that the development of 60ha of agricultural land for 1,200 new homes will remove farming jobs. The nearest employment prospects are over 6km away with no 	<ol style="list-style-type: none"> 1. With regards to 8HS, the findings are based upon agreed criteria from scoping. These are applied consistently and are indicative high-level findings. No changes are considered necessary. 2. The appraisal outcome is based upon the agreed thresholds in the appraisal framework. For those sites where only part is at risk of flooding, it is considered that potential negative effects are avoidable / can be mitigated. Again, this depends upon scheme details, but at this high level, a site that is not entirely at risk of flooding is justified as an amber score rather than red. 3. Measurement was based upon distance at the time of assessment for consistency. Was not aware of relocation plans. 4. SA13 does not take account of capacity factors. This is a recognised weakness in the criterion. In terms of distance though, the findings are correct and therefore the score remains the same. 5. Catchdale Moss is categorised as a 'key employment area'. The criteria measures distance to the nearest opportunities and is scored accordingly. This does not mean that all new homes here would be served by such opportunities. There are other key employment areas within 5km of the site also, so a neutral score is appropriate.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>connecting public transport service which will promote car dependency and increase traffic particularly at Windle Island.</p> <p>6. SA19 indicates that the development will have a positive effect given its location 85m of a local bus stop. Objector states that the bus stop is a low frequency service and much of the development site (8HS) will lie 1 km from the bus stop.</p> <p>7. SA20 regarding access to town, district and /or Local centres indicates that the site benefits from a local convenience store within 45m. Objector states that the shop in question is on the northern side of the A580 and is not easily nor safely accessible. The development cannot score more than amber given the circumstances.</p>	<p>6. The score is based upon agreed criteria and is correct. Agree that larger sites will have varying degrees of accessibility though.</p> <p>7. Agree that the score does not reflect real physical / safety barrier. A negative score should be recorded rather than a positive for SA20.</p>
		<p>In specific relation to site 10HA, do not agree with some of the findings of the SA.</p> <ul style="list-style-type: none"> • SA1 - development here is currently categorised as having likelihood to generate negative effects due to it containing 288m of Local Wildlife Site (Sutton Brook) and is 89m to the nearest TPO. However, the majority of the development at the site will be placed at an appropriate distance from the Brook as to avoid harmful impacts, and any development that will be nearby to the Brook will be appropriately mitigated for. There will be ecological enhancement and management works at the site, including the Brook, which will offset any impacts development may have on the Local Wildlife Site. As the site is 89m from the nearest TPO it is highly unlikely that development here will have any impact on the tree(s) as the development will be contained solely within the site boundary. However, appropriate mitigation will be put in place if there is a risk of impact and it is therefore recommended that the site should be considered 'Amber' in the SA as any potentially negative effects can be mitigated against. • SA2 - given that the land at Moss Nook currently comprises a derelict site and so the redevelopment for residential dwellings will 	<p>SA1 - The site appraisal framework is a high-level assessment tool that identifies the relative constraints and merits of sites. This does not take account of the exact location of development or detailed proposals for mitigation (hence the red score).</p> <p>SA2 - is determined on the basis of the amount and quality of agricultural land on site. There are only negative or neutral effects for this criterion as development will not lead to improvements with regards to agricultural land. A greys score is correct.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>promote positive effects to the land quality and as such should score 'Green' 2 in the SA (as opposed to 'Grey'3).</p> <p>To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.</p>	
		<p>The methodology used to assess development sites within the SA is questionable particularly in relation to the Burrows Lane Site. The Burrows Lane Site was given an overall "high+" score for its Green Belt contribution even when it is acknowledged that it makes a low contribution on one of the three purposes. The evidence presented by the Council is not robust and requires a comprehensive update as part of the next stage of the local plan.</p>	<p>The scores relating to the Green Belt have been derived from the GBR (2018).</p>
		<p><u>Site 6HA</u></p> <p>SA16 - should be red and not grey as deliverability could be an issue.</p>	<p><u>Site 6HA</u></p> <p>Deliverability scores have been derived from the details in the SHLAA, which suggests development could occur within the plan period. Score is correct.</p>
		<p><u>Site 8HA</u></p> <p>SA2 - Disagree with amber score. Grade 1 should be red no matter what size of site.</p>	<p><u>Site 8HA</u></p> <p>The criteria and thresholds were presented for comment at scoping, but no such issues were raised. The approach taken is considered to be appropriate.</p>
		<p><u>Site 10HA</u></p> <p>SA16 should be grey not green.</p>	<p><u>Site 10HA</u></p> <p>Deliverability scores have been derived from the details in the SHLAA (2017), which state development in years 6-15. <u>Amend from green to grey.</u></p>
		<p><u>Site 1HS</u></p>	<p><u>Site 1HS</u></p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		SA20 should be grey not green.	The SA covers a different red line boundary, which brings a potential access point closer to a convenience store. However, the large nature of the site means that much of the site would not be accessible within 400m, so the <u>score should be amended from green to grey.</u>
		<u>Site 2HS</u> SA16 should be grey not green.	<u>Site 2HS</u> Deliverability scores have been derived from the GBR (2018) (see table 5.4 of the GBR (2018) for a summary).
		<u>Site 3HS</u> SA13 should be grey not green for primary school. SA16 should be grey not green as not available in first 5 years.	<u>Site 3HS</u> Deliverability scores have been derived from the GBR (2018) (see table 5.4 of the GBR (2018) for a summary).
		<u>Site 6HS</u> SA1 should be amber not red as the wildlife site is adjacent not on site. SA13 should be grey not green for primary school.	<u>Site 6HS</u> SA1 - The wildlife site is within the assessed site. The boundary has been amended at the allocation stage to reflect this constraint. Therefore, the red score within the SA Report was correct. SA13 – Precise access point was unknown at time of appraisal. Measurement was taken from centre of site and access presumed possible by foot to Wordsworth avenue and Shakespeare Road (which is less than 400m and hence green).
		<u>Site 8HS</u> SA16 should be grey not green.	<u>Site 8HS</u> Deliverability scores have been derived from the GBR (2018) (see table 5.4 of the GBR (2018) for a summary).
		<u>Land north of the M62 and south of Mill Lane</u> SA1 - Red line area does not include the TPOs.	<u>Former LPPO Site HS23 (Land north of the M62 and south of Mill Lane)</u>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

	<p>SA2 - Detailed survey shows mostly 3b.</p> <p>SA7 - Should be amber not red as mitigation can be employed.</p> <p>SA8 - Should be amber not red. Listed assets are not in red line boundary and also mitigation can be employed.</p> <p>SA9 - PROW should be positive not amber.</p> <p>SA12 - Disagree with the distance to leisure facilities, should be amber not red. Golf club nearby.</p> <p>SA16 - Should be green not grey.</p> <p>SA20 - Should be green not grey - the petrol station shop does have a small range of products.</p>	<p>SA1 – Assessment was based on the submitted red line boundary.</p> <p>SA2 – Detailed studies were not taken into account (or available) at the time of assessment. To ensure consistency, this would have to be done for all other sites.</p> <p>SA7 – Mitigation strategies have not been taken into account at the time of assessment.</p> <p>SA8 – Assessment was based on the submitted red line boundary. Mitigation strategies have not been taken into account at the time of assessment.</p> <p>SA9 – Amber score has been recorded as potential for severance exists. This is consistently applied for other sites too. Mitigation not considered.</p> <p>SA12 – Private golf clubs are not included in the assessment of leisure facilities.</p> <p>SA16 - Deliverability scores have been derived from the GBR (2018) (see table 5.4 of the GBR (2018) for a summary).</p> <p>SA20 – For the purposes of the assessment, the petrol station is not classified as a convenience store. It has been mentioned for context.</p>
	<p><u>Burrows Lane - Eccleston</u></p> <p>SA1 - should be grey not red as the site boundary has changed.</p> <p>SA7 - Landscape assessment of their own says amber not red.</p> <p>SA9 - should be green as it will not affect PROW (instead of grey) - this isn't what the criteria says though.</p> <p>SA16 - Should be green not red.</p>	<p><u>Former LPPO Site HS08 (Burrows Lane – Eccleston)</u></p> <p>SA1 – Assessment was based on the submitted red line boundary.</p> <p>SA7 – Detailed studies were not taken into account (or available) at the time of assessment. To ensure consistency, this would have to be done for all other sites.</p> <p>SA9 – Scoring in the SA Report is correct.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

			SA16 - Deliverability scores have been derived from the details in the SHLAA.
		Increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
		A number of assessed sites have different red line areas to those for the proposed allocations, therefore some of the scoring is not completely accurate.	<p>The appraisal findings are based upon the red-line boundaries available at the time of assessment.</p> <p>The site appraisal is not meant to result in a score and ranking for each site. It is to identify high level constraints and opportunities for each site. It should be acknowledged that mitigation can have a bearing on the overall effects of a development.</p>
		The SA shows 4 sites within the Local Plan to have negatives, 3 of which have now been disregarded, so by the Council's own assessment site 8HA is the least appropriate site allocated for housing.	<p>It is not the role of the SA to suggest what sites should be allocated and which should not.</p> <p>The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision-making process but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.</p>
		The SA is flawed; it does not produce an objectively assessed study and conclusion. The scoring allows for variable interpretation and inconsistent answers to the same questions in order to justify site selection.	<p>It is not the role of the SA to suggest what sites should be allocated and which should not.</p> <p>The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision-making process but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>Objects to removal of site 3HS from Green Belt for safeguarding. The SA and Non-Technical Summary report hasn't used the most recent Indices of Deprivation data (2015) to emphasise the importance of focusing on improving facilities and services for existing residents rather than generate further pressure on these same services by building new homes.</p>	<p>It is not the role of the SA to set the strategy for the Borough. The SA does however set objectives that seek to reduce poverty and social exclusion, to improve health and inequalities, and to improve access to services. In this respect, the Plan (and reasonable alternatives) has been tested as to the extent to which it would achieve these objectives.</p> <p>The reference to St Helens being the 36th most deprived local authority is accurate and is taken from the most up to date 2015 Index. St Helens was ranked 51st in the 2010 Index. The SA Framework identified deprivation as a key issue to be addressed.</p>
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GREEN BELT REVIEW 2018 (GBR (2018))			
General			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
General Comments on the GBR (2018)	RO0052, RO0098, RO0117, RO0149, RO0159, RO0169, RO0283, RO0363, RO0364, RO0440, RO0441, RO0489, RO0491, RO0502, RO0562, RO0597, RO0600, RO0767, RO0771, RO0789, RO0875, RO0895, RO0979, RO1058, RO1116, RO1121, RO1154, RO1156, RO1205, RO1269, RO1270, RO1288, RO1430, RO1550, RO1568, RO1589, RO1590, RO1666, RO1677, RO1721, RO1804, RO1811, RO1896, RO1946, RO1955, RO1958, RO1959, RO1960, RO1961, RO1964, RO1967, RO1968	The points raised throughout the GBR (2018) document clearly show inconsistencies with subjective scoring and findings. It's almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings, and rationale (with a number of inaccuracies in the overall scores) documented to produce the desired results.	Comments noted. The GBR (2018) sets out a robust approach to determine which sites should be released from the Green Belt.
		The BFPAAP was not listed as a data source against any constraint type and as such this is a fundamental error in the GBR (2018). As a result of this, parcels GBP_074 and GBP_080 should be discounted. The Council have failed to demonstrate exceptional circumstances required to remove these parcels from the Green Belt. The BFPAAP identified areas that could potentially accommodate some small-scale development. Therefore, the Council have failed to make a balanced approach.	Development can still take place within the Bold Forest Park. However, any development must also meet and satisfy both the policies in the Local Plan and the BFPAAP.
		The initial GBR (2018) set out an extremely limited criteria base, so as to assess the suitability of sites in terms of their importance to the Borough's Green Belt. The review appears to have discounted/included sites on that basis only.	Comments noted.
		There are inconsistencies between the different studies in the review of the landscape character and value of Green Belt. The recommendations made by technical reports are not being acted upon and as a result the argument for exceptional circumstances is flawed.	Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>The GBR (2018) produces land for almost 3,000 dwellings, what is the need for safeguarded sites given the housing requirements will be lower than 468. If we assumed that 8HS was entirely in Windle it would increase Windle by 28%. If we assumed that 8HS was entirely in Eccleston it would increase Eccleston by 25%, which isn't sustainable.</p>	<p>When reviewing the Green Belt boundary, national policy states that when altering these boundaries regard should be given to their intended permanence in the long term, so they can endure beyond the plan period. NPPF Paragraph 139 instead requires that when amending Green Belt boundaries Plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". Therefore, the Council took the positive step to allocate sufficient land for not just this Plan period, but the following too.</p>
		<p>Objects to omission of Stage 2B assessments from the GBR (2018). The omission of this information from the document adds to a lack of transparency in the formulation of the LPSD, nor can the GBR (2018) be properly evaluated.</p>	<p>Comments noted.</p>
Chapter 1: Introduction			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Introduction	RO1116	<p>Objects to paragraph 1.11, this is incorrect as there are no exceptional circumstances to justify altering the Eccleston Park (Ref: GBP_087) Green Belt boundary. The GBR (2018) is flawed in many ways and does not provide adequate evidence to support the change in status to safeguarding of land.</p>	<p>The GBR (2018) sets out a robust approach to determine which sites should be released from the Green Belt.</p>
Chapter 2: Methodology			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Methodology	RO0052, RO0110, RO0146, RO0620, RO0621, RO0731, RO0767, RO0849, RO0850, RO0851,	<p>The scoring mechanism used is entirely subjective. The methodology would not stand up to a repeatability and reproducibility (R&R) assessment. The assessments have not been applied consistently across the board which has led to inconsistencies in the output.</p>	<p>The GBR (2018) sets out a robust approach to determine which sites should be released from the Green Belt. Its methodology also takes relevant policies in the NPPF (2018) into account.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

	RO1178, RO1179, RO1184, RO1782	Does not agree with discounting purpose of Green Belt number 5, the regenerating of derelict land. By ignoring this purpose, the Local Plan is by default adding to the problem of regeneration and not encouraging the recycling and reuse of such land. This point was recognised in the LPPO 2016 (Para 4.45 – Alternative Option 3), which reviewed the option to reduce the proportion of brownfield land and increase the amount of Green Belt. It was rejected due to the recognition that developers would favour green sites due to ease of development and would adversely affect brownfield development. This only adds to and perpetuating the problem of town centre regeneration.	Comments noted but the reason for discounting both purposes 4 & 5 are clearly set out in paragraphs 2.13 and 2.14 of the GBR (2018).
		In respect of boundary features (paragraph 2.19), underground features have not been considered, although they do represent long-term defensible boundaries. In addition, parcels should have been identified by land ownership to provide a more balanced assessment.	Comments noted. However, as clearly set out in paragraph 139, part f) of the NPPF “ <i>define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</i> ” Similarly, to identify parcels of land via land ownership, would not have promoted sustainable patterns of development in line with paragraph 138 of the NPPF.
		Objects to omission of Eccleston in the bullet point list below paragraph 2.20. Eccleston Park has very much its own identify and character. It is considered that this a major omission and flaw in the GBR (2018), given that GBP_087 currently stops the distinct settlements / communities in Rainhill and Eccleston Park from merging into one another and creating a single community, and helps to avoid ‘urban sprawl’.	Although Eccleston Park currently lies in a Green Belt ‘gap’ between Eccleston Park, West Park, Rainhill and Whiston, this gap has already been significantly reduced due to the merging of Eccleston Park, Rainhill and Whiston.
		No methodology has been laid down for assessing the sites. Parcel GBP_098 (site 8HS) has been safeguarded even though it has a number of issues and does not meet the requirements of exceptional circumstances. Parcels have been selected to meet pre-determined criteria. The score of ‘medium’ is questionable. Overall it should have been scored as Limited and therefore is a clear candidate to be discounted.	Comments noted. However, the reasoning for safeguarding the site is clearly set out in the GBR (2018).

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Chapter 3: Development of Methodology			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Development of Methodology	RO1513, RO1825	Concerned about the methodology adopted in the GBR (2018), which does not robustly assess Green Belt sites and has a confusing Stage 3 methodology not in line with best practice.	The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West. The GBR (2018) clearly sets out the methodology and reasoning behind decisions. Chapter 3 also sets out the differences in the slightly revised methodology from the 2016 GBR and the latest GBR (2018).
Chapter 4: Results of Stages 1A, 1B, 2A and 2B			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Results of Stages 1A, 1B, 2A and 2B	RO1951, RO1952, RO0875	Object to the inconsistencies with very subjective scorings and findings. It is almost as if some parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale have been documented to produce the desired results.	Comments noted.
		Regarding Green Belt parcels GBP_074 & GBP_080, the Bold and Clock Face action group has conducted an assessment of the GBR (2018) and highlights that the land cannot be justified in the removal from the Green Belt as the rating of the land against the purposes of the Green Belt, according to them, scores High+ when considered as a whole. They also state that protection against climate change and flood risk has been ignored during Stages 3 and 4 of the assessments of the location in the GBR (2018). The action group consider that the removal of these parcels will result in the amalgamation of several settlements. Impacting on the openness of the countryside, pollution and wildlife. Development of these parcels will also lead to urban sprawl and countryside encroachment issues are also raised.	Comments noted. Policy LPC12 seeks to ensure that new development will not cause an unacceptable risk of flooding and sets out the requirements for developers to demonstrate how flood risk will be addressed. It also confirms that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.

Chapter 5: Ranking and Refinement of Results			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Ranking and Refinement of Results	RO0098, RO0283, RO0674, RO0675, RO0935, RO1098,, RO1116, RO1156, RO1244, RO1677, RO1946, RO1952, RO1958, RO1959, RO1961	The Council received a number of representations against the findings/results of specific sites, which have been summarised below in parcel order.	
		Parcel GBP_006_A & sub parcels GBP_020_D & E Objects to the approach taken in the Plan's assessment of the suitability of GBP_006_A & sub parcels GBP_020_D & E for release from the Green Belt as it is not proportionate and consequently those sites have not been robustly assessed. The NPPF states that "Local planning authorities should approach decisions on proposed development in a positive and creative way". This has not been done with regards to the GBP_006a and sub parcels GBP_020_D & E.	Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding these sub-parcels.
		Sub-parcel GBP_006_C Green Belt parcel GBP_006_C was discounted at Stage 2A as highways access is considered to be 'not feasible'. The exclusion of this land parcel at Stage 2A is not well founded as the land can be accessed using existing routes and any new housing development would lie in a highly sustainable location. Parcel GBP_006_C is a more sustainable option for housing growth in Rainford than the land parcel proposed for allocation (GBP_019_A) where there are potential constraints associated with landscape sensitivity, the relationship to a listed building and the proximity to protected trees and it is less well contained by existing development and landscape features.	It is accepted that if adequate access could be gained to GBP_006_C then it would be a better location for development than site GBP_019_A. However, suitable highway access and egress cannot be made, therefore the sub-parcel will not be taken forward.
		Sub-parcel GBP_010_A Agree with the Stage 1B findings. Do not understand how the Council has concluded that the site has 'limited' development potential, and as such the rationale provided is not justified.	Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding this sub-parcel.
		Sub-parcel GBP_11_C In discounting parcel GBP_011c, the GBR (2018) recognises that it was previously proposed for safeguarding in the LPPO but has since	Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding this sub-parcel.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>been assessed as having a number of constraints that would impede upon its net deliverable area. The GBR (2018) states that cumulatively, these impacts mean that the parcel would not be suitable for release from the Green Belt. Subsequently, whilst recognising the constraints of the parcel, a 'Development Framework Document' has been submitted that indicated those areas that could be developed, as well as how a development could be assimilated within the landscape, and the wider social and environmental benefits that development at that location would offer. The representation is accompanied by a technical report and detailed flood plan, which demonstrates that the area at risk of flooding is substantially less than that indicated by the EA.</p>	
		<p>Sub-parcel GBP_019_A There are inconsistencies in the scores for agricultural land, sub-parcels GBP_019a and GBP_019b should have been given the same score. Sub-parcel GBP_019_A is close to the Rainford Industrial Estate where an explosion took place. The highway junctions are dangerous and will only get worse. The site is poorly serviced by rail.</p>	<p>Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding this sub-parcel.</p>
		<p>Sub-parcel GBP_019_B The reduction in housing numbers conflicts with the previous agenda of economic growth. The reduced amounts of safeguarded sites may require a further GBR (2018) sooner than anticipated. Allocation of the site offers a supply in the short and medium term.</p>	<p>Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding this sub-parcel. There has been a reduction in the housing number, however an uplift has also been included, to account for the Council's proposed economic growth.</p>
		<p>Sub-parcel GBP_029_B There is no justification to score the site a 'Medium' in relation to safeguarding the countryside from encroachment, when it was scored a 'Low' in the 2016 GBR. Appears to be an error as the adjoining sub-parcel scores a 'Low'.</p>	<p>Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and based on a robust methodology.</p>
		<p>Parcel GBP_033 Supports the proposed release of the GBP_033 (Ref: 2ES) from the Green Belt, as this will not result in urban sprawl, the coalescence of neighbouring settlements or the encroachment into the countryside.</p>	<p>The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub-parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>The Council has overstated the Green Belt contribution made by site 2ES. The site is evaluated within the GBR (2018) as part of a wider land parcel including land to the North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high', i.e. that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 – preventing neighbouring towns merging - is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.</p> <p>The Council's decision to safeguard rather than allocate the site is unsound. Its reasoning is flawed and not supported by robust evidence. The decision is also highly detrimental and inconsistent with the Plan's stated strategic objectives.</p>	<p>in other Green Belt reviews by nearby local authorities in the North West.</p>
		<p>Parcel GBP_034 Object to the GBR (2018) and the assessment of parcel GBP_034. The new parcel boundary has had serious implications for the way in which this parcel has been assessed in the GBR (2018) given that the site was merged with a larger area of Green Belt which is of a different character.</p> <p>The conclusions of the GBR (2018) therefore do not accurately reflect the reality of, which is very different in character to the remaining areas of GBP_033. It is considered that parcel's GBP_034 contribution to the purposes of Green Belt and its residential development potential is much greater than the remaining portions of GBP_033.</p>	<p>The NPPF states that when defining boundaries, local planning authorities should: <i>"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."</i> For this reason, in delineating the parcels and sub-parcels, the Council has considered existing boundary features according to whether they form 'strong' or 'less strong' boundaries.</p>
		<p>General comment on Haydock parcels Green Belt parcels GBP_031, GBP_032 and GBP_033 (site Ref: 4EA, 5EA, 6EA and 2ES), continue to contribute to the division of neighbouring communities, which should be maintained.</p>	<p>Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		Development of these sites will lead to urban sprawl, air quality issues and undermines the regeneration of brownfield sites. Local authorities desire to maximise their business rates risks the quality of life for all local communities.	development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality. The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.
		Parcel GBP_036 Peel challenges the methodology that has been adopted to appraise the most suitable land to be removed from the Green Belt to meet the Borough's development needs. From the initial stage of the methodology (Stage 1A), the Council has not suitably identified appropriate parcels and sub-parcels which has subsequently led to inaccurate assessments of land, including Haydock Point South. Peel has previously promoted the land at Haydock Point South for development and as such the GBR (2018) should have acknowledged this land as an individual parcel, not just within the wider assessment of Parcel Ref. GBP_036. If the site had been appraised on its own merits, it is evident that the GBR (2018) should have reached a different conclusion in respect of its contribution to Green Belt purposes and the sites development potential, the overall score for the site would have been higher, and in excess of the alternative sites that have been proposed for release from the Green Belt within the Plan.	The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.
		Parcel GBP_044 The parcel should have been given a 6 in the GBR (2018), rather than a 5. The evidence regarding highway constraints cannot be regarded as robust as there is just one example of highway constraint and a lack of technical evidence. Our Transport Representations Appraisal in response to this concludes that the Council's concerns in relation to the surrounding highway network are unfounded, and, consequently, highway constraints do not prohibit the developability of the parcel.	Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		Noise attenuation measures would be factored into the site and as such would not affect the deliverability. To conclude, we do not consider there to be a sound evidential basis for the Council's conclusions set out in Table 5.4 of the GBR (2018).	
		Sub-parcel GBP_45_A Agree with the Stage 1B findings. It is not clear from the evidence base why the parcel has been split into two separate entitles. Consider that the parcel should be assessed as having 'good development potential' for the purposes of the site selection process and consider the whole site should come forward as an allocation.	There is an area of historic landfill to the south of the site, which may not be suitable for residential development.
		Sub-parcel GBP_053_A As an alternative to allocating the site for housing, Haydock Green should be allocated for employment land. It is a suitable site with strong market appeal. It would facilitate a strategic objective, to improve Junction 23 of the M6. Peel proposes that the A49 could be diverted to the west of J23 utilising land at Haydock Green and within its control. This diversion would be incorporated as part of the development of the site. Peel's proposed site at Haydock Green presents a sustainable residential development opportunity, the allocation of which would address a number of deficiencies identified in the plan, particularly regarding the spatial distribution of residential development, the need for more effective co-location of residential and employment land and the quantitative under allocation of housing land. The site would realise significant highways and transport benefits in delivering part of the desired improvement works to Junction 23 of the M6.	The Council can meet its needs for employment development up to 2035 and beyond elsewhere within the Borough without Haydock Green being allocated or safeguarded. The Council can meet its needs for housing development up to 2035 and beyond elsewhere within the Borough without Haydock Green being allocated or safeguarded for development. The reasons why specific sites are not considered suitable for allocation or safeguarding are set out in the St Helens GBR (2018).
		Sub-parcel GBP_054_C Largely support the methodology as set out in the GBR (2018), however believe the assessments of both GBP_053_C and former LPPO HS06 sites are not justified, and that these sites should be allocated to meet the housing need.	The Council can meet its needs for housing development up to 2035 and beyond elsewhere within the Borough. The reasons why specific sites are not considered suitable for allocation or safeguarding are clearly set out in the GBR (2018).
		Sub-parcel GBP_069_B The GBR (2018) Stage 1B assessment of sub parcel GBP_069B	The methodology utilised in the GBR (2018) specifically in relation to the identification of Green Belt parcels and sub

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>against the five purposes of Green Belt has been carried out inaccurately and inappropriately. Discounting the sub parcel at Stage 2A of the GBR (2018) is flawed as it is based on a historical Local Wildlife Site designation that is now outdated and invalid.</p> <p>Discounting of sites due to a Local Wildlife Site designation is contrary to national policy, which is clear that Green Belt designations are not to be used where standard development management policies would offer the necessary protection.</p>	<p>parcels, is robust and is informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>
		<p>Sub-parcel GBP_069_A & Parcel GBP_071 The GBR (2018) concludes that parcels GBP_69a and GBP_71 should remain in the Green Belt. However, that conclusion does not take into account the history of the parcels, their former status as disused industrial land and, the potential that development of the land could have to aid regeneration.</p>	<p>Sub-parcel GBP_069_A was historically a brownfield site, however, has been fully restored and is now an allocated Nature Improvement Area.</p> <p>Parcel GBP_071 has been discounted on Green Belt purposes, notwithstanding its previous status.</p>
		<p>Parcel GBP_074 The parcel covers a patchwork of habitats, many of which are considered priority and as such should be safeguarded, which makes the GBR (2018) flawed. Failure to adopt the recommendations of the Ecological Network Development report will result in the loss, fragmentation or isolation of priority habitats. Furthermore, development of these sites will compromise the bridleways and greater areas of green infrastructure, which will be reduced to accommodate footpaths and other routes.</p> <p>The conclusions for both Purposes 2 & 3 are incorrect. The settlement of Burtonwood was not considered when the site was assessed against Purpose 2 as it is an essential gap. Similarly, the boundaries are not considered strong that would prevent urban sprawl or safeguard the countryside from encroachment, when considered against Purpose 3, as the parcel has open views. The parcel should therefore have been scored a High+ and discounted at Stage 1B. However, as this did not occur the parcel should then have been discounted at Stage 2A as it falls within the Bold Forest Park boundary.</p>	<p>Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.</p> <p>The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>Parcel GBP_078 With regard to parcel GBP_078 the GBR (2018) is flawed from Stage 2B onwards. The sites have been considered against a criteria which is not standard practice for a Green Belt review and go beyond the scope of what such a review is intended to do. The sites have been assessed on the findings of Stage 2B, and the GBR (2018) provides no explanation as to how these findings have been reached. Site GBP_078 is a well contained site and scores low in Stage 1B, however in Stage 2B the site scores poorly and is deemed to have limited development potential. Therefore, disagree with these findings.</p>	<p>The reasons why this parcel was given a limited development potential is set out in Table 5.4. The Council stands by the conclusions reached following the assessment of the parcel.</p>
		<p>Parcel GBP_082 The sites removal from Green Belt would undermine the strategic area of Green Belt.</p>	<p>The sub-parcel has positive attributes that supports its release from the Green Belt. However, it is considered more appropriate to safeguard the site in order to help meet the post Plan period needs rather than as an allocated site.</p>
		<p>Sub-parcel GBP_085_A This site was discounted at Stage 1b, which resulted in former HS24 site being dropped. The 2016 GBR gave it a low contribution result. If development were to take place, there would still be a significant strategic gap between both settlements.</p>	<p>Comments noted, however, the Council stand by the conclusions of the GBR (2018) regarding this sub-parcel.</p>
		<p>Sub-parcel GBP_085_C The new parcel boundaries has influenced the results, and as such this site is now considered to make a minor contribution to the Green Belt, which is self-fulfilling.</p>	<p>The NPPF states that when defining boundaries, local planning authorities should: “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” For this reason, in delineating the parcels and sub-parcels, the Council has considered existing boundary features according to whether they form ‘strong’ or ‘less strong’ boundaries.</p>
		<p>Sub-parcel GBP_085_C It is clear that the site has been scored incorrectly due to its consideration with the neighbouring site, which are not relevant. Therefore, this land should be scored higher and be promoted as an allocated site. Question the Council’s site selection method.</p>	<p>The site was considered on its own merits, as a sub-parcel within a larger parcel. The area around this site (Thatto Heath) has been subject to an extensive amount of development over recent years. There are substantial opportunities for re-development of previously developed sites including site 9HA. Therefore, to ensure an appropriate phasing of development</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>Following on from our own site assessment, the results are good if not better than all of the sites included for allocation within the Plan.</p>	<p>within the area it was considered more appropriate to delay any further development in this area until after the Plan period.</p>
		<p>Parcel GBP_087 Agree that the site's removal from Green Belt would not have an impact on the 5 purposes of Green Belt. The site has strong boundaries and would not result in the merger of settlements as there is no-longer any visual separation. The site lies in the heart of the built-up area and lacks openness. There is no historic urban part of St Helens in proximity to the site.</p> <p>Parcel GBP_087 would provide additional flexibility during the Plan period and beyond, and development within the site could be phased to ensure that new housing is brought forward in a managed way.</p> <p>Parcel GBP_087 is surrounded by built development and would provide a natural rounding of the settlement. The development of GBP_087 would not represent an incursion into open countryside, unlike safeguarded sites 1HS, 2HS, 4HS, 5HS 7HS and 8HS.</p> <p>Parcel GBP_087 was proposed as an allocated site (Ref: HA8) in the LPPO, nothing has materially changed in terms of the physical characteristics of the site since then to warrant the parcel being "downgraded" to safeguarded land. The GBR (2018) suggests that there are constraints, but these are over-played and not correctly balanced against the planning merit of bringing forward the site for development compared against other sites that have been taken forward as allocations in the Plan period.</p> <p>The GBR (2018) suggests that the reduced amount of new housing now being identified has led to a change of view relating to this parcel of land. However, it is not clear as to the reasoned planning justification for a reduced level of housing, and there appears to be no evidence as to the reasons for the exclusion of GBP_087 as an allocated site, which is arguably a more sustainable and suitable housing site than others that have been retained from those proposed in the LPPO. Whilst the SA does provide an assessment of the reasons for the allocation, safeguarding or discarding of sites</p>	<p>Support noted, however, the Council stand by the conclusions of the GBR (2018) with regard to this sub-parcel.</p>

		<p>(Table 6.3 - housing and employment), there is no clear assessment of the relative or comparative merits of the potential housing sites to determine why some housing sites are considered worthy of allocation and others safeguarded.</p> <p>The GBR (2018) indicates that the transport network would be a constraint on this parcel. However, this could be addressed through a Masterplan for the site, wherein detailed assessments can be made. In addition, the development of the site could be phased so as to ensure that the highways impacts can be properly managed, and the necessary infrastructure put in place to mitigate any adverse impacts. These details can be assessed at the planning application stage in the normal way. It is not considered that access represents a strategic and insurmountable impediment to the development of this parcel. This site was considered as part of the TIA to support the LPPO. The individual site assessment findings (Table 10 in the Forecasting Report) confirms that this site fares no worse and in some criterion fares better in terms of its accessibility to alternative modes of transport than the alternative former Green Belt sites allocated for the current Plan period.</p>	
		<p>Parcel GBP_087</p> <p>Objects to the allocation of GBP_087 (site 3HS) on the grounds that the landforms an important Green Belt purpose in that it separates two communities of Eccleston Park and Rainhill. It also helps to retain character and identity for Rainhill and Eccleston Park, rather than the housing estates simply running into one another to create an anonymous urban sprawl. Losing this open space, whether in 15- or 50-years' time, will affect the feel, character and attractiveness of the whole area, and impact the quality of life for all local residents.</p> <p>The parcel performs a significant task in Green Belt terms as it separates St Helens from Rainhill and Prescot. The GBR (2018) does draw on this but is inconsistent and has erroneous conclusions. Parcel GBP_086 scores 'high' in terms of Green Belt purpose 2, whereas parcel GBP_087 scores a 'low' on all Green Belt purposes. Visual perception should not have influenced the Council's conclusions. Only a small strategic gap will be left should this site be</p>	<p>Although Eccleston Park currently lies in a Green Belt 'gap' between Eccleston Park, West Park, Rainhill and Whiston, this gap has already been significantly reduced due to the merging of Eccleston Park, Rainhill and Whiston.</p> <p>The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		removed. The impact of the Green Belt in this area also impacts on neighbouring authority Knowsley, removing this site will result in a small playing field being left in the Green Belt.	
		Sub-parcels GBP_090_B & GBP_090_C There are no allocations in Rainhill, therefore, the GBR (2018) conflicts with Policy LPA02 of the LPSD.	Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The proposed sites identified for development have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
		Parcel GBP_098 Overall the GBR (2018) takes a robust approach and strongly support the conclusions of the review in relation to this parcel. Disagree with the conclusions set out in Table 5.4. The parcel has good transport links and accessible to local facilities. It has a low contribution towards the purposes of the Green Belt and would provide a critical mass of development. The site would provide education facilities and a green corridor. Additional work by Vectos demonstrates access routes through the site would not impact on the local network but significantly improve it. Public transport is achievable and is practical and viable.	The Plan's housing and employment allocations have been through vigorous SA's and Strategic Environmental Assessments to address any social, economic and environmental impacts from the development. Sustainable transport is addressed in Policies LPA07 and LPA08. Whilst Policy LPA02 states that <i>"high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth"</i> .
		Parcel GBP_098 Parcel GBP_098 has no access to rail, with a dependency on car travel. Existing traffic congestion will be further exacerbated. Parcel GBP_087 has a significant development restriction due to similar traffic issues but the Council have been inconsistent in not applying a similar restriction on 8HS. The site is a flood plain and the FRA sequential testing has not been undertaken. The HRA indicates that further work should be undertaken regarding European protected species. There are public footpaths across the site. The release of this parcel will see the built-up area sprawl up to the boundary with the A580 and will see the loss of a large area of	Parcel GBP_087 has significant highway constraints that have meant that its overall capacity will have to be capped. Parcel GBP_098 does not have the same highway constraints. Windle Brook runs through the site, which is in Flood Zone 3, however the parcel is not a designated flood plain. It is the Council's intention to retain Public footpaths, albeit some may have to be re-routed accordingly. The proposed housing sites are well-related to the existing built-up areas. Whilst some loss of agricultural land will occur, this is justified by other sustainability factors. The GBR (2018)

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>countryside, conflicting with Green Belt policy. The site contains high quality agricultural land which would be a great loss, not just for its beauty but for its food production. Safeguarding the site will invite developers to put pressure on the Council to build on the site sooner. Local roads would not be able to cope with additional traffic. Bus services have significantly decreased. The site is a functionally linked habitat for a number of bird species.</p> <p>Some Green Belt sites are just wasteland, this parcel is clearly not.</p> <p>There are inconsistencies between the different studies in the review of the landscape character and value of Green Belt. The recommendations made by technical reports are not being acted upon and as a result the argument for exceptional circumstances is flawed.</p> <p>Parcels GBP_005 and GBP_098 should have been treated the same in the GBR (2018). Similarly parcel GBP_010 has the same traits as GBP_098 and should have been treated in the same manner.</p>	<p>sets out how the sites to be removed from the Green Belt have been selected.</p> <p>Comment noted.</p>
		<p>Parcel GBP_099 Objects to the south-eastern parts of GBP_099 (developed land comprising dwellings fronting Moss Lane and adjacent to St Helens Road) having been retained in the Green Belt. This is a substantial suburban area of c.170 houses and two businesses. It is not a village in the countryside (there is "more tarmac than open field").</p> <p>None of the five purposes of Green Belt are met in this location. The GBR (2018) did not make specific reference to this particular location.</p> <p>"Normal" planning policies would be "sufficient" in this location.</p> <p>It is perverse to allocate large areas of open farmland (and a former golf course) that raise strong objections and will only cater for volume housebuilders, yet at the same time retain areas within the Green Belt such as that identified here: in this case, that designation serves no useful purpose and is unnecessarily restrictive.</p>	<p>Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		There are inconsistencies in the scores for agricultural land when reviewing parcels GBP_019_A, GBP_087, GBP_082_A, GBP_085_C & GBP_098.	Comments noted. However, there has been no error or inconsistencies with regard to the scores given regarding agricultural land. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.
Chapter 6: Recommendations			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Recommendations	RO0080, RO0065, RO0175, RO0176, RO0177, RO0311, RO0328, RO0707, RO0789, RO0853, RO0855, RO0907, RO0981, RO1160, RO1609, RO1811, RO1945	The Council received a number of representations regarding some of the minor adjustments to the Green Belt boundary. These representations have been summarised below.	
		<p>Site AC03 – as a neighbouring resident for many years, I was told by the former owners of the Hall that no parts of the estate would be down-graded for development purposes. This proposal would contradict what I was given to understand.</p> <p>Agree that the existing Green Belt boundary appears misaligned, however do not understand why the structure and land around including curtilage buildings should not be kept in Green Belt. The new boundary is flawed. Representor has suggested a new aligned boundary. Various planning applications have been approved on the site including a large conservatory.</p> <p>Object to the removal of this AC03 site as it will lead to redevelopment of the site and the introduction of new buildings that will be out of keeping with the existing listed buildings to the detriment of surrounding properties.</p>	The Hall is a Listed Building, and therefore the buildings within the grounds are listed by association. Any proposed development within the site will be subject to the policies of the Local Plan including Policy LPC11, which addresses impacts on heritage assets.
		Site AC05 – support the removal of this area of Green Belt (formerly HA9) due to its location surrounded on 3 sides, and along approximately two-thirds of its length, by the existing urban area. There are also a number of "urbanising features" that distinguish it from the adjacent agricultural fields. These include several buildings,	Support noted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>an electricity substation, and a tarmac access road; its openness and contribution to the Green Belt are therefore limited.</p> <p>The re-designation of AC05 creates a shorter and more rational Green Belt boundary in this location. The new boundary would be a continuation of the existing Green Belt boundary line that runs from the south west towards Houghtons Lane. The existing access road is also flanked by hedgerows and a number protected trees, which could be supplemented with further planting to create a strong and permanent boundary to the urban edge.</p>	
		<p>Site AC06 – a number of local residents and the Parish Council have objected to the removal of this site from the Green Belt on the following grounds:</p> <ol style="list-style-type: none"> 1. The proposal is unsound and does not comply with the NPPF. The local planning policies are not lawful; 2. The Council have incorrectly defined an anomaly of boundary and they have been misleading in the process. The proposed changes are said to affect 38a, 38 and various outbuildings at Barrows Farm, Carr Mill Road, Billinge. This is incorrect as no.38 lies in a different part of Carr Mill Road in Billinge there is no number 38a. Errors such as this highlight a lack of due diligence, the Council are inviting representations based on incorrect information; 3. There is no clear objective, or justification that is viable in terms of planning policy; 4. This land should remain as Green Belt; 5. The Council have failed to comply with the NPPF; 6. Residents objections were not taken into account at the LPPO stage, and no reference to the objections was made in The Report of Consultation (December 2018); 7. The Planning department have allowed a number of planning applications on this site. There are no 'exceptional circumstances' to warrant the removal of this site from the Green Belt; 8. Green Belt boundaries are meant to be permanent. The Green Belt Boundary here is already established and defined. If there is 	<ol style="list-style-type: none"> 1. All policies adhere and compliment national policy both in the NPPF and PPG; 2. This is a typographical error and should have read 83 & 83a Carr Mill Road; 3. The site is significantly developed and as such is not considered to fulfil the purposes of Green Belt. As the Council are carrying out a comprehensive review the opportunity was taken to identify other (mainly small) areas where corrections are required to the existing Green Belt boundary, this site being one identified; 4. Comment noted; 5. Comment noted; 6. Residents comments were received and considered in the preparation of the LPSD, however only the main issues raised by representations were referred to in The Report of Consultation (December 2018), and this was not considered a main issue; 7. Green Belt designation would have been considered at planning application stage; 8. National planning policy allows Councils to review and amend Green Belt boundaries as part of the Local Plan process; 9. Policy LPA07 addresses the issue of traffic impacts from development; 10. The wording used in the GBR (2018) is consistent with policy and other local authority Green Belt reviews;

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>no proposal to develop the land then it is not necessary to re-define the boundary;</p> <p>9. There are highway issues which are dismissed by both the planning and highways departments. Traffic will also become worse if the boundary is changed;</p> <p>10. Wording regarding AC06 suggests only a movement of the boundary and reference to map is required to understand the full impact. This could be interpreted as being a deliberate intention to mislead. It is the reclassification of a large piece of land as brown belt, something that the wording about site AC06 fails to mention or make clear, reference to a map elsewhere in the appendix is necessary to understand what is proposed;</p> <p>11. The Council has not adhered to the standards laid down in its SCI. Members of the public were not aware of the consultation;</p> <p>12. Development on this land would lead to enclosure of the land. Public access may also become limited as there is a footpath within the area proposed to be removed from the Green Belt;</p> <p>13. The Parish Council believe that removing this site from the Green Belt would lead to encroachment. There is history with this site and removing this area from the Green Belt would lead to development becoming more easier to gain;</p> <p>14. Removal of this site is likely to ruin the open rural aspect of the land;</p> <p>15. There are no exceptional circumstances to alter the boundary. Preparing a new Local Plan is not an exceptional circumstance, and the reasons cited by the Council would not pass the exceptional circumstances test;</p> <p>16. What is capable of amounting to exceptional circumstances is a matter of law, the Green Belt has already been established and it requires more than general planning concepts to justify an alteration. There has to be a necessity;</p> <p>17. The proposal is against the Council's policy to minimise the removal of Green Belt land;</p> <p>18. The Green Belt boundary shouldn't be realigned as proposed. It should follow the rear boundaries of 83 and 83a Carr Mill Road. This would give a clear visible boundary on the ground;</p>	<p>11. The Council has adhered to the methods of consultation as set out in the SCI. With an added step of contacting all residents within a 50m radius of a proposed Anomaly Correction site via letter advising them of the proposed change;</p> <p>12. The existing Public Right of Way will remain in situ;</p> <p>13. Comment noted.</p> <p>14. The proposed new boundary is tight to existing building with no open space being removed.</p> <p>15. The Council considers that exceptional circumstances exist to remove this site from the Green Belt;</p> <p>16. Consider the proposed amendment to the boundary is in line with paragraphs 136 and 139 of the NPPF;</p> <p>17. The site is not being allocated for development, but rather as development has already taken place on the site the Green Belt boundary is being amended to better define the Green Belt in this location;</p> <p>18. Comment noted;</p> <p>19. Comment noted</p> <p>20. The site was assessed as part of the GBR (2018), hence the proposed boundary change;</p> <p>21. The Plan is aligned with the NPPF (2019) especially paragraph 139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "urban sprawl" and help to strengthen the protection for the remainder of the Green Belt;</p> <p>22. Comment noted;</p> <p>23. Any proposed development on that site would have to adhere to all planning policies within the Local Plan;</p> <p>24. This is the first comprehensive Green Belt review the Council have undertaken since the Green Belt was first established. The Core Strategy when adopted did state that a review of the Green Belt would be required to identify areas for future housing and employment needs. As part of that comprehensive review, the Council took the opportunity to identify other areas where the Green Belt boundary needed to be rationalised;</p>
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ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>19. The fact that the site is already significantly developed is misleading. The buildings have been there for the past 30 years;</p> <p>20. There is no evidence that the Council has met identified requirements for sustainable development or even whether the land was subject to assessment;</p> <p>21. Removal of this site will lead to urban sprawl;</p> <p>22. Council Planners cannot say that a boundary is wrong. Another planner may take an entirely different view;</p> <p>23. If removed from the Green Belt almost anything could be built on that site, which could cause infrastructure problems;</p> <p>24. When consent was given for the dwellings on that site, it was not considered necessary at that time, why should it be now? Why change a boundary when no development is being planned?;</p> <p>25. Barrows Farm is one site, it makes no sense to divide it into two parts. Any new development on the brownfield site would cause harm to the Green Belt;</p> <p>26. This is an unnecessary proposal which if allowed will have a detrimental impact on the wider area.</p>	<p>25. Comment noted;</p> <p>26. Comment noted.</p>
		<p>Site AC10 - The Council wants to remove school from the Green Belt and close the school so the land can be sold to developers for housing. Housing will increase cars and traffic. Traffic has increase and causes delays on Blackbrook Road.</p>	<p>The Green Belt designation washes completely over the high school, which sits on the edge of the urban area and is largely covered by school buildings and associated hardstanding's. Therefore, it is considered that this site no-longer meets the purposes of the Green Belt.</p>
		<p>Site AC11 - Object to the removal of this land from the Green Belt. The highway access is not adequate for vehicles and water supply in the area is not acceptable.</p> <p>Object to the removal of this site as, national policy determines that land within a village boundary or settlement would constitute sustainable development. The proposed change to push back the Green Belt for the entire plot of land would create and allocate land suitable for development without full assessment of its suitability in accordance with the requirements set out within the NPPF and PPG.</p> <p>The NPPF identifies the importance of identifying small and medium sized sites for homes. However, these should be identified through the development plan or brownfield registers, not through changes to</p>	<p>The current Green Belt boundary in this location is poorly defined and follows no visible boundary. It is recommended that the boundary be realigned to follow stronger features on the ground.</p> <p>Policy LPC06 addresses the need to protect biodiversity including wildlife.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>the Green Belt boundaries. Also, the creation of a developable area should only be undertaken if there is a prospect of the land being developed. We feel that the site is not developable, and therefore the Green Belt boundary should not be altered.</p> <p>The site's present status may perform an "ecological function" that may be lost if it is developed.</p>	
		<p>GBP_029_A - There is an area of land in the Park Industrial Estate, Garswood that should be removed as it no-longer meets with the purposes of Green Belt. The site is part of a haulage yard and has been since 2005 and is immune from enforcement action.</p>	<p>Comment noted. The Green Belt boundary encompasses an area of land currently used as a haulage yard with no defined visible Green Belt boundary. It is recommended that the boundary be realigned to follow stronger features on the ground.</p> <p>MODIFICATION No. AM085</p>
Chapter 7: Appendices			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
Appendices	RO0175, RO0311, RO0707, RO0674, RO0675, RO0875, RO1098, RO1634, RO1677, RO1804	<p><u>Appendix C</u></p> <p>Objects to removal of parcel GBP_087 (Eccleston Golf Course site) from the Green Belt whilst there are objections to the sites development from Sport England which require further investigation and evidence to justify safeguarding of the land for residential development.</p>	<p>This site has now been safeguarded (ref: 3HS). Sport England has raised no objections to the site as part of this consultation process.</p>
		<p>Page 382 should state that the parcel GBP_087 bounds onto the Liverpool to Wigan line not to the Manchester line.</p>	<p>This is a typographical error and should read "The <i>parcel</i> <i>bounders</i> the Liverpool to Wigan Northern Railway line".</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>Page 383 (not page 385 as written), states that there is no longer a strategic gap between Eccleston, Rainhill and Whiston. Object to this statement as the land clearly provides a clear well defined and important border between Eccleston Park and Rainhill which is not moderate to weak given it runs along a significant portion of Portico Lane and separates the two communities. If this land is developed the identities of Rainhill and Eccleston will be lost.</p> <p>It is also considered that this matter has been greatly exaggerated in order to support the Council's wish to remove this sites Green Belt status.</p>	<p>Comment noted, however, although Eccleston Park currently lies in a Green Belt 'gap' between Eccleston Park, West Park, Rainhill and Whiston, this gap has already been significantly reduced due to the merging of Eccleston Park, Rainhill and Whiston.</p>
		<p>The GBR (2018) identifies site GBP_053_C (Ref: 2HS) as making only a moderate contribution to preventing two settlements merging. This does not recognise that the sub-parcel is productive arable land, producing annual food crops. We should not be removing our ability to continue using this valuable resource. Any development on this site will have an impact on the natural habitat and food sources of the wildlife in the area.</p>	<p>The proposed housing sites are well-related to the existing built-up areas. Whilst some loss of agricultural land will occur, this is justified by other sustainability factors.</p> <p>Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.</p>
		<p>The assumptions made regarding site GBP_001_A (former LPPO HS19 site -) are incorrect. We consider that for Purpose 1 the site should score a 'Low' instead of a 'Medium'. For Purpose 3 the site should score a 'Low' instead of a 'Medium'. We disagree that both sites (GBP_001_A & GBP_002) have limited development potential, and both sites should at least be designated for safeguarding. The lack of proformas (Stage 2B) renders it impossible to undertake a comparable and fair assessment of our two sites. A number of comments in Table 5.4 are incorrect or not appropriately evidenced and as such we have concluded that both sites should score a 6 and be allocated for residential development.</p>	<p>Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>The wording in the GBR (2018) is, in places, misleading and disingenuous in stating that sub-parcel GBP_074_D has or includes:</p> <ul style="list-style-type: none"> • "a strong boundary to the east" • "old coal mining buildings" • "new development". 	<p>The GBR (2018) does refer to "disused colliery building, and associated structures situated in the southern eastern corner" for which planning permission has been granted for 19 dwellings, which is factually correct. But it does not reference a strong boundary to the east.</p>
		<p>Agrees with the assessment that considers GBP_048 to be of 'Low' value to all purposes of including land within the Green Belt; and that overall it makes a 'weak' contribution to the Green Belt.</p>	<p>Comment noted.</p>
		<p>The assumptions made regarding parcels (GBP_090B & GBP_090C) contained in Appendix C are incorrect. We consider that for Purpose 1 both sites should score a 'Low' instead of a 'Medium'. For Purpose 2 both sites should score a 'Medium' instead of a 'High'. Both sites should progress to Stage 2A, were there are no prohibitive constraints and so should proceed to Stage 2B and consequently Stage 3. The lack of proformas renders it impossible to undertake a comparable and fair assessment of our two sites.</p>	<p>Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>
		<p><u>Appendix I</u></p> <p>Site AC06 - there are no exceptional circumstances to justify the revision of the Green Belt boundary as there is no development proposed. The existing boundary line follows the pattern of the road and if amended development is more likely to occur.</p>	<p>Comments noted. The assumptions and conclusions made throughout the GBR (2018) are consistent and sound. The methodology is robust and informed by national Green Belt policy contained within the NPPF and has similarities with those used in other Green Belt reviews by nearby local authorities in the North West.</p>

ECONOMIC VIABILITY ASSESSMENT (EVA)			
SECTION	CONSULTEE (Representor)	MAIN ISSUES RAISED	COUNCIL RESPONSE/AMENDMENTS MADE TO LOCAL PLAN
General Comments on the EVA	RO1154, RO1949, RO1959	The site allocation (site 9EA) is supported within the EVA. Yields for industrial accommodation have improved in recent years (linked to improving local market conditions). This site is clearly well located and configured to accommodate demand for employment development over the plan period, especially if Class B1 uses and access to Pasture Lane are also permitted. The site will significantly improve the supply of employment land in this area to meet demand.	Comments noted.
		EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10-unit scheme. However, viability results and construction costs within the EVA relate to a 15-unit scheme, and the typology in EVA Table 3.5 requires correction. The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with net developable area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		It is noted that three of the council's site allocations are over 20 ha. It is anticipated that sites above this threshold will include larger areas of constraint and as such will be required to provide greater areas of public open space. A net developable area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		EVA Table 3.13 sets out a summary of the key plan policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		EVA Appendix 4 contains details of residential land sales. The residential land sales table displays affordable housing zone; address; location; developer; site type; no. of units; net area (ha); price paid; price (per net ha); price (per net acre); and date of acquisition. Sources of data are stated as Land Registry, EGi and Co-Star. Peel is not aware that such data sources can provide the net developable area of sites, and the source of such data must be stated to ensure that accuracy and consistency can be checked.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		The residential land sales evidence within EVA Appendix 4, containing 17 records, suggests combined £per net acre average prices of £160,696 per acre (Zone 1), £285,848 per acre (Zone 2) and £695,204 per acre (Zone 3). The data is heavily weighted towards brownfield sites. Twelve entries are pure brownfield transactions. There are four entries of a greenfield/brownfield mix, which are all within Zone 2 and present average of £251,768 per acre. There is only one pure greenfield entry: Zone 2 at £213,656 per acre.	Please see Appendices 21 & 22, for the full response made by Keppie Massie regarding comments submitted Grasscroft Solution's Ltd. and Turley.
		The data presented in the EVA is insufficient to support the benchmark land value assumptions adopted for greenfield sites and the land sales evidence does not provide a sufficient evidence base to justify the adoption of differential brownfield and greenfield benchmark land values.	Please see Appendices 21 & 22, for the full response made by Keppie Massie regarding comments submitted Grasscroft Solution's Ltd. and Turley.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		It is both our and Peel's experience that greenfield land owners will have very strong expectations in respect of the value of their land within the development market and, if it is deemed appropriate for their land to be released for residential development, they will see no reason why they would achieve a lower price than would be achieved for a similar parcel of previously developed land.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley..
		Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. The provision of appraisals and cash flows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with Plan policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a “ <i>premium above prevailing values</i> ” is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows within their testing. Peel request that evidence of Keppie Massie’s experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites.	Please see Appendix 22, for the full response made by Keppie Massie regarding comments submitted by Turley.
		In respect of Affordable Housing, EVA Paragraph 5.38 states that the values adopted are based on the likely bids by a Registered Provider and reflect evidence of sales values for affordable stock. The EVA adopts 45% of market value for Affordable Rent and 70% of market value for Affordable Home Ownership. No evidence is provided to support the proposed affordable housing values. It is the opinion of Turley and Peel that current offers from active Registered Providers for Affordable Home Ownership schemes would equate to 65% of the market value and a reduction in this tenure pricing is requested.	Please see Appendices 21 & 22, for the full response made by Keppie Massie regarding comments submitted Grasscroft Solution’s Ltd. and Turley.
		Despite being referenced within PPG as “ <i>appropriate data</i> ” for use in undertaking viability assessments, Keppie Massie consider that RICS BCIS construction cost data is not an appropriate basis for the assessment of construction costs for the EVA.	Please see Appendix 21, for the full response made by Keppie Massie regarding comments submitted by Grasscroft Solution’s Ltd.
		EVA Paragraph 5.40 states that the adopted construction costs have been prepared by Keppie Massie’s own quantity surveyor (QS) and their methodology and cost assessments are contained within EVA Appendix 5.	Please see Appendices 21 & 22, for the full response made by Keppie Massie regarding comments submitted Grasscroft Solution’s Ltd. and Turley.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

		<p>Profit level is set out within EVA Paragraph 5.68 as equating to 17.5% of GDV applied to smaller housing schemes of 10 or less dwellings. For scheme assessments which include no on-site affordable housing, Peel regards the proposed level as low, overstating viability in comparison with the widely accepted minimum industry profit level of 20% of GDV. EVA Paragraph 5.76 states that, in the context of most forms of commercial development, the developer will typically seek a profit requirement of approximately 15% on cost. This figure was applied to all forms of non-residential development for testing and is regarded as insufficient, falling below the widely accepted commercial profit requirement equating to 20% on cost.</p>	<p>Please see Appendices 21 & 22, for the full response made by Keppie Massie regarding comments submitted Grasscroft Solution's Ltd. and Turley.</p>
		<p>The build cost has been set too low. No viability appraisal summaries have been submitted with the EVA, which are key evidence. The opening up costs allowance are also low. The methodology for the dwelling sizes is too simplistic. Benchmark land values are low, finance costs for small developers should be increased to represent the higher costs they incur. Developer profit margins of 20% should be adopted for all developments.</p>	<p>Please see Appendix 21, for the full response made by Keppie Massie regarding comments submitted by Grasscroft Solution's Ltd.</p>

APPENDIX 1: LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT SCOPING STAGE (REGULATION 18)

(N.B. 120 'private' individual names have been excluded from this list)

A Crithcley & Sons Accent North West Accountable Officer for St Helens CCG AIDAPT Aimia Foods Limited Al Amin Indian Takeaway ALG Investments Alliance Planning Alps Group Ltd Altius Property Development LLP Anchor Housing Trust Ancient Monuments Society Ansar Homes Ltd Ansdell Villas Road Residents Association Arriva North West & Wales Arts Council North West Ash Grove Farm Ashfield Ashtons Green Community Allotment Ashurst T & R Ashurst Tenants & Residents Assoc Avalon town Planning & Architectural Design Consultants Avenbury Properties Banks Property Group Barratt Homes - Planning Manager Barratt Homes (Manchester) Barrow & Cook Barrow Farm Barton Willmore Planning Partnership Bell Ingram Bellway Homes Ltd (North West Division) Beresford Adams Bidwells Billinge Chapel End Parish Council Billinge Community Library Billinge Historical Society Billinge Tenants and Residents Association	Bizspace Bloor Homes BNP Paribas Real Estate Bold heath Equestrian Centre Bold Parish Council Bond Byran Bovis Homes Bradford & Northern Housing Association Bridgewater Trust Brimble Lea & Partners British Trust for Conservation Volunteers North West Region Broadway Malyan Ltd Brunswick Road Tenants and Residents Association Bryant Homes North West Ltd Buckingham Portfolio Management Ltd Burtonwood & Westbrook Parish Council C B Richard Ellis Ltd CA Planning Caddick Development Canal & River Trust Canter Levin & Berg Cantra New Street Tenants and Residents Association Carr Mill and Clinkham Wood Tenants & Residents Association Carter Jonas LLP Cass Associates Cass Associates CGMS Consulting Chair of Ansdell Villas Road Residents Association Chair of Friends of Victoria Park Chair of Learning in St Helens Group Chair of Safer St Helens Group Charlton House Farm Cheshire Police Cheshire West and Chester Council
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ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Chester Lane Centre Local History Group	DPP One Ltd
Chris Thomas Ltd	Drivers Jonas Deloitte
Church Commissioners for England	DTZ
Civic Trust (Northern Office)	E Cook & Sons
Civil Aviation Authority	Easter Developments Ltd
Civitas Planning	Eccleston Hall Management Company
Clark Planning Consultants Ltd	Eccleston Parish Council
Cliff Walfingham	Elan Homes
Commercial Estates Group	Electricity North West
Common Estate Tenants and Residents Association	Electrovision Ltd
Communities Agency	Elm Construction
Concept Developments	Emersons
Cornell Group	Emery Planning Partnership
Cory Environmental	English Heritage (North West Region)
Cosey Homes	Environment Agency
Cottrell Commercial	Environmental Advisory Service (EAS)
Council for The Protection of Rural England (CPRE) (Lancashire Branch)	ESSAR OIL UK (formerly SHELL UK) (c/o Bell Ingram)
Country Land and Business Association	Fairhurst
Countryside Properties	Fire & Rescue Service
CPRE	Fisher German
Croft Parish Council	FJH Associates Ltd
Cronton Parish Council	Forestry Commission
Cuerdley Parish Council	Forster and Company
Culcheth & Glazebury Parish Council	FPCT LLP
Cunningham Planning	Frank Marshall and Company
Dalton Warner Davis LLP	Frost Planning Ltd
David L Shaw town Planning Consultant	Fusion online limited
David Wilson Homes	G L Hearn Property Consultants
De Pol Associates Ltd	G V A Grimley
Deloitte Real Estate	Garswood Community Library
Derek Hicks & Thew Partnership	Garswood Gates Farm
Design Council	Gladman Developments
Development Executive	Great Sankey Parish Council
Development Solutions	Greater Manchester Police
DfT - Regional & Local Transport Delivery	Greater Manchester Police Commissioner
Dickman Associates Ltd	Green Edge
Diocese of Liverpool	Green Pastures
Director of Commissioning for NHS England (Merseyside)	Gregory Gray Associates
Disability Advice & Information St Helens	Greystar Europe
Dixon Webb Property Consultants	GVA Grimleys Ltd
DK Architects	Halton & St Helens VCA
DPDS Consulting Group	Halton Borough Council
Harris Lamb	Halton Primary Care NHS Trust
	KKA Ltd

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Hammerson PL Hate Crime Co-ordinator HCA Helena Housing Helena Partnership Henderson Homes Ltd C/o Agent Heys House Farm Higham & Co Higher Barrowfield Farm Highway Authority (Cheshire West & Chester) Highway Authority (Halton) Highway Authority (Knowsley) Highway Authority (Lancashire) Highway Authority (Liverpool) Highway Authority (Sefton) Highway Authority (St Helens) Highway Authority (Warrington) Highway Authority (Wigan) Highway Authority (Wirral) Highways Agency Himor Group Holliss Vincent Holmes-Antill Home Builders Federation Ltd Homes & Communities Agency Hourigan Connolly Housing 21 How Planning Hutchinson 3G UK Limited ID Planning Improving St Helens Indigo Planning Ltd J Murphy & Sons Ltd JASP Planning Consultancy Ltd JB & B Leach JLPS Job Centre Plus Jones Homes Jones Lang Lasalle JPE Consultancy JWPC Ltd KDP Architects Keith Swain Design King Sturge LLP	Knowsley MBC Lambert Smith Hampton Lancashire County Council Lancashire County Property Group Lancashire Police Lancashire Wildlife Trust/The Wildlife Trust for Lancashire, Manchester and North Merseyside Langtree Group plc Lawrenson Associates Legh Family Estates Leith Planning Ltd Lex Northwest Ltd Liverpool Airport Plc Liverpool City Council Local Development Plans Local Enterprise Partnership Local Nature Partnership Lowe Property Developments Ltd Marine Management Organisation Marshall Surveyors Matthews and Goodman LLP Mayor of London Maypole Barn MCP Planning Meller Braggins Mersey Forest Mersey Valley Golf and Country Club Ltd Merseycare NHS Trust Merseyside Fire & Rescue Authority Merseyside Industrial Heritage Society Merseyside Police Merseyside Police (St Helens) Merseyside Traveller Forum Irish Community Care Merseyside Waste Disposal Authority Merseytravel Michael Sparks Associates Miller Homes Mineral Products Association Mobile Operators Association c/o Mono Consultants Ltd Morley Estates
Morris Homes Morston Assets Ltd	Powergen Prescot town Council

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

MPSL Planning and Design Ltd Nathaniel Lichfield Partnership National Electricity Power Authority National Farmers Union National Federation of Gypsy Liaison Groups National Grid National Housing Federation Natural England NBS Construction Network Rail Newton and Earlestown Community Group Newton le Willows Friends & Residents Association Newton Residents Association NHS Halton & St Helens NHS North West NHS Property Services NLP North West Ambulance Service North West Museum of Road Transport Npower Renewables Ltd NW Planning Aid O2 Office of the Police and Crime Commissioner for Merseyside Open Spaces Society Orange PCS Ltd Osborne Clarke Owen Ellis Architects P Wilson & Company Parkside Action Group PCT Peacock and Smith Ltd Peel Investments (north) Ltd Peel Land & Property Penketh Parish Council Persimmon Homes Philips Ryley & Co LLP Pickard Finlason Partnership Pilkington PLANIT-IE Planning Aid Planware Ltd	Principal Arts Officer (Acting) Promised Land Farm Property Surveyor Rainford Allotment Association Rainford Civic Society Rainford Community Library Rainford Hall Estate Ltd Rainford Parish Council Rainhill Civic Society Rainhill Parish Council Rainhill Railway & Heritage Society Rapleys LLP Red Bank Schools Ltd Red Delph Farm Redcat Property Investments Ltd Redrow Homes (Lancashire) Ltd Redrow Homes (North West) Ltd Renova Developments Revelan Group Revelan UK Ltd RG+P Riverside Rocktownsend Roman Summer Associations Ltd Rowland Homes Royal Society for the Protection of Birds (RSPB) Russell Homes (UK) Ltd Salvation Army Housing Association Sanderson Weatherall LLP Sankey Canal Restoration Society Savills Sefton Council Seneley Green Parish Council Sherdley Estates Sherdley Remec Ltd SHINE Showmen's Guild of Great Britain Silcocks Amusements Simonswood Parish Council Smiths Gore Social Care Housing & Health
Directorate Spawforth Associates	The Gypsy Council for Education Culture Welfare and Civil Rights

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Sport England (North West)	The Haydock Park Racecourse Company Ltd
SSA Planning	The Mersey Forest
ST Group LTD	The Office of Rail Regulation
St Helens & Knowsley Hospital Trust	The Planning Studio
St Helens Age Concern	The Stanley Estate & Stud Company
St Helens CEN Coordinator	The Theatres Trust
St Helens Chamber	The Winwick Educational Foundation
St Helens Coalition of Disabled People	The Woodland Trust
St Helens College	Thomas Jones & Sons
St Helens District Sports Council	Torus Housing
St Helens Heritage Network	Transport for London
St Helens Historical Society/St Helens Assoc. for Research into History	Traveller Law Reform Project and Friends, Families and Traveller
St Helens Multi-Cultural Group	Tree tops
St Helens Chamber of Commerce - Director of Business Services	Turley Associates
St Peter's C.E. Primary school	Unifrax Ltd. (UK)
St Helens Cooperative Community Members Group	United Co-op Ltd (Property Division)
St Helens Green Party	United Utilities PLC
St Helens LSP	United Utilities Property Solutions
Steven Abbott Associates	Upholland Parish Council
Stewart Ross Associates	Viridor Waste Management
Storey Homes	Vodafone
Sustainability Forum	Wainhomes (North West) Ltd
Sustainable St Helens Forum	Wainhomes Developments Ltd
Suttons Group	Walton & Co (Planning Lawyers) Ltd
Suttonside Farm	Warrington Borough Council
Swindell's Roofing	West Lancs District Council
T Mobile UK Ltd	Whiston town Council Offices
T&TK Drinkall	White Peak Planning
Taylor Wimpey UK Ltd	White Young Green
Taylor Woodrow Developments Ltd	Wigan Council
Taylor Young	William Fishwick & Son Ltd
Temptation House	Willowbrook Hospice
Terence O'Rourke	Windle Farm
Tesni Homes	Windle Parish Council
The Barracks	Winwick Parish Council
The Coal Authority	Wirral MBC
The Garden Centre Company c/o Gregory Gray Associates	Woodhouse Farm
The Garden History Society	Woodland Trust
The Gauchwin Group	Woodland Trust - Government Affairs Officer (Local)
	Worthington Land Settlements

APPENDIX 2: SCOPING LETTER ON HOW THOSE BODIES AND PERSONS WERE INVITED TO MAKE REPRESENTATIONS UNDER REGULATION 18



St. Helens Council

ADDRESS

Chief Executive's Department
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

Contact: Planning Policy
Tel: 01744 676190
Email: planningpolicy@sthelens.gov.uk

DATE

Our ref:

Your ref:

Consultation on the St. Helens Local Plan Scoping Document and Bold Forest Park Area Action Plan Publication Draft - Invitation to Comment

Dear Sir/Madam,

St. Helens Council is preparing a new Local Plan for the borough of St. Helens. The new Local Plan will set how much new development for housing, employment and other uses should take place in the borough, where development should take place and set out policies to be taken account of when assessing planning applications for development.

The Council will be publishing the St. Helens Local Plan Scoping Consultation Document for public consultation¹ on **Wednesday 20th January 2016** and would welcome comments from you or your organisation on the content of the document. The Council wants to hear which issues are important to residents, businesses and other groups, what the plan should contain including which policies the plan should include and which sites - in urban areas and the Green Belt - should be developed or protected. There is also opportunity to provide comments on the draft Sustainability Appraisal (SA) Scoping Report. All comments should be received by no later than **12:00 noon on Wednesday 2nd March 2016**.

The Council has also reached the final stage of preparation for the Bold Forest Park Area Action Plan (AAP) - which aims to encourage recreation, leisure and economic growth in the area around Bold and Sutton. The AAP will form part of the Development Plan for St. Helens once it is adopted, and will be used to assess planning applications in the Bold Forest Park area, alongside other existing Plans for the borough such as the Core Strategy Local Plan and Saved Unitary Development Plan policies.

The Council proposes to submit the Bold Forest Park AAP to the Government for independent examination² by a Planning Inspector along with the required supporting documents. Prior to this, the Council are inviting representations to be submitted by the public and other interested parties on whether the Bold Forest Park AAP is legally compliant and sound. The representations will be submitted with the AAP and considered by a Planning Inspector.

The Bold Forest Park AAP and supporting documents will be published on **Wednesday 20th January 2016** for a six week period³. Should you wish to make representations, you must do so before **12:00 noon on Wednesday 2nd March 2016**. There is also the opportunity to state if you wish to take part in

¹ In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

² Under Section 20 of the Planning and Compulsory Purchase Act 2004

³ In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

ST HELENS BOROUGH LOCAL PLAN 2020-2035 CONSULTATION STATEMENT (MARCH 2020)

examination hearing sessions set to take place this summer. All comments should be received by no later than **12:00 noon on Wednesday 2nd March 2016**.

The consultation documents for both plans are available to view or download on-line at: www.sthelens.gov.uk/planningpolicy, or to view at the Regeneration Reception, Ground Floor, Town Hall, St Helens (Mon-Fri 9am-5pm), and at all St Helens libraries (see the Council's website for opening hours www.sthelens.gov.uk, or they can be obtained by calling 01744 676190 - charges may apply).

Comments can be made using official response forms and returned via the addresses shown below.

By email to: planningpolicy@sthelens.gov.uk or
By mail to:
Freepost RLYY-RYXG-HYHS
St Helens Metropolitan Borough Council
Chief Executives Department,
Town Hall, Victoria Square, St Helens, WA10 1HP

For further information on the above, contact the Planning Policy Team by: Telephone: 01744 676 190
Email: planningpolicy@sthelens.gov.uk
Post: Development Plans, St Helens Council, Town Hall Annexe, Victoria Square, St Helens, WA10 1HP

Please note that comments received will be made public. Anonymous comments will not be accepted. All information provided will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St Helens Local Plan and the Bold Forest Park AAP. However, your name and representation will be made publicly available and cannot be treated as confidential.

If you have any queries regarding the consultation, please contact: 01744 676190, or you can email us at planningpolicy@sthelens.gov.uk.

Yours faithfully,



Mark Dickens
Head of Regeneration

APPENDIX 3: LOCAL PLAN SCOPING CONSULTATION RESPONSE FORM



St. Helens Local Plan Scoping Consultation

January 20th - March 2nd 2016

Response Form

By completing this Response Form, you are writing to make comments on the proposed Scope of the new St. Helens Local Plan. If you wish submit information as part of the 2016 Call for Sites or representations on the Bold Forest Park AAP Publication Draft, there are separate forms available for these that must be completed separately.

For help in completing this form, please contact a member of the Development Plans team by telephone on 01744 676190 or email planningpolicy@sthelens.gov.uk.

Your contact details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact. Please be aware that anonymous forms cannot be included and that in order for you to submit your form you must include your details below.

	Your details	Your agent's details
Title		
Name		
Position		
Organisation		
Address		
Town		
County		
Postcode		
Telephone		
Email address		
<p>Would you like to be updated of future stages of the Local Plan Process? Please tick one below.</p> <p>We will update you when there are consultations on the Local Plan document, submission of the Plan for Examination, the issuing of recommendations by the Inspector and the adoption of the Plan by the Council. The Planning Policy website will also have more regular updates. We prefer to send any updates by email as this is faster, cheaper, more environmentally friendly and stays with you if you move home.</p>		
<input type="radio"/> Yes, by email	<input type="radio"/> Yes, by post (I do not have an email address)	<input type="radio"/> No

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

The following questions relate to the various section of the Local Plan Scoping Consultation Document available to view and download at <http://www.sthelens.gov.uk/planningpolicy>.

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q3. Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. *Please tick one box and explain why below. Please be as specific as possible regarding the changes required.*

☐ Yes

☐ No

Comments:

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required. Please tick one box and explain why below. Please be as specific as possible regarding the changes required.

☐ Yes ☐ No

Comments:

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. Please tick one box and explain why below.

☐ Yes ☐ No

Comments:

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say? Please tick one box and explain why below.

☐ Yes ☐ No

Comments:

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this? Please tick one box and explain why below.

☐ Yes ☐ No

Comments:

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens? Please tick one box and explain why below.

☐ Yes ☐ No

Comments:

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target?
Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q.12 What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens?
Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q.13 Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement?
Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?
Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs?

Comments:

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q18. Are there any other forms of development that need to be accommodated in the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q19. Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q20. Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q21. Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Any Other Information

Please tell us anything else of relevance, if not already covered above. Please continue on a separate sheet, if necessary.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Please return this form and accompanying sheets/maps, etc. by
12:00 (noon) on Wednesday 2nd March 2016 by email or by freepost to ensure
your comments are fully considered in the next stages of the Local Plan.

<i>Return by email to:</i>	<i>Return by freepost (no stamp required) to:</i>
planningpolicy@sthelens.gov.uk	St. Helens Council Freepost RLYY-RYXG-HYHS Chief Executive's Department, Development Plans, Town Hall, Victoria Square, St. Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the St. Helens Local Plan.

Data Protection Statement

The personal information provided on this form (address, contact details, signature) will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St. Helens Local Plan to adoption. However, your name and representation will be made publicly available and cannot be treated as confidential.

St.Helens Council offers a translation and interpretation service covering foreign languages, British Sign Language, Braille and audio tape.

For a translation of any St.Helens Council publication, please provide your name and address and the name of the language you require to the Contact Centre, quoting the title and/or reference number of the document.

Jeśli chcieliby Państwo otrzymać tłumaczenie jakiegokolwiek publikacji Rady St Helens, prosimy o podanie nazwiska, adresu i nazwy wymaganego języka do Centrum Kontaktowego, podając tytuł i/lub nr referencyjny dokumentu.

Para recibir una traducción de cualquier publicación del St Helens Council (Consejo del municipio de St Helens), por favor indíquenos su nombre y dirección y el idioma con el que se comunicará con el Contact Centre (Centro de Contacto), así como el título y/o el número de referencia del documento.

St Helens کاؤنسل کی کسی بھی اشاعت کے ترجمہ کے لئے، براہ مہربانی رابطہ مرکز کو اپنا نام اور پتہ دیں اور اس زبان کا نام جس میں ترجمہ کی ضرورت ہے، اس دستاویز کا عنوان اور/یا حوالہ نمبر دیتے ہوئے۔

St Helens कॉउन्सिल के किसी प्रकाशन के अनुवाद के लिए कृपया संपर्क केन्द्र को अपना नाम, पता और उस भाषा का नाम जिसकी आपको आवश्यकता है, डाक्यूमेंट का नाम तथा संदर्भ संख्या को उद्धृत करते हुए दें।

若要获取 St Helens 委员会任何刊物的译文，请将您的姓名、地址和语言 种类告知“联系中心”，并注明文件标题和/或编号。

Para sa pagsasalin ng kahit na anong publikasyon ng St Helens Council, paki paalam ang inyong panaglan at address at ang pangalan ng lenguwaheng kailangan niyo sa Contact Centre, paki saad ang titulo at/o numerong reference ng dokumento.



Contact Centre, Wesley House, Corporation Street,
St.Helens, Merseyside WA10 1HF.



Tel: (01744) 456789
Minicom: (01744) 671671
Fax: (01744) 456895



contactcentre@sthelens.gov.uk



www.sthelens.gov.uk

APPENDIX 4: POSTER FOR SCOPING STAGE

St.Helens - Plan for Change

St.Helens Council is preparing a new Local Plan for the whole Borough. It will say how much new development for housing, employment and other uses there should be and where it should take place, and set out policies to be used to assess planning applications for development.

The Council are undertaking a public consultation to hear what residents, organisations and businesses think and have produced a consultation document which asks a series of questions, including what the Plan should contain, what its objectives should be and what evidence should support it. Your responses will then help shape the next stage of Local Plan - the Preferred Options - which will be published in Autumn 2016.

At the same time, the Council is running a 'Call for Sites', where you can suggest sites in the Borough that you would like to see developed for housing, employment, shops or other uses, even if they are currently in the Green Belt. Alternatively, you can suggest sites that you think should be protected from development.



You now have six weeks to make your views and suggestions heard.

The consultation will run from Wednesday 20th January 2016 and close at 12noon on Wednesday 2nd March 2016.

All documents are available on the Council's website: **www.sthelens.gov.uk/planningpolicy**, at St.Helens Council libraries and St.Helens Town Hall.

If you have any questions about the documents, please contact the Planning Policy Team on: **01744 676190** or **planningpolicy@sthelens.gov.uk**



**St.Helens
Council**

APPENDIX 5: NEWSPAPER ARTICLE AT SCOPING STAGE

6
NEWS

Have Your Say on Local Plans!

St Helens Council wants to hear opinions on the forthcoming St Helens Local Plan - and on the final version of the Bold Forest Park Area Action Plan.

The Council is preparing a new Local Plan which will set out how much new development for housing, employment and other uses should take place in the Borough, where development should take place and set out policies to be taken account of when assessing planning applications for development. The Council has also reached the final stage of preparation for the Bold Forest Park Area Action Plan - which aims to encourage recreation, leisure and economic growth in the area around Bold and Sutton.

The Council wants to ensure that this generation - and those in the future - have the best possible choice of housing and jobs, together with a good quality environment. The comments it receives on these plans will help to make this happen.

To respond to the consultations, the Council asks that you fill in the official response forms. These, along with the consultation documents for both plans will be available at all Council libraries, St Helens Town Hall and online at: www.sthelens.gov.uk/planningpolicy.

All comments must be received by noon 2nd March 2016.

**Bold Forest Park
Area Action Plan**

THURSDAY, JANUARY 21, 2016

SHS sthelensstar.co.uk

Joy as hospital is given top rating

'Outstanding' care at
St Helens Hospital

By Paula Morris
paulamorris@sthelensstar.co.uk

ENGLAND'S Chief Inspector of Hospitals has judged St Helens Hospital "outstanding", making it one of just three hospitals of its type nationally to be rated at this level.

Acute hospitals like St Helens are those intended for short-term medical or surgical treatment for adults.

Meanwhile, the inspection - carried out by the Care Quality Commission (CQC) - rated Whiston Hospital as "good" overall, but with maternity and gynaecology services "requiring improvement".

And St Helens and Knowsley Teaching Hospitals NHS Trust - the managing body for both hospitals - was also awarded an overall rating of "good" with an "outstanding" level of patient care.

Areas of outstanding practice across the trust included a bed score assessment tool developed in-house and areas for improvement included the staffing mix



St Helens Hospital has won an 'outstanding' rating

five-star patient care. The report is a reflection of the high standards that the trust board and all our staff aspire to provide for every patient, every time they have contact with any of our services."

Following publication of the CQC report The Chief Inspector of Hospitals, Professor Sir Mike Richards, said the trust is one of the best in the country.

He added: "Throughout our inspection we witnessed exemplary patient-centred care. Patient safety and positive experiences were key priorities for the trust and underpinned all aspects of service planning and delivery."

A team of inspectors visited the two hospitals in August 2015.

Catlin completed
for Made By Design award

247

**APPENDIX 6: SUMMARY OF REPRESENTATIONS ON ST.
HELENS LOCAL PLAN SCOPING CONSULTATION 20TH
JANUARY – 2ND MARCH 2016**

St. Helens Local Plan 2018 - 2033

Summary of Representations on St. Helens Local Plan Scoping Consultation 20th January – 2nd March 2016



St. Helens
Council

Summary of Representations on St. Helens Local Plan Scoping Consultation

1. Introduction

- 1.1 A full public consultation was held on the Local Plan Scoping Document for a six week period between 20th January 2016 and 2nd March 2016. The consultation asked residents, businesses and other groups which issues are important and what the new Local Plan should contain. This included views on planning policies and which sites - including those in urban areas and the Green Belt - should be developed or protected.
- 1.2 A total of 212 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period.
- 1.3 The consultation asked 21 questions in relation to the Scoping Document. A summary of the key issues raised for each question along with the Council's response is provided below.
- 1.4 The comments received have been taken into consideration in the preparation of the 'St. Helens Local Plan Preferred Options November 2016' which is referred to throughout this report and should be read in conjunction with this report.
- 1.5 The comments received in relation to the 'Sustainability Appraisal (SA) Scoping Report December 2015' have been taken into consideration in preparation of the 'St Helens Local Plan Sustainability Appraisal: Interim SA Report December 2016'. This Interim SA Report has been referred to in relation to Questions 19-21 and should also be read in conjunction with this report.

2. Summaries of Comments and Council Response

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations?

Response	Number
Yes	37
No	53
Not Specified	122

Summary of Comments

From those consultees who considered that process was appropriate, the following points were made:

- It provides the opportunity for all parties to identify the main issues in broad terms.
- Based upon the information available the process appears to be appropriate and therefore should meet relevant requirements of relevant legislation and regulations.
- It should now be a priority for the Borough to progress the Local Plan swiftly to adoption to provide certainty and to plan positively.
- The proposed course of action is consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- National policy is clear that early and meaningful collaboration with neighbourhoods, local organisations and businesses is essential and a wide selection of the community should be engaged. The steps identified by the council in the preparation of the Local Plan meet the requirements of the Planning Acts and Regulations.
- The preparation of a new up to date Local Plan which accords with the NPPF is the right approach for the Borough. It will ensure the Local Plan is up to date and capable of meeting development needs. It provides an important opportunity to establish a vision and action plan which can deliver the sought after step change in economic performance and to secure a sustainable future for people living in the borough and provided certainty.
- There is a clear and pressing need to progress the identification of sites for allocation for housing and employment uses, and for Green Belt release to accommodate housing and employment growth needs of the Borough – given the passage of time since the adoption of the Core Strategy in 2012 and the changed circumstances in terms of development requirements particularly for employment land, and reflecting the Government's aims to have full Borough wide Local Plans in place by 2017 (including identification of land allocations).
- St Helens adopted a Core Strategy on October 2012 only six months after the publication of the NPPF and significantly in advance of many subsequent pieces of case law which have provided a detailed understanding of how the policies of the NPPF should be interpreted and applied. In particular the CS evidence base was prepared significantly before the publication of the NPPF as such was not prepared in accordance with the NPPF and is not considered to be up to date.
- The consultation process has been over a long enough period to allow everyone concerned to respond.

From those consultees who considered that process was not appropriate, the following points were made:

- The proposals are against the core principles of legalisation in the National Planning Policy Framework and Green Belt.
- There is nothing that suggests an entirely new plan is needed this is a waste of valuable public funds and is driving the borough in entirely the wrong direction.
- There is no evidence to restart this process other than an opinion there is a greater emphasis on logistics than what was proposed in the 2012. This is difficult to rationalise given the regional market, economy including Liverpool super port were well understood at that time. This is further complicated by the Liverpool City region devolution agreement formation which is in the early stages of structure which may render much of a new metropolitan borough plan obsolete as devolved strategy and governance matures.
- The NPPF main tenet is that of Sustainable Development. Large scale use of farmland is not sustainable as is increasing the use of congested motorways.
- Certain developments should not be considered e.g. where housing green belt land promised by the government to stay Green Belt It shouldn't now be necessary for a further review and the consequent increase in the area required.
- As well as being against NPPF, this is against the spirit of the (Planning) Act, especially in an environmental role, also closely linking to planning on Green Belt, should be on a case by case, established by facts, not on speculation in advance by developers.
- The Core Strategy was only approved 3 and half years ago. What has changed?
- There has been very little promotion or publicity of consultation.
- Whilst the proposal meets legislative requirements in producing a new Plan, we consider the decision of St Helens Council to abandon the adopted Core Strategy and programmed Site Allocations DPD to be flawed and based on an overly cautious legal opinion. If the Council were to progress to Site Allocations stage, the risk of legal challenge would be minimal. Returning to first principles risks the Plan production being taken out of the Borough's hands as the plan-making period will extend beyond 2017.
- The abandonment of the Site Allocations process will cause immediate uncertainty by the resulting reduction in delivery of new homes and commercial opportunities. This will have unwelcome consequences for the Borough's housing land supply position and will result in a prolonged period of under-delivery.
- The recently adopted Local Plan October 2012 should have had the current issues documented and argued before being submitting for examination with the Planning Inspectorate in June 2011. Although the procedure is technically correct the cost with this current addition to the St Helens' ratepayer shows the adopted Local Plan in 2012 was a waste of time.
- To have a "Preferred Options" consultation later in 2016 based on this Scoping consultation phase ending 2nd March 2016, goes against what Parliament has decided to hold the EU Referendum throughout the country. Therefore, as various aspects of the Scoping consultation concern EU issues; it is best to wait until after the EU stay-in/Leave referendum has been decided by the people of the United Kingdom on 23 June 2016.

- We have concerns regarding the language chosen for the next stage of the Local Plan. The 'Preferred Options' stage, could appear to have a final feel to it, more so than if it were to be called an 'Issues and Options'. The use of the phrase 'Preferred Options' implies that decisions have already been made by the Council.

Council Response

The Council considers that it is undertaking the preparation of the Local Plan in full accordance with the requirements of the Planning Acts and Regulations. In preparing the Plan, the Council must seek to ensure that its policies are in accordance with the National Planning Policy Framework (NPPF) and therefore must achieve all three dimensions of sustainable development: economic, social and environmental.

Regarding the need to prepare a new Local Plan, on 18 November 2015 Cabinet resolved to proceed with a new Local Plan even though the Core Strategy for St. Helens was only adopted in October 2012. This was based on Officers' recommendations and legal advice from Counsel. The new single Local Plan for the Borough will replace the Core Strategy and incorporate the planned content of the Allocations and Sustainable Development Management Local Plans. It was considered that any delay to the completion of a Green Belt review and release of Green Belt land to meet housing need through an Allocations Local Plan was offset by the need to address significant changes in employment land requirements.

A key factor behind this rationale was that employment land was not being taken up for development and research indicated that the quality, site size and location of the existing supply was inadequate. Furthermore, although the housing target had been examined against the NPPF, there was concern that new guidance and case law on setting housing targets had since emerged, suggesting a review of the housing Objectively Assessed Need. This led to the preparation of new housing and employment objectively assessed needs (OAN) studies in 2015, which found that the employment growth needs for the Borough are much greater than the target in the adopted Core Strategy. This has implications for how much development should take place and where, and for the Council's plan making to meet these needs. Local authorities are required to plan positively to meet their identified local needs.

In addition, since the Core Strategy was adopted national policy guidance now places greater importance on demonstrating that sites included in the Council's housing land supply are in fact viable and deliverable within each Council's Local Plan period. The Strategic Housing Land Availability Assessment (SHLAA) is a review of the potential housing sites, including brownfield and greenfield sites. However, the amount of sites predicted to come forward in the 2012 SHLAA has not been fulfilled, so a review has been undertaken and was completed in late summer 2016. It demonstrates that the Council no longer has a five year housing supply, because some of the sites taken into consideration for the Core Strategy have had to be discounted as they have failed to come forward since the adoption of the Core Strategy and have no realistic prospects of being deliverable. This indicates that there is a need to consider Green Belt release to meet housing needs.

In accordance with the plan making regulations¹, the Council is required to consult on the 'draft' stages of the plan. The term 'Preferred Options' is being used as it presents for the next draft stage as it presents what the Council considers to be its preferred approach to various policies and site allocations. This approach is sets out on what the Council considers it needs to do to comply with national policy based on the evidence available and having considered other options.

The Preferred Options is not the final stage of the Plan and by consulting on this draft stage, people are given the opportunity to state whether or not they agree with Council and if they think other alternative options to the ones that the Council are putting forward should be followed instead.

With regards to publicity the Scoping Document, the Council has followed is adopted Statement of Community Involvement which set out the various way and means publicizing consultations on the Local Plan. The Council is committed to ensuring that consultation on the Local Plan are well publicised the will continue to act in accordance with the SCI for future consultation stages.

With regards to the question of the consequences of the EU Referendum, the Council does not consider it appropriate to delay the preparation of the Local Plan to await any outcomes of the UK exiting the EU which remain uncertain at present and will continue to prepare the Local Plan in accordance with the relevant existing legislation and regulations. Any future legislative or regulatory changes with implications for the plan making process will need to be addressed when the full details are known.

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date

Response	Number
Yes	30
No	128
Not Specified	54

Summary of Comments

From those consultees who considered an end date of 2033 was appropriate, the following points were made:

- In line with paragraph 157 of the NPPF, Local Plans should be drawn up over an appropriate time scale, preferably a 15 year time horizon, taking account of longer term requirements.
- It is appropriate for the end date of the Plan to be at least 15 years from its base date. If St. Helens intends to adopt the Local Plan by 2018, then 2033 is an appropriate end date. This follows the same time frame as many other Local Authorities.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

- The Scoping document also indicates a 5 year supply of land to be safeguarded, based on the 15 year requirement. 5 years is sufficient for safeguarded land later in the plan making process once the suitability of the suite of sites has been established.
- There should be provisions for a review of the Local Plan prior to 2033 and also make provisions within the Local Plan to meet housing and employment needs beyond that plan period.
- The Council should look beyond the end date of the plan period to ensure that the Borough's longer term development needs can be met. This is particularly important in undertaking a review of the Green Belt boundaries to ensure that they are capable of lasting beyond the end of the plan period through the identification of safeguarded land.

From those consultees who considered an end date of 2033 was not appropriate or that an alternative date should be used, the following points were made:

- These timescales are far too long and, given the gravity of some of the proposals, they should be subject to more regular scrutiny.
- The timescale should be 2027 as is the original (Core Strategy) plan.
- Shorter, reviewable dates for consideration of the appropriateness of any planned developments would seem to make infinitely greater sense.
- The last plan had nothing like this amount of time. Is it to justify what is likely to happen to this area? How you could get it so wrong last time.
- The needs of the neighbourhood change far too frequently to have this extended to this date.
- I do not believe these plans should be prepared with such elongated dates. Planning laws and environment issues are too fast moving for this approach
- Adding 10 years to the local plan makes it easier to justify taking land out of the green belt. It is clearly unfair to take a huge piece of green belt based on a 20 year dubious forecast
- A 17 year forecast is unreliable and unpredictable and likely inaccurate. A 5 year plan would be more reasonable.
- St Helens council may wish to consider extending the end date of the Local Plan by a year or two as a contingency in case the date of adoption (currently 2018) were to slip. Unforeseen circumstances could potentially delay the adoption of the plan beyond 2018 potentially resulting in a plan period of less than 15 years.
- An end-date for the Local Plan at 2035 would provide for the minimum 15-year lifespan in accordance with NPPF paragraph 157 and sufficiently allow for any unexpected delays that may occur during preparation and/or Examination. This would also avoid the Local Plan underproviding against objectively assessed needs.
- Consideration should be given to extending the Plan period to 2037 to coincide with the evidence base which has assessed housing need (Mid Mersey SHMA 2015) and employment land requirements (St Helens Employment Land Needs Study 2015) over this period. It may also be that the new Local Plan's for neighbouring Halton and Warrington, located within the same Housing Market Area, will also be prepared over this planned period so some consistency here would be beneficial.

- A 5 year safeguarding period is too little when compared to the length of the plan period. In many instances of Local Plans coming forward over the course of the NPPF, safeguarding for an additional 50% of the Plan period has been put forward in similar Local Plans.
- 5 years does not represent a period "stretching well beyond the plan period" as required by the NPPF (p. 85) Whilst there is no specific guidance on how much land should be safeguarded, a number of LPAs have tended to identify at least 10 years worth of safeguarded land to ensure that the Green Belt Boundaries retain a degree of permanence.
- Forecasting employment and development needs up to 18 years ahead (the evidence papers have been prepared in 2015) is too far ahead to forecast. It is well known that the further out you forecast, the more likely you are to be wrong. A better target would be 2028, 10 years ahead of the planned adoption date 2018.

Council Response

The reasons for preparing a new Local plan have been outlined in response to Question 1 above. With regards to selecting an appropriate timespan for the Plan, comments on the ability to plan for such a long period in preference to shorter period are acknowledged. The Council however must consider National Planning Policy Framework (NPPF) which states (at paragraph 157) that a 15-year horizon is preferable. Planning over a longer period allows for strategic needs to be planned for and offers a degree of certainty to communities and developers as to where is and isn't acceptable to develop to meet these needs. The Council considers 2018 to be reasonable start date for the adoption of the plan allowing sufficient time for consultation and examination, therefore taking the plan period up to 2033.

With regards to safeguarding land for development beyond the plan period, paragraph 85 of the NPPF states that where necessary, (local planning authorities should) identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Council agrees with some of the comments regarding five years beyond 2033 for the safeguarding of land (and its removal from the Green Belt) not appearing to be long enough to meet future housing and employment development needs. The Council notes that a period of 10 years beyond the plan period is another common option. A period of 15 years has been used in the Preferred Options as this provides a greater degree of certainty as to where longer term future development should take place, aiding infrastructure planning, and to ensure that changes to the Green Belt endure beyond the plan period.

With regards to the need to review the plan ahead of the 2033 end date, the Council will consider then need for this based upon information that arises as a result of the monitoring of the Plan's performance of the policies.

Q3. Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this?

Response	Number
Yes	85
No	13
Not Specified	114

Summary of Comments

From those who felt that there were other issues, plans and strategies to be taken into account, the following points were raised:

- Concerns over the environmental impact of development including climate change and flooding, water quality, pollution and air quality, loss of agricultural land, ecological protection and heritage loss.
- It is probable that there will be more development and biodiversity and green leisure space will inevitably be compressed. Simply developing on the basis of economic or housing need and hoping the future environment will take care of itself is no longer adequate now with the pace of urbanisation.
- Green Space and corridors should be protected and meticulously planning for the future is imperative. There should also be a green map of interconnecting green corridors containing active biodiversity plans.
- Active Design Principles should be considered to promote healthy communities through good urban design.
- The road network is a breaking point in many areas. The council simply cannot keep overlaying development onto existing road infrastructure and expecting it to cope for commuting, well-being and health issues. The issue of motorway congestion and evidence that this is a negative factor in generating economic growth.
- There should be reference to managing traffic accommodation and ensuring availability of the additional school places, which will undoubtedly be required due to an increased home building programme.
- The Council should ensure all 'brownfield' land is used.
- Housing issues emerging from the Local Plan are also more extensive than simply providing an adequate number of new homes. In line with the NPPF, the Council must seek to boost significantly the supply of housing and provide the size, type and tenure and range of new homes that are required to address local demand.
- The Local Plan should recognise, protect and support community and cultural facilities. The importance of planning for culture and cultural facilities is emphasised in the NPPF by being included as a core planning principle (item 17). This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities.
- Plans to develop a Strategic Rail Interchange at the former Parkside Colliery site as should recognise the locally important battlefield of Winwick (1648) which is under

active consideration by Historic England for inclusion in the list of registered battlefields in England.

- The insufficiency of the evidence base regarding employment which is singular in dimension concentrating too much on logistics. There are opportunities within the wider remit of the Atlantic Gateway such as super high speed broadband and the development of the knowledge sector.
- Of specific relevance to the Parkside site are the City Region reports relating to economic growth, employment land, particularly in relation to the logistics sector (including SuperPort) and emerging studies relating to the Northern Powerhouse and transport links (e.g. Transport for the North (TfN)).
- The Northern Powerhouse agenda and associated investment in infrastructure should be considered.
- Account should also be taken of the future plans and reports/programmes of the Combined Liverpool Regional Authority.
- The need to Duty to co-operate with Neighbouring Local Authorities and other relevant organisations on strategic priorities.

Council Response

The following response takes each 'theme' in turn:

Climate Change and Flood risk

With regards to concerns raised over how the Plan will address climate change and risk of flooding, in consistency with the NPPF, Draft Policy LPD02 in Preferred Options Local Plan sets out the principles of sustainable development that will be applied to all development proposals. A key element to this is the need to be climate change resilient, in particular reducing the risk from all types of flooding and improving water quality. Flood risk in particular has been a key factor in the selection of all allocated sites and where issues have been raised as issues that must be addressed on strategic employment and housing sites.

Draft Policy LPC12, as general policy that will apply to all development, sets out the Council's approach to flood risk and water management. It seeks to ensure that new development will not cause an unacceptable risk of flooding and water quality and sets the requirements from developer to demonstrate how flood risk will be addressed.

Air Quality and Pollution

With regards to the issue of air quality and pollution, this is a cross cutting theme covered by several policies. Draft Policy LPD01 will set out standards to minimise and mitigate to acceptable levels against the effects of air, light and water pollution (including contamination of soil, surface water and groundwater resources) and noise, vibration, smells, dust and electromagnetic fields caused by the development. Draft Policy LPD09 of the Preferred Options Local Plan in particular will require development proposals to specifically address potential impacts on air quality with regard to existing Air Quality Management Areas. Draft Policy LPD11 will require air quality to be considered in relation to health and wellbeing whilst Draft Policy LPA07 will seek to minimise the negative impacts of transport including air

and noise pollution through requiring developers to implement Travel Plans in accordance with the requirements of the Ensuring a Choice of Travel SPD. Furthermore the need to consider potential impacts on air quality has been raised as a key issue that must be addressed on identified strategic employment and housing sites.

Green Spaces and Green Infrastructure Network

With regards to the importance of green spaces and provision of an interconnected green space network, the Council recognises and values the importance of its Green Infrastructure and will actively seek to protect and enhance these sites. The Council's approach to Green Infrastructure has been set out in Draft Policy LPA09 in Preferred Options Local Plan which, amongst other measures, will require development to contribute to the expansion and/or improvement of the functionality and connectivity of the Green Infrastructure network, in accordance with local circumstances. This policy approach also recognises the cross boundary and 'interconnected' nature of Green Infrastructure and sets the Council's commitment to work in partnership with neighbouring authorities to develop multifunctional green corridors. The Preferred Options Local Plan will also identify a strategic network of 'greenways' to be protected from inappropriate development and enhanced. The selection of allocated and safeguarded sites does not involve the loss of Public Open Space or wildlife sites.

Biodiversity

With regards to concerns over impacts on biodiversity, these are understood and noted. The Local Plan will afford significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. The Council's approach to the conservation of biodiversity has been set out in more detail in Draft Policy LPC06 in Preferred Options Local Plan with designations including Local Wildlife Sites, Local Geological Sites and Local Nature Reserves will be identified on the Policies Map. In line with the NPPF, which advises that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity, the Local Plan will also identify Nature Improvement Areas. These are areas in St. Helens that form part of a wider Liverpool City Region 'ecological network' and are opportunity areas for nature improvement and off-site mitigation.

Design Principles

With regards to active design principles being applied, the Council is committed to ensuring the design and layout of new residential development is the highest standard. Draft Policy LPD02 in Preferred Options Local Plan sets the scope of type of requirements expected. This policy will be further refined following public consultation and consideration of relevant evidence and guidance.

Impact on Highways Network

The Council acknowledges that proposed future development will likely have impacts on the existing highway network and accepts that any significant adverse impacts will need to be addressed, and the nature of the mitigation will need to be assessed to be feasible.

Alongside the preparation of Local Plan, the Council will also prepare an Infrastructure Delivery Plan. This will set out the key infrastructure requirements necessary for development to take place. The Council's approach to the delivery of infrastructure has been set out in Draft Policy LPA08 in Preferred Options Local Plan which will require, where appropriate, developer contributions to fund necessary improvements.

With regards to concerns raised over the impacts of future housing and employment development on the motorway network, the Council will need to take full consideration of the responses made by Highways England as a statutory consultee on the allocation of sites with regard to the Road Investment Strategy.

Schools

The housing development proposed in the Local Plan is likely to have impacts on existing schools and may require additional capacity to be provided at existing schools or even require the creation of new schools. The exact impact will vary according to the occupancy and capacity of existing schools, which varies over time, and on the exact nature of the housing provided on sites (family housing, retirement housing, etc.). As this may change over the life of the plan a flexible approach must be taken. Alongside the preparation of Local Plan, the Council will also prepare an Infrastructure Delivery Plan. This will identify the key infrastructure requirements, which includes schools, necessary in order for development to take place. The developers of new sites will be expected to make a significant contribution to any creation of new school places and may be required to provide space for new schools on their sites. The Council's approach to the delivery of infrastructure has been set out in Draft Policy LPA08 in Preferred Options Local Plan which will require, where appropriate, developer contributions to fund necessary improvements.

Development on Brownfield Sites before Green Belt

With regards to continuation of the use of previously developed land ("PLD" or "brownfield") to meet future housing and employment needs, the Council remains committed in principle to the development and regeneration of brownfield sites. The Council is proposing in the LPPO that contributions towards affordable housing is reduced to zero on brownfield sites in most of the urban area and only 10% in the outlying areas in order to encourage the use of brownfield land compared to greenfield land. However the evidence available now shows that this land alone cannot meet St.Helens future needs in full. Furthermore, a "brownfield first" approach may not ensure that a five year supply of land is maintained, or that housing needs are met in all settlements. Therefore an approach to release land from the Green Belt to meet these needs both during the plan period (2018-2033) and beyond is considered necessary. Draft Policies LPA02 in Preferred Options Local Plan sets out this approach and its justification in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

Housing Supply

With regards to a future supply of housing in St.Helens and in particular the supply of a mix of housing types, sizes and tenures to meet identified needs, Draft Policies LPA03, LPA05, LPC01 and LPC02 have been included in Preferred Options Local Plan which specifically

seek to address this matter. These policies set out the Council's expectations for, amongst other considerations, dwelling size, tenure type, density, provision of bungalows and provision of affordable housing. As this may vary over the life of the plan, a flexible approach to house types, sizes and tenures will be adopted, using the latest available information about needs in St. Helens and the locality of the development.

Protection of Cultural and Community Facilities

With regards to the protection of cultural and community facilities it is accepted and acknowledged that Local Plan will need to address this issues in order for the plan to be compliant with the NPPF. Draft Policy LPA08 has been included in Preferred Options Local Plan which specifically seeks to protect cultural and community facilities from loss where there is an identified need, building upon the approach in the Core Strategy.

Heritage and Archaeology

Concerning the issue raised around the archaeological importance of areas of the former Parkside Colliery Site, Draft Policy LPC11 in Preferred Options Local Plan specifically seeks to address the issues relating the development and the historic environment including the requirement for development proposals that may include heritage assets of archaeological interest undertake and submit an archaeological evaluation as part of any application. Any planning application made on this or any other allocation would need to comply with this Policy where relevant.

Approach to Planning for Future Employment Needs

With regards to comments relating to the Council's employment land evidence base on the need for employment land and a singular emphasis on logistics, in accordance with the requirements of the Planning Practice Guidance published by the Department for Communities and Local Government, the Employment Land Needs Study (ELNS) (2015) has assessed the quantitative demand for employment land in St Helens up to 2037. This included using economic forecasts to assess likely future growth in all industry sectors. The ELNS indicates that whilst traditionally St. Helens has been a manufacturing centre, with the largest consumers of land being B2 (general industrial) operations, it is likely that the mix of uses will change during the new Local Plan period (2018-2033), with a strong shift to B8 (storage and distribution) uses as St. Helens' location, astride the M6 and M62 motorways makes it particularly attractive for B8 development. Therefore the Local Plan Preferred Options allocates enough land to meet the future requirements for B8 uses, but also allocates land for B2 uses. In addition, there are vacant premises and land on the Borough's existing business and industrial areas (which are to be protected by the new Local Plan) which could accommodate various B1 and B2 uses. The comment about broadband is noted and in response, employment developments will be required to provide fibre optic cabling to the premises, alongside fibre optic to the cabinet for new housing development.

Parkside and relevant City Region and regional reports

Liverpool City Region reports relating to SuperPort and studies relating to the Northern Powerhouse and the latest Transport for the North studies (Transport for the North Freight

Strategy (2016)) have been considered in the Parkside Logistics and Rail Freight Interchange Study (August 2016).

Northern Powerhouse

With regards to the Northern Powerhouse and related transport interventions, Draft Policy LPA07 has been included in Preferred Options Local Plan which outlines the Council's commitment to work in partnership with statutory bodies including integrated transport authority for Liverpool City Region (Merseytravel), Transport for North, and the Department for Transport in the delivery of transport schemes during the plan period.

Liverpool City Region

With regards to future plans and strategies prepared for the Liverpool City Region, the St. Helens Local Plan will take full account of these. Details of the full scope of a sub-regional planning strategy continue to be refined but it is expected that there will be a high level strategic plan covering the city by 2020, the Local Plan will still need to be developed before then to set out how the strategic needs of St. Helens will be met, and to set out detailed local planning policies that will not be in the city region plan. The Local Plan will aim to reflect the emerging evidence informing the city region plan and vice versa, and the Local Plan will include a degree of flexibility to be compatible with the LCR plan.

Duty to Co-operate

Concerning engagement with neighbouring planning authorities on cross-boundary planning matters, the Council is committed to fulfil its 'Duty to Co-operate' with the relevant prescribed bodies and will actively engage these organisations throughout the local Plan Process; seeking agreement and solutions to strategic planning issues where necessary.

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	52
No	21
Not Specified	139

Summary of Comments

The following key issues were raised:

- Parkside Colliery site should not be used for a strategic rail interchange.
- Loss of Green Belt is unacceptable and 'Brownbelt' (brownfield) land should always be considered to be developed on first.
- Owing to tight Green Belt boundaries and previous policy regimes which have sought to concentrate growth in urban centres, almost exclusively at the expense of growth

outwith, many of these settlements have been unable to grow and prosper with services having been lost owing to the absence of any adequate critical mass of local population. Reversing this trend should be an important issue for the Local Plan.

- The spatial distribution of growth across the Borough, particularly in respect of housing and employment land should be addressed early in the Plan preparation.
- There should be a broader economic strategy that aims to maximise employment opportunities and economic growth.
- The need to maximise employment opportunities for the benefit of the local economy, taking advantage of growth sectors and the significant locational advantages of the Borough on the strategic road and rail network to strengthen and diversify the Borough Economy. There is a need to invest in skilled work which will further help the economy.
- The need to boost significantly the supply of new homes and supply the right type of homes required.
- Food security, flood defence and biodiversity should be key issues.
- Reference should be made to wildlife and enhancing biodiversity.
- There should be more focus on heritage.
- Impacts on health need to be addressed.
- There is insufficient infrastructure.
- Environmental impacts of Junction 22 to 23 on M6 will worsen.
- St.Helens' role within the Mid-Mersey sub-region, Liverpool City Region and wider region should not be downplayed and should be recognised.
- Cross Boundary issues and growth opportunities.

Council Response

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Question 3, please see the Council responses to Question 3 set out above.

Matters where a response has not been provided are set out below.

Parkside

In 2016 consultants AECOM and Cushman & Wakefield undertook the Parkside Logistics and Rail Freight Interchange Study. The Study identifies Parkside as a site of national importance as well as regional significance in relation to national and regional policy, the market demand and need for the delivery of new and improved Strategic Rail Freight Interchanges (SRFI). The Study found that there is a clear demand for a new SRFI in the North West, with Parkside regarded as the best placed site to satisfy this need. The Council considers that the Parkside site remains the single largest potential economic development site in the Borough, providing the greatest opportunity to meet the economic development aspirations of the Borough, being in a prime location for a SRFI. The site continues to offer unique opportunities to attract new inward investment and economic growth and continues to provide a substantial opportunity for the wider North West region through increasing freight capacity and capability in a growing economic sector.

Local Plan Preferred Options Policy LPA10 details the Council's proposed policy approach to the development of a SRFI at Parkside including what the Council will require in relation to the environmental impact of development proposals.

Spatial Distribution of Development

With regards to the proposed spatial distribution of the development, the Council acknowledges that this should be set out early on in the plan process. Therefore draft Policy LPA02 of the Preferred Options Local Plan sets out the Council's approach to the distribution of allocated sites to meet identified housing and employment needs. Draft Policies LPA04 and LPA05 specifically give details, including locations, of sites proposed for allocation to meet these needs.

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan?

Response	Number
Yes	59
No	10
Not Specified	143

Summary of Comments

- It is considered that the proposed Strategic Housing and Employment Land Market Assessment (SHELMA) should be included in the evidence base for the St Helens Local Plan. It is considered that this is particularly important to be referenced as St Helens is the lead authority for its production. If the St Helens Local Plan did not take into account the findings of the SHELMA this would call into question the whole purpose of the study and its relevance.
- Green Belt Review - the guiding principles of the Green Belt protection need to be accorded proper consideration as outlined in the national Planning Practice Guidance
- Updated SHLAA.
- The following documents are out of date: Landscape Character Assessment (2006), Phase 1 Habitat Survey (2001), St Helens & Earlestown Retail & Town Centre Uses Study (2011), Open Space Sports Study. Sports Facilities Strategy, Playing Pitch Strategy
- Traffic Studies on the effects of motorway congestion on regional economic growth.
- Traffic and Air Pollution/Air Quality Surveys
- Plans to use the Sutton Manor Colliery Site.
- Water Framework Directive with regards to water quality and the Council should refer to the North West River Basin Management Plan
- It is essential that the Local Plan recognises the potential economic growth opportunities offered by the initiatives and funding support being secured through the Combined Authority and Liverpool City Region.

Council Response

With regards to the comments received on the various evidence base documents needed in support of the Local Plan, the following explains the latest position broken down by theme:

Strategic Housing and Employment Land Market Assessment (SHELMA)

The Council acknowledges that the SHELMA will form a key piece of evidence concerning the strategic housing and employment needs for the Liverpool City Region.) Due to the timing of the study however, the Preferred Options Local Plan cannot yet have full regard to the implications of the SHELMA.

Green Belt Review

A Draft Green Belt Review has been prepared alongside the Local Plan Preferred Options in order to provide rationale for removing from the currently defined Green belt in order to meet identified housing and employment needs. The Draft Green Belt Review will also be available for comments as part of consultation.

Strategic Housing Land Availability Assessment (SHLAA)

The Council acknowledges the need for an updated SHLAA to inform the preparation of the new Local Plan and justify the approach to allocating land to meet future housing need. The SHLAA June 2016 (with a base date of April 2016) has since been prepared to ensure this aspect of evidence is as up to date.

Open Space, Sports and Recreation Assessment (OSSRA)

The Council acknowledges the need for updated evidence in relation to sports and recreations facilities and open space. A suite of documents collectively referred to as the 'OSSRA' has been prepared on behalf of the Council by consultants KKP. This includes: Indoor and Built Sports Facilities Needs Assessment June 2016 (with Golf Course Addendum); Open Space Assessment June 2016; Playing Pitch Strategy Assessment Report February 2016 and Playing Pitch Strategy & Action Plan July 2016. The OSSRA 2016 will directly inform the preparation of Local Plan policies concerning open space and sports facilities in the Local Plan.

Retail Needs Study

The Council acknowledges the need for updated evidence in relation to the future needs for main town centre uses including retail and leisure. A Retail and Leisure Needs Study is therefore being prepared by consultants WYG to update existing evidence. The study is expected to be finalised in early 2017 although emerging findings from the study have informed the retail and town centre uses related policies in the Preferred Options Local Plan.

Landscape Character Assessment

The Council considers that the Landscape Character Assessment 2006 remains capable at this stage of providing an essential overview of the landscape character of the Borough and provides borough-wide guidance on landscape and visual sensitivity, woodland planting and landscape strategies.

Phase 1 Habitat Surveys

Whilst the initial surveys date from 2001, this still provides a good overview for the natural habitat of the Borough, and is supplemented by more up to date site specific information where this is available.

Air Quality and Traffic Studies

The Council is committed to addressing the issue of air quality in the Borough. Draft Policy LPD09 seeks to ensure that Development proposals must demonstrate that they will not hinder the achievement of Air Quality Management Area (AQMA) objectives and the measures set out in an Air Quality Management Area Action Plan.

Policies in the Local Plan will seek to minimise the negative impacts of transport including air and noise pollution through requiring developers to implement Travel Plans in accordance with the requirements of the Ensuring a Choice of Travel SPD.

With regards to traffic surveys, where necessary the Council will require specific traffic surveys to be undertaken by applicants in order to demonstrate that impacts on the road network will not be unacceptable.

Water Framework Directive and Water Quality

The Council fully recognises the requirement to protect the water environment under the Water Framework Directive, which not only serves as a source of water but provides essential habitats and a valued resource for leisure and recreation.

Draft Policy LPC12 of the Preferred Options Local Plan will set out the Council's approach to ensuring water quality. St. Helens Council is working in partnership with the Environment Agency, Healthy Rivers Trust, Halton and Warrington Councils as part of a catchment based approach, to produce a Sankey Catchment Action Plan which has the aims of reducing the reactive nature of the catchment by "Slowing the Flow" in the rural headwaters and filtering agricultural run-off, improving water quality and wildlife habitat; addressing issues in the urban areas of the catchment such as wrong connections and removing pinch-points that can contribute to poor water quality and localised flooding.

Former Sutton Manor Colliery Site

The Council's approach to future development of the former Sutton Manor colliery is set out in The Bold Forest Park Area Action Plan (AAP) which is currently under examination in the with adoption expected in early 2017. The AAP has identified the Sutton Manor site as a key 'recreation hub' offering visitor facilities serving both the Sutton Manor site the wider forest park area.

Liverpool City Region

Any evidence prepared on a Liverpool City Region wide basis (including the SHELMA as detailed above) will be considered in preparation of the Local Plans as and when it becomes available. The Council continues to pursue opportunities for funding associated with LCR initiatives where appropriate.

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	39
No	19
Not Specified	154

Summary of Comments

A wide range of comments were received in response to this question suggesting differing views on what the vision of the future of the borough should be. A summary of these viewpoints is provided below:

- Be realistic but more aspirational.
- Acknowledge the drive for housing and employment growth.
- We need employment but not at the expense of well-being and health.
- Include something about enhancing the environment & biodiversity.
- Needs to be more focus on preservation of architectural heritage
- Desire to develop Green Belt land without reference to the need to engage with brownfield opportunities before such action present a turnaround from previous approaches
- Place a higher priority on the use of brownfield sites before raiding the valuable Greenbelt land.
- Should also detail a more comprehensive approach to addressing the full, objectively assessed housing needs across the Borough.
- Land that is suitable for release from the Green Belt should be released wherever it is sustainably located.
- Include reference to St Helens creating opportunities for residents to be active in their work and play.
- Engagement on how to develop our neglected town centre
- Green Infrastructure planning corridors.
- Should support the delivery of housing in sustainable locations throughout the borough and to those market areas where deliverability is better assured.
- The Vision should refer to longer-term aspirational projects or sites, rather than developments that have already taken place (e.g. the new Rugby League stadium and St.Helens College).
- Should be updated to reflect more recent evidence particularly in relation to future economic growth objectives linked to the wider Liverpool City Region
- Should recognise the location of St. Helens between Liverpool and Manchester as a major advantage to achieving a regenerated Borough with a vibrant economy. The opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City

Region and North West in general (such as the Superport, Airport City, and major upgrades to the M6 and M60 to make them Smart Motorways)

- Should be better option for Parkside than an SRFI or HGV distribution centre as you might expect. There is too much focus on logistics.
- Should reference the employment opportunity at the Parkside site rather than being specific about it being an SRFI.

Council Response

The Council has acknowledged the various comments received on the vision which will need to set out the Council's aspirations for the Borough's future development over the next 15 years and beyond and lead to the identification of objectives on how this will be achieved. Having considered the latest available evidence, taken account of the range of viewpoints on how the Borough should develop and look, and then consider what can realistically be achieved within the framework of national planning policy; a refined vision has been presented in the Preferred Options Local Plan. This vision seeks strike the balance between aspiration and achievability to encompass the key themes of urban regeneration, environmental sustainability, provision of housing and jobs, town centre vibrancy, transport and culture.

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

Response	Number
Yes	39
No	15
Not Specified	158

Summary of Comments

A wide range of comments were received in response to this question suggesting differing views on what the aims and objectives of the Plan. A summary of these viewpoints is provided below:

- Be to attract industries including manufacturing that give the possibility of a sustainable future environmentally and providing work opportunities.
- The strategy of building an entire economy for the borough on a tiny number of logistics sites at the edge of the borough should be revised creating a wider economic plan for the borough as a whole with a diverse range of industries.
- The local infrastructure is clearly in need to vast improvement and investment before any plans for 2033 to be considered

- There should be greater emphasis on delivering economic growth and meeting housing needs as reflected in the NPPF.
- Health, leisure and transport infrastructure need to be aligned with development, this is lacking in both plans.
- Require some amendments to make them aspirational - the Council needs to be satisfied that sufficient brownfield sites remain that are available and deliverable. In order to be truly aspirational the plan needs to achieve the boost in housing supply as required by the NPPF. In order to achieve this, the Council needs to identify a range of suitable sites across a much wider housing market.
- It is considered however that the aspirations set out by the council do not accord with the core principles of NPPF, which whilst encouraging the redevelopment of brownfield sites, instead seeks to significantly boost the supply of homes. To achieve this, it is likely that the council will require greenfield sites.
- The NPPF no longer places a priority of PDL over greenfield land. The revised aims should also recognise the intrinsic link between economic growth and housing development, to ensure sufficient new employment land is identified to meet the needs to new and existing businesses which are closely aligned with new housing development to ensure that adequate provision is made for economically active households to locate close to economic development, helping to create more sustainable communities throughout the Borough.
- The objectives should be updated in the Local Plan to acknowledge that whilst priority will be given to derelict and vacant sites, such sites are not available in the quantity needed to provide for the employment and housing needs of the Borough. Furthermore, development on such sites is often constrained by viability issues which prevent development.
- The objectives in the Local Plan should be similar to that in the Core Strategy but should also refer to St.Helens key location between Liverpool and the National Infrastructure network in relation to economic growth.
- Objectives should reflect the economic opportunities presented by the Borough's location and should refer to the latest evidence base documents that demonstrate the need for economic development, and include more positive language aimed at boosting the economy.
- Objectives should be to attract industries including manufacturing that give the possibility of a sustainable future environmentally and providing work opportunities.
- Objectives should be more aspirational in order to accommodate an increase in economic activity, attract new jobs and investment and reduce levels of unemployment.
- The Housing Aim should be given more consideration within the Local Plan to reflect the growing importance government is placing upon housing as an issue that the planning system must tackle on both the national and local scale.
- Should make it clear that new housing should be provided throughout the borough and include land removed from the Green Belt as this is the only way which the council can deliver the necessary housing.

Council Response

The Council acknowledges the various comments received on the aims and objectives of the Plan which will need to set out how the vision can be achieved.

Having considered the latest available evidence, taken account of the range of viewpoints on how what the Plan's objectives should be, and then consider the requirements of the National Planning Policy Framework; the Council considers that the strategic aims and objectives set out in the Local Plan Scoping Document provides an appropriate framework to deliver sustainable development in St. Helens. However in light of the comments received there was a change made to the title of Strategic Aim 1 and Strategic Objective 5.4 was added.

The Council consider that whilst all the key themes should be covered, the aims and objectives should set the 'headline' priorities with the details of how these will be achieved laid out in the relevant policies.

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say?

Response	Number
Yes	42
No	18
Not Specified	152

Summary of Comments

A summary of the comments made in relation to what policies should and should not be included in the new Local Plan are provided below:

- Not to develop the former Parkside Colliery as a strategic rail interchange.
- Not to develop land by Junction 23 of the M6, Haydock Island.
- The policy of developing logistics as the core future industry for the St Helens borough should be abandoned in favour of a more diverse economy.
- Housing and Employment Requirement should be separate policies.
- Housing, Employment and Mixed Use Allocations - full site details should be provided including site boundaries on a plan base.
- Strategic Sites: it should be clarified how such sites would fit with the overall housing or employment requirement figures.
- Policy should retain the Green Belt
- The least sensitive Green Belt sites should be removed from the Green Belt in the first instance as part of the Green Belt review.
- Should be appropriate to include a strategic policy on 'the extent of the Green Belt' in order to make minor or major changes to the green belt where necessary.

- Safeguarded Land: the provision of a 5 year safeguarded land supply for both employment and housing development is considered insufficient as it does not meet NPPF requirements for Green Belt boundary change to endure beyond the Plan period.
- Policy upon 'Affordable and specialist housing needs' this will also need to consider starter homes. Specialist housing should be provided including extra care villages, retirement housing and care homes.
- The absence of a policy relating to existing Retail Parks
- Councils have a statutory duty to ensure development does not jeopardise the attainment of "good" status under the Water Framework Directive and as set out in the River Basin Management Plan.
- Should be a Development Management Policy worded along the following lines: "The Council's Biodiversity and Ecological Network resources will be protected, conserved and enhanced".
- Local standards for playing pitches and other outdoor sport provision is no longer appropriate because the standards have historically resulted in single pitch sites that are not sustainable and quickly fall out of use. These types of provision do not meet demand.
- Health and Leisure should be included.
- Should include policy stating: The Council will resist the loss or change of use of existing community and cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.
- Linkway Distribution Park is not suitable or viable for continued employment use/economic development and should be allocated for residential development.
- The need to preserve important heritage sites in the borough and In Rainhill especially (specifically Rainhill Trials of 1829).
- Respect Parkside's historical significance and archaeological heritage.

Council Response

The Council acknowledges the comments received on a range of matters and recognises that there is a need to address these in policy with regard to the evidence available and National Planning Policy Framework.

Former Parkside Colliery

The Council's response concerning the justification behind its preferred approach to the future development of the former Parkside Colliery has been set out in response to Question 4 above.

Emphasis on Logistics and Land at M6 Junction 23

The justification for allocating land for B8 employment uses (logistics and distribution) in the Local Plan Preferred Options is summarised in response to Question 3 above.

A number of sites close to M6 Junction 23 have been identified as Preferred Options for allocation for B8 and B2 employment uses. The selection of the proposed allocations are in response to the findings of the Draft Green Belt Review and also the findings of the Allocations Local Plan Economic Evidence Base Paper (2015) and the Employment Land Need Study (2015), which both found that St. Helens' location on the M6 motorway means that it is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector.

Green Belt and Green Belt Review

The Council's proposed policy position concerning the need to release land out of the existing Green Belt in order to meet projected housing needs over then Plan period is set out in Draft Policy LPA02 in Preferred Options Local Plan. The justification of this policy seeks to explain the rationale behind this approach. The Council recognises the importance of a comprehensive documented review of the Green Belt in support this approach and has prepared a Draft Green Belt Review which will be subject to full consultation.

Safeguarded Land

The response to Question 3 sets explains the Council's position on safeguarding land to meet future needs beyond the Plan Period. Draft Policy LPA06 of the Preferred Options Local plan outlines the Council's proposed approach to Green Belt Land and Safeguarded sites.

Housing and Employment Allocations

The Council's proposed policy approach to the identification of future employment and housing allocations is set out in draft Policies LPA04 and LPA05. These sites are identified on the Draft Policies Map with individual site boundaries shown in the appendices of the Preferred Options Local Plan. Draft policies LPA04.1, and LPA05.1 set out the initial 'high level' site specific requirements of those employment and housing considered to be strategic in nature.

Specialist Housing Needs

The Council fully recognises the need for the right mix of housing types to meet the range of housing need. Draft Policy LPC01 sets out the Council's approach to providing this mix including, amongst other measures, provision for bungalows, specialist and supported housing for elderly and vulnerable people and self and custom build schemes. This policy is informed by the Mid Mersey Strategic Housing Market Assessment (SHMA) 2016 which provides the justification for this approach.

Retail Parks

In relation retail parks, the Council recognises the role and function of the Ravenhead and St.Helens Retail Parks which have been identified within the St.Helens 'Central Spatial Area'. Draft Policy LPB01 of the Preferred Options Local Plan sets out the council's approach to planning for retail with this are with a focus on the continuation of a 'town centre first' approach in line with national policy in order to enhance the vitality and viability of the town centre. The policy will seek to facilitate linked trips between the Primary Shopping Area

and other existing and developments within the St. Helens Central Spatial Area, including the Ravenhead and St. Helens Retail Parks.

Water Framework

The Council's proposed policy approach to the meeting requirement has been summarised in response to Question 5 above.

Playing Pitches

The Council's approach to planning for playing pitches is set out Draft Policy LPC05. This supports the delivery of programmes and strategies to provide and enhance open space and sports and recreation provision. The application of this policy will have regard to the Council's latest Playing Pitch Strategy (PPS) as referred to in response to Question 5. The latest PPS was prepared in line with Sport England's methodology and approved for adoption by the Council in August 2016. This policy is approach considered in line with national planning policy and the current guidance and policy adopted by Sport England.

Health and Leisure

The Council will seek to promote health and leisure through the Local Plan. This is a cross cutting theme, and has been addressed by Draft Policies LPA01, LPA03, LPA08, LPC05, LPC07 and LPD11 of the Preferred options Local Plan.

Loss of Community Facilities

The Council's proposed policy approach to the meeting requirement has been summarised in response to Question 3 above.

Linkway Distribution Park

The site of the Linkway Distribution Park has not been proposed as a housing allocation in the Preferred Options Local Plan. The site was identified in the SHLAA 2016 (site 38) which assessed the site as not being suitable for housing.

Heritage and Archaeology

The Council recognises the importance of significance of heritage and archaeology in the planning process. Draft Policy LPC11 in Preferred Options Local Plan specifically seeks to address the issues relating the development and the historic environment. The Council's proposed policy approach addressing heritage matters is summarised in the response to Question 3 above.

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this?

Response	Number
Yes	68
No	8
Not Specified	136

Summary of Comments

A summary of the comments made in relation to which sites should require specific policies are provided below:

- Parkside is the last remaining potential for a buffer zone between the urban sprawl of St. Helens and Warrington. With the move towards the promotion of out of town retail developments encroaching more and more into this dividing space, we are in danger of reaching the point before too long at which neighbouring towns will blend seamlessly into one another and lose any sense of individuality.
- The Parkside site needs long term consideration as to how this will affect the area beyond recognition. Development of the brownfield section would not seriously affect the area to the same degree. Removing the Greenbelt status therefore seems a step too far.
- Protection of heritage. The former Parkside Colliery site needs to be protected as the location of the 1648 battle of Winwick as is the only major action from the second Civil War that has survived intact and offers the potential to learn much more about the battle. This aspect of heritage conservation needs to be included in future plans. Protection of the Huskisson memorial, Protection of the wild life and fauna in and around Parkside.
- The Parkside Site is a key area for biodiversity being in one of the remaining semi-rural locations in the area and serves as a critical wildlife corridor being linked to Winwick Countryside, Lowton, Kenyon and Highfield Moss SSSI.
- The original footprint of the Parkside Colliery site (brownfield) should be given over to housing. The remaining area left as public wildlife park, but with the addition of a lake for waterfowl.
- Parkside should be the subject of a new Local Plan site specific policy which removes it from the Green Belt and allocates it for employment purposes.
- Since the preparation and adoption of the Core Strategy, there have been significant changes in circumstances with regards to Parkside that warrant such a changed approach including: baseline objectively assessed employment need is new and significant, changed strategic (and local) economic context (Northern Powerhouse/ Liverpool City Region)
- Junction 23 and Parkside - the traffic cannot cope at present not just the motorway but local roads particularly going into Warrington.
- The Vulcan Site redevelopment of houses is incomplete and the roads are inadequate, schools and medical centres will struggle with new families. The massive

redevelopment of the Burtonwood airbase has given massive capacity for warehouses and freight and so we need to give up green belt site for more freight.

- The Florida Farm North site no longer fulfils the purposes of including the land within the Green Belt and should be removed and allocated for B2/B8 employment development.
- The Overall Spatial Strategy should identify the St. Helens Core Settlement as a priority area for residential development but should also set out a hierarchy of settlements such as Newton-le-Willows, in and around which employment land should be allocated in order for sustainable growth to be achieved across the Borough.
- Policies setting out both employment and housing allocations should be included in the Local Plan. The locations of such sites should be fully informed by the consideration that a sufficient supply of homes within easy access of employment represents a central facet of any efficiently functioning economy. It is therefore important to include a clear Overall Spatial Strategy policy in the Local Plan which sets out where employment and residential sites will be located, reflected by a Key Diagram.
- The Borough's employment needs and requirements and the consequential site allocations to meet the need should be broken down into the component business classes, e.g., B1/B2/B8 and large scale logistics to reflect the growth potential and the specific needs of the different forms of employment development.
- The Housing and Planning Bill is expected to receive Royal Assent in 2016 and will include powers to grant automatic planning permission in principle to land allocated in Local Plans. Land would be awarded "permission in principle" subject to criteria set out in a development order and subject to subsequent grant of consent to "technical details" and would likely remove need to pursue outline planning permission. These powers may be in force prior to the adoption of the emerging Local Plan and it will be necessary to have regard to this and consider policies about specific sites. This is likely to include details regarding the extent of the site and type/scale of development which is permitted and requirement (or not) for Environmental Impact Assessment. Implications for "permission in principle" should be carefully monitored by the Council in progressing the Local Plan.
- Overly prescriptive and onerous site-specific policies should be avoided unless such sites are strategic in scale. It is considered that in the main, such matters can be dealt with through the development management process.
- Re-use Brownfield sites in Town Centres.
- High quality agricultural land (vital at a time of a growing national and world population), woodland and public open spaces should be protected from development.
- Need for specialist housing including extra care villages, retirement housing and care homes.
- The need to preserve important heritage sites in the borough and In Rainhill especially e.g. Need to make more of the Rainhill Trials of 1829.
- St. Helens should give recognition to its existing Retail Parks that complement the town centre's role and acknowledge that they are established retail destinations in

their own right, employing hundreds of workers and contributing significantly to the local economy.

- Sites that are allocated for the accommodation of Gypsies and Travellers in close proximity of the strategic highway networks would benefit from specific policies to guide development in order to minimise the potential impacts of proposals on neighbouring authorities.

The Council acknowledges the comments received on site specific sites policies. A summary of the how the Council proposes to approach these site specific considerations is provided below.

Former Parkside Colliery Site

Concerning the former Parkside Colliery site, the justification for the proposed use of this site has been summarised in response to Question 4. With regards to site specific issues, the Council had identified site specific requirements for Parkside East and West in Draft Policies LPA04.1 (under EA9) and LPA10 of the Preferred Options Local Plan. A key requirement of the delivery of this site is the need to address the impacts of the proposals on the existing infrastructure (as detailed in the Draft Policies). In addition to these requirements, proposals on the site will be required comply with all relevant development plan policies addressing a wide range of environmental matters including, but not limited to: air quality, heritage and archaeology, landscape protection ecology, biodiversity trees and woodland.

Former Vulcan Works and Infrastructure

The Council acknowledges that there are existing infrastructure issues and that proposals brought forward through the Local Plan on allocated sites will have potential impacts on this. As stated in Draft Policy LPA08, following the consultation on the Preferred Options, the Council will prepare an Infrastructure Delivery Plan. This will specifically identify where additional infrastructure or service capacity is needed order for new development to be acceptable.

Florida Farm

The Florida Farm North site (site ref EA2) has been identified in the Preferred Options as appropriate for B2 and B8 Uses.

Spatial Strategy

The Council's proposed strategic approach to the distribution of development over the Borough has been summarised in the response to Question 4 above.

Employment Needs

The Council's proposed approach to planning for employment needs has been summarised in the response to Question 4 above.

Level of Site Specific Details

The Council has identified site specific requirements for strategic housing and employment sites as detailed in Draft Policies LPA04.1 and LPA05.1. For all identified allocated sites, proposals on the site will be required comply with all relevant development plan policies. Specific requirements for sites will be further developed in the next stage of Plan (Publication Version) along with an Infrastructure Delivery Plan. The Council is keeping the issue of Permission in Principle (PiP) under review as there is currently a lack of detail from the Government on how this will operate and what level of detail will be required in plans. Until this detail emerges, the plan is not granting PiP to allocated sites.

Use of Brownfield Sites

The Council's approach to bringing forward the development of 'brownfield' sites has been summarised in response to Question 3.

Protection of Woodland and Open Space and Agricultural Land

The Council's approach to ensuring that open space and woodland is protected is set out in Draft Policy LPA09. Under paragraph 112 of the NPPF, Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.

Provision of Specialist Housing

The Council's proposed policy approach to provision of specialist housing has been summarised in response to Question 8 above.

Retail Parks

The Council's proposed policy approach to the consideration of the existing retail parks has been summarised in response to Question 8 above.

Gypsies and Travellers

The Council's proposed policy approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople has been set out in Draft Policy LPC03. The Draft Policy identifies and details locations of a permanent and transit site (site refs GTA01 and GTA02) to meet identified needs.

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens?

Response	Number
Yes	16
No	36
Not Specified	160

Summary of Comments

A summary of the comments made in relation to housing growth and objectively assessed need are provided below:

- St. Helens needs more new housing.
- The North West has a housing crisis.
- Use of Green Belt should be kept to a bare minimum and brownfield sites should be used and should always be the first option.
- Effects of climate change and impact on air quality need to be taken into account.
- Empty homes should be brought back into use.
- The capacity of existing infrastructure and the need for new health, education and transport infrastructure needs to be considered.
- Development should be spread fairly across the Borough.
- 451 dwellings per annum is based on a 'policy off' figure. This should be a minimum annual requirement.
- The overall methodology within the 2016 SHMA appears to be broadly appropriate.
- It is important that the overall housing requirement for St Helens is set in the context of the neighbouring authority areas.
- The OAN has underestimated needs in St Helens. There are a number of issues within the SHMA which render it unsound and inconsistent with national guidance. It is imperative that the resulting housing target is reviewed upwards by a significant amount as the new Local Plan emerges.
- The OAN for employment land should be aligned with the OAN for housing in the Borough.
- Historic rates of delivery suggest that higher rates of development can and have consistently been achieved in St. Helens. The suggested need for 451dpa would therefore not appear to provide the significant boost to supply required by the NPPF nor the aspiration set by the Northern Powerhouse agenda.
- St Helens should plan for a higher level of housing growth than 451 dwellings per year.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

Housing Requirement

The Council recognises that the Borough needs more housing to meet future housing need. At 570 dwellings per annum the housing requirement in the Local Plan Preferred Options is set at a level above the objectively assessed housing need (OAN). The Local Plan Preferred Options housing requirement of 570 dwellings per annum is the same as the annual average net housing target of 570 set in the St. Helens Local Plan Core Strategy (2012). The Core Strategy target was set by the Regional Spatial Strategy for the North West and was a target for growth that was above housing need estimates. A growth approach in Local Plan is still considered appropriate to help meet St. Helens development

needs and economic growth plans and it is considered realistic as this target has been met in years including 2013/14 and 2015/16.

Aligning the housing and economic growth strategies

The recommended OAN of 451 new homes per year up to 2037 identified in the Mid-Mersey Strategic Housing Market Assessment (SHMA, January 2016) factors in forecasted economic growth for St. Helens (Cambridge Econometrics Baseline Forecast June 2015). The Local Plan Preferred Options housing requirement of 570 dwellings per annum up to 2033 is set at a level above baseline economic growth needs in order to help meet the Borough's economic growth plans.

Environmental Impacts

Potential effects of the Local Plan on all social, economic and environmental issues including climate change and air quality have been considered in the Sustainability Appraisal for the Local Plan Preferred Options and would be considered further at the planning application stage if development proposals come forward.

Brownfield Land

Brownfield land will play a major role in meeting housing need over the plan period (59% of all housing need identified for the period 2018 to 2033 in the Local Plan Preferred Options is to be delivered on brownfield land), but the 2016 Strategic Housing Land Availability Assessments (SHLAA) has found that there is inadequate available brownfield and greenfield land (not previously developed land) in the urban areas to meet housing needs. Therefore the release of Green Belt will be required to meet future housing need in the Borough.

Empty Properties

The Council do actively try to bring empty homes back into use. The Council's latest strategy is set out in the St Helens Empty Homes Strategy 2013-2015.

Infrastructure

Working with partners and infrastructure providers, the Council will ensure that sufficient physical, social and community infrastructure is provided to support the development identified in the Local Plan through the use of integrated demand and asset management or new infrastructure provision. This will set out in an Infrastructure Delivery Plan which will be prepared for the Publication Draft Local Plan.

Proportionate Development

As explained in Local Plan Preferred Options Policy LPA02, the Local Plan aims to ensure there is additional new housing provided in every Key Settlement to ensure all communities have access to new market and affordable housing. Appendix 10 of the Local Plan Preferred Options sets out the distribution per ward.

Neighbouring Authorities and Duty to Co-operate

Concerning engagement with neighbouring planning authorities on cross-boundary planning matters, the Council is committed to fulfil its 'Duty to Co-operate' with the relevant prescribed bodies and will actively engage these organisations throughout the Local Plan Process; seeking agreement and solutions to strategic planning issues where necessary.

A Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) is currently being undertaken which will identify housing and employment land objectively assessed needs for each Liverpool City Region. Due to the timing of the Study, the Preferred Options Local Plan could not have full regard to the implications of the SHELMA.

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target?

Response	Number
Yes	25
No	30
Not Specified	157

Summary of Comments

A summary of the comments made in relation the objectively assessed need and housing target are provided below:

- The findings of the Liverpool City Region SHELMA should be taken into account when determining the housing target including the need to accommodate additional unmet or overspill need from other authorities.
- An arbitrary target will lead to poor outcomes for the future of the borough.
- Impact on current environmental matters should be considered.
- Economic growth aspirations of St Helens should be factored into the assessment and that the housing and economic strategies align with one another.
- The current evidence base fails to adequately align housing need with the stated economic ambitions of the authority.
- A level of housing need some 100 to 120 dwellings per annum higher than the housing OAN is needed.
- Ensure housing is built on Brownfield Land
- Road Infrastructure should be adequate before housing is built
- A housing target higher than the OAN should be set in the SHLP to provide enough flexibility and choice to help ensure that enough housing is delivered over the plan period.
- Any shift from objectively assessed needs to a housing target must ensure that the target is not lower than the identified need. If the target is lower than the objectively assessed need the identified housing needs for the borough may not be met and sufficient supply may not be identified.

Council Response

The responses above have been used to inform the Local Plan Preferred Options. All of the issues raised by consultees in response to this question were very similar to those raised in response to Question 10, please see the Council responses to Question 10 set out above.

Q12. What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens

Response	Number
Yes	12
No	102
Not Specified	98

Summary of Comments

A summary of the comments made in relation economic growth and objectively assessed need are provided below:

- Negative impact through air pollution.
- This is entirely inappropriate and is only based on a single dimensional strategy for logistics to dominate the St Helens economy based on isolated reports this is driving the plan to release huge areas of green belt from the area likely in a single location which in itself has major traffic infrastructure problems.
- The local area does not have the infrastructure for a development of this size. The roads are already far too congested and pollution is far too high.
- What is important to recognise is the need to stimulate economic growth and promote new job creation. These outcomes should not be constrained by a failure to plan for sufficient employment space.
- From the evidence available it is apparent that St Helens does not have sufficient land available to meet its housing and employment requirements. As a result, Green belt release in sustainable locations should be considered for release.
- The objectively assessed need of 178.5ha employment land up to 2033 is considered to be constrained and not fully representative of St. Helens economic growth potential. A range of 217-244 ha is a more appropriate figure and reflective of St. Helens playing a more significant role in meeting demand emanating from both SuperPort and enhanced demand for general large scale logistic operations.
- The estimated figure of 178.5 Ha of employment land to 2033 is too low and lacks ambition. St Helens should consider attracting 25-30% of the 340 Ha SuperPort
- The figure of 178.5ha to 2033 seems appropriate, being derived from an up to date (2015) study, and taking into account the increased demand for logistics uses because for the new Liverpool 2 Terminal at the Port of Liverpool.
- The employment land OAN should be used as a starting point, with the employment land requirement in the SHLP set at a higher level than the OAN to build in flexibility and help ensure that the necessary level of development is delivered over the plan period.
- In 2012, the need was stated in the Local Plan as 37ha. The only reason for such a huge increase in such a short space of time is to take a massive, pre-determined area of land out of the Green Belt in order to satisfy St Helens Council's desire to develop the area around the former Parkside Colliery at any cost.

- Documentation refers several times to the M62 junction 7 and A570 Road as a Logistics centre. This area being also next to the Liverpool to Manchester Railway line is ideal for Employment Land Needs.
- The former Parkside colliery site has ancient history that has not been recognised in the adopted Local Plan 2012. This needs to be corrected.
- Economic growth is always needed but must take into account the impact on the environment e.g. green belt, wildlife and air pollution.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Questions 3, 4, 10 and 11, please see the Council responses to those questions set out above.

Matters where a response has not previously been provided are set out below.

Employment Land Requirement

Taking the Council's economic growth ambitions, emerging evidence about potential land requirements arising from SuperPort, economic changes and economic development initiatives such as Parkside, and the comments received from consultees during the Local Plan Scoping Consultation (2016) into consideration, it is considered that the employment land requirement for the Plan (306ha) has been set at a level that allows for enough flexibility to respond to any requirement to meet B8 strategic land needs resulting from the SHELMA over and above that identified in the ELNS (clearly this position will need to be reviewed following the publication of the SHELMA), and the comments received in relation to the positive role St. Helens can play in meeting the needs of the general logistics and distribution sector.

Q13. Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement

Response	Number
Yes	16
No	39
Not Specified	157

Summary of Comments

A summary of the comments made in relation the objectively assessed need and employment land requirement are provided below:

- We support in its entirety the development on and around Parkside and so have no issues or objection to any of the land proposed to be released. Any traffic impact of the workforce should be considered when releasing land for development, especially residential development in the town.
- No this is against the National Policy Planning Framework and Green Belt Legislation.
- It is considered that as the impact of the Super Port expansion will be felt across the sub region, the most logical scale at which the need can be analysed and quantified is at the sub regional level.
- Too much emphasis on using Green Belt for Employment.
- It will lead to very poor outcomes for the borough environmentally and economically because it would be developer driven, and not based on the rest of the borough, aligned with wider social and environmental objectives.
- Encouragement of giant warehouses will not add much employment as local area consolidation will occur and the new buildings will be automated.
- Brownfield land should be used first.
- The process appears to be robust and appropriate. One other factor that should be taken into account is the Duty to Cooperate and any issues resulting from that.
- The 178.5 ha figure should be the very minimum target to provide for sufficient flexibility in the supply of land.
- Whilst reference is made within the ELNS, specific reference should be made within the Plan itself to the Liverpool City Region, the associated LEP and the various economic growth strategies and objectives that encompass St Helens with the wider FEMA of the Liverpool City Region.
- There is currently no provision of suitable land for distribution uses within the Borough. Given the need for large scale employment sites, and the relatively high land demands of such sites, St. Helens should pursue a significantly higher figure than the OAN when setting the employment land requirement in the emerging SHLP.
- Traffic, pollution and conservation need to be considered.
- Support the Council's approach subject to a more ambitious and aspirational approach being taken to economic growth.
- We recognise that the objectively assessed need claimed by the Council is 'policy off' and that the employment land requirement will need to take into account wider factors, such as the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints and the Council's economic growth aspirations.
- No-if the large Omega development along the M62 is anything to go by how many actual new employment's been generated?
- Local health and environmental issues.

Council Response

The responses above have been used to inform the Local Plan Preferred Options.

As many of the issues raised by consultees in response to this question were very similar to those raised in response to Questions 3, 4, 10, 11 and 12, please see the Council responses to those questions set out above.

Matters where a response has not previously been provided are set out below.

The need to release Green Belt land for employment use

Since the adoption of the Core Strategy (2012) there has been a slow take-up of employment land within St. Helens with only 2.37ha developed from 2012 to 2016, with take-up being significantly below the long term average annual take-up of 5.79 hectares per year (1997-2012). Employment sites have faced increased pressure from higher value uses such as residential and retail and consequently the Borough has experienced a net loss of 34.93ha of employment land since 2012.

The AECOM Local Plan Economic Evidence Base Paper (2015) concludes that large scale logistics is the most active market in the region and a particular opportunity for St. Helens. However, none of the sites identified in the evidence base that supported the Core Strategy as suitable for large scale distribution and manufacturing uses, satisfy the criteria now suggested as being preferred by the market for large scale uses. Consequently, there is currently zero provision of suitable land for large scale distribution uses within the Borough's identified employment land supply. This shortage of available land to build large distribution facilities has meant that in recent years, when demand for such premises has been high, occupiers have had to locate elsewhere

To meet market needs for the large scale distribution sector (300,000 square feet) requires the delivery of sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in the Local Plan Preferred Options. However it is important to note that smaller existing urban employment areas will still have an important role to play in accommodating smaller scale employment development during the Plan period and as such the Local Plan Preferred Options seeks to protect the Borough's existing business and industrial areas.

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?

Response	Number
Yes	24
No	118
Not Specified	70

Summary of Comments

From those consultees who responded yes, the following points were made:

- The amount of deliverable brownfield housing land in the Borough is likely to be lower than originally envisaged; it is clear that the Council cannot ensure that the Green Belt boundaries will endure beyond the plan period, and therefore a review of

the Green Belt is required to identify the necessary deliverable sites that can beat ensure development to meet housing and employment needs.

- There are several precedents for Green Belt land release across the Liverpool City Region. It will be difficult to accommodate the level of housing and employment land required within St Helens without Green Belt land release. Knowsley Council does not currently have any ability to accommodate housing or employment development needs arising in St Helens.
- The adopted Core Strategy already acknowledges Green Belt release will be necessary to meet future housing needs post 2022, so exceptional circumstances required by the NPPF have already been established.
- The need for Green Belt release for employment land has been firmly established and there is no realistic alternative to provide the amount of land needed for the development of housing and employment uses.
- The Council acknowledged that other authorities in the same housing market area have 'no spare suitable brownfield land to meet St Helens needs'. St Helens therefore must meet its own housing needs, and it has been demonstrated that Green Belt release is the only option to achieve this.
- The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard and taking account of paragraph 7.17 of the consultation document which identifies; 'Green Belt release is now needed to meet both housing and employment needs' it is agreed that Green Belt release should be considered through the plan.
- Settlement boundaries will need to be reviewed and relaxed to genuinely ensure opportunities are afforded for a range of site types and sizes, including small sites, to be brought forward.
- There must be a Green Belt review and welcome the proposed Review that will be undertaken as part of the Preferred Options Local Plan. The Green Belt has not been substantially altered since 1983 and this plan review is the ideal opportunity to undertake that strategic revision as the other neighbouring authorities have done or intend to do.
- If Green Belt release is required this should be based on a robust evidence base. Green Belt serves five purposes (NPPF Section 9 pg 19):
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration.
- If the shortfall of land for housing is not met the spatial vision for St Helens will be undermined, with housing developments coming forward on previously undeveloped green field sites in unsustainable locations, or locations which do not maximise regeneration objectives.
- Releasing previously developed land from the Green Belt, such as this site will help to remove uncertainty for landowners and developers. In doing so, there is greater

prospect of encouraging housebuilders and developers to bring sites forward to meet housing and employment needs.

- There are few natural wild habitats around Newton le Willows /Lowton / Winwick and removal of greenbelt would be catastrophic for the well-being of both flora and fauna and that of thousands of local residents. Far more people would be adversely impacted than would benefit from the permanent loss of greenbelt.
- It is clear that there is a significant housing and employment land requirement in the borough that cannot be met by the redevelopment of the available brownfield land. On the basis that 65% of the borough is within the Green Belt it would be entirely appropriate to remove the less sensitive and more sustainable sites from the Green Belt and allow for them to be developed.
- It is important in planning for the provision of new open market and affordable homes, that sufficient consideration is given to planning provision in areas where people wish to live and which are generally sustainable. It is also important to ensure that reliance on the use of previously developed land to deliver the annual housing requirement does not constrain deliverability of housing.

From those consultees who responded no, the following points were made:

- Any Green Belt loss should be incremental, from the existing urban area outwards, so that productive land not to be built on in the short term is not sterilised from an agricultural perspective.
- If any land is removed from the Green Belt and allocated for development, then equivalent brownfield/greenfield land should be turned into wildlife meadows, allotments and so on to compensate for any Green Belt loss i.e. to improve the quality of life of people in the surrounding area.
- All current designated open spaces, including that in densely populated residential areas should be protected.
- Bringing people back into the town centres will revitalise areas this may relieve some pressure on green belt and on traffic and other factors in outline areas of the borough.
- There must be considerable evidence available to the Council to indicate that brownfield sites have been exhausted.
- Green Belt issue requires a sensible approach. It should always be the very last resort. Alternatives should be explored properly relating to the regeneration of town centre/ redundant urban space first before consideration of developing green belt.
- Whilst employment and housing are important every effort should be made to use alternative brownfield sites.
- The largest issue is not the lack of land but instead the planning conditions and Local Authority adoption issues presented when developing a site. An alternative would be for the Council to adopt a partnering agreement with Major Developers to streamline the process.
- Green Belt should only be released on an application case by cases basis so the need to circumvent special circumstances can be properly challenged based on the specific characteristics of the application.
- The Council acknowledged that other authorities in the same housing market area have 'no spare suitable brownfield land to meet St Helens needs'. St Helens

therefore must meet its own housing needs, and it has been demonstrated that Green Belt release is the only option to achieve this.

- In 2012, the need was stated in the Local Plan as 37ha, yet 3 years later it has increased by such a massive amount. What new housing and employment needs require such a huge amount of land to be developed and where is the evidence to show that all alternatives, including the existing brownfield sites in the Borough have been exhausted, generating the need to release Green Belt?
- The use of green belt land should be assessed on a case by case basis. If the amount of green belt land at Parkside is used then the impact on the local environment will be huge.

Council Response

The Council's proposed policy position concerning the need to release land out of the existing Green Belt in order to meet projected housing and employment needs over the Plan period is set out in Draft Policy LPA02 in Preferred Options Local Plan. The justification of this policy seeks to explain the rationale behind this approach in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

The Council recognises the importance of a comprehensive documented review of the Green Belt in support of this approach and has prepared a Draft Green Belt Review which will be subject to full consultation.

With regards to the need to release Green Belt land for employment use, please refer to the Council's response to Question 13 for further explanation.

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs

Summary of Comments

A summary of the comments made in relation to encouraging brownfield development is made below:

- A wider economic strategy would be more likely to utilise brownfield whereas logistics prefer flat green field sites as described in your supporting documents. This in the main because they are cheaper for the developer in what is a competitive transient industry which is land intensive and automated and has lower employment per area than other sectors and a lower regional multiplier.
- By ensuring competitively priced business rates for interested companies. The difficulty with this as is regularly evidenced across many areas of the UK is that following the removal of 'pump-priming' initial subsidies for developing employment opportunities, when business rates revert to less competitive levels, the

developments are abandoned as companies seek out more favourable financial circumstance. Evidence of this phenomenon is apparent across the North West.

- A detailed assessment that is made public of what the demand is and what land is available. This process needs to be utterly transparent.
- Any policies or approaches to planning that make it easier to develop on brownfield land (where it is constrained and viability of development is therefore questionable) may maximise the contribution of brownfield land to meeting housing and employment needs, but ultimately a realistic balance of (viable) brownfield and greenfield sites will be needed to meet housing and employment needs.
- The Council should embrace the potential for Development Orders to give “permission in principle” for allocated sites or those on a brownfield register, as proposed by the Housing & Planning Bill.
- The evidence base (including the SHLAA) has assessed the deliverability and viability of brownfield land to meet housing and employment needs, indicating the capacity is lower than first envisaged. Whilst there may be alternative means to help support the redevelopment of such sites, it is clear that in order to ensure a deliverable supply of housing and employment land during the Plan period that the Council cannot over rely on such sites to contribute towards identified needs.
- The Council already encourages the development of brownfield land to some extent through the implementation of the green belt which can direct development towards brownfield sites. Start by creating a catalogue of the land available and its characteristics. Gain an understanding of limitations and benefits of each site and then work out how to mitigate those limitations and socialise back.
- The Parkside site is in part brownfield and hence its release from the Green Belt and allocation for employment uses will significantly contribute to this objective.
- The Council should further assist by ensuring that the policy burdens applied to brownfield sites are commensurate to the viability challenges on such sites.
- The encouragement of brownfield land this should not justify a sequential approach to site selection on the basis of whether a site is previously developed. Such an approach is inconsistent with the Framework, which seeks to ‘encourage’ rather than ‘prioritise’ the development of previously developed land. The Council may need to use other powers rather than planning policy to bring forward such sites such as CPO or other funding mechanisms.
- The Local Plan should avoid the protection of brownfield employment sites within the M62 Link Road Corridor, where they are unsuitable, where there is no reasonable prospect that they will be used for that purpose, and/or where there is a need for different land uses to support sustainable communities.
- Many brownfield sites are not owned by developers but families and businesses. As planning is not their core business it can be seen as costly, time consuming and risky.
 - Removing charges for pre application advice for brownfield sites.
 - Continue to provide the excellent development team management service, one of the best in the North West.
 - Remove the need for the applicant to pay Council costs for the Section 106 appraisals.
 - Consider the use of Planning in Principle.

- Pragmatic approach to conditions.
- Reduce the affordable housing requirements and other Section 106 contributions for brownfield sites incentivising developers to continue to look to bring brown field sites forward.
- Grants for remediation should be given to force non Green Belt sites to be used. Regeneration and environmental improvement of the urban settlement will make those sites more attractive to developers who would otherwise regard housing within or near the green belt as more marketable

Council Response

The Council's proposed strategic policy position concerning the promotion of 'brownfield' land to meet housing and employment needs is set out in Draft Policy LPA02 in Preferred Options Local Plan. The policy seeks to continue the prioritisation of the reuse of previously developed land in sustainable locations in order to make a significant contribution to the housing land supply in particular. The use of previously developed land will be encouraged through: a) setting lower and more appropriate thresholds for developer contributions within existing urban areas to reflect viability constraints associated with regenerating sites; b) keeping an up to date Brownfield Register of suitable development sites.

The Council tries to bring forward existing brownfield employment sites to the market by keeping open dialogue with landowners and constantly looking for opportunities for funding to help make the development of sites more viable. However the Council, does not have the financial or staff resources to do this alone. Furthermore, even if all existing vacant employment land was brought forward, the sites are not of sufficient size or in suitable or competitive locations that the market requires. Therefore, there is no intention to bring a formal "brownfield first" approach as there is no guarantee that sufficient land will be developed and is likely to hinder the provision of a five year supply of housing land.

Regarding business rates, the Council does not set business rates.

The potential for Development Orders will be kept under review, but the first priority is to have a suitable range of sites allocated and available before Development Orders are considered.

The justification of this policy seeks to explain the rationale behind this approach in more detail with reference to the key evidence base documentation regarding objectively assessed housing and employment needs and the availability of brownfield land.

Regarding viability, the Local Plan aims to ensure the development of brownfield sites by setting threshold for developer contributions to levels that reflect viability of brownfield sites and the areas they are in, and to keep an up to date brownfield register to promote sites to potential developers.

At this stage, none of the sites proposed for allocation are granted Permission in Principle as the implications of Permission in Principle are not yet clear. Brownfield housing sites identified by the SHLAA will be considered for inclusion in the Council's Brownfield Register

when it is compiled, and this can indicate which sites are considered suitable for Permission in Principle.

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why?

Response	Number
Yes	13
No	28
Not Specified	171

Summary of Comments

From those consultees who responded yes, the following points were made:

- The use of an average density of 30dpha seems reasonable enough although clearly it may vary from site to site given local circumstances
- The density of 30 dwellings per ha would seem a reasonable figure but a reduced figure may be appropriate given that safeguarded land will likely be greenfield in nature. In addition, should safeguarded land also need to accommodate larger family dwellings with an associated lower density of development, a lower figure would be appropriate.
- The national Land Use Change Statistics identify that nationally densities are, on average, 32dph (net) across all sites including high density town / city centre schemes. On previously developed land the average density was 37dph and on greenfield land the average density was 26dph. The assumption of 30dph, is within this range and as such is generally appropriate, although a reduction would be warranted given that safeguarded land sites are likely to predominantly greenfield in nature.

From those consultees who responded no, the following points were made:

- This approach will result in poor outcomes for the borough. Housing should be built on an integrated and workable plan for the borough, taking into account the spirit and form of the planning legislation which was enacted for good reason. Simply building to target by advance ring fencing of the Green Belt and on a speculative basis is counter to the legislation.
- Density and net developable area is variable dependent on the size and location of the site, with smaller sites within the urban area likely to have higher density and developable area. In case of larger areas of Safeguarded land on the settlement periphery, it is likely that the net developable area will be significantly lower than the 75% stated, with a higher proportion of land required for infrastructure such as roads, services and public open space. Moreover, site specific constraints will ultimately impact on the developable area.

- The net developable area for a site will vary significantly dependent upon the type and size of site, ranging from 50% for a large strategic site with significant infrastructure works to 100% for a small urban infill. In terms of the safeguarded land sites these are all likely to require a reasonable amount of infrastructure provision and as average of 75% is likely to be too high.

Council Response

Comments received on the matter of setting an appropriate level of density for residential development have been acknowledged and recognise that densities will be need to be appropriate to context of the proposal area. The proposed approach to ensuring an efficient use of land set out in Draft Policy LPA05 along with justification. This will require new development to achieve a minimum of 30 dwellings per hectare (dph) in urban areas, between 30 to 40 dph in and adjacent to district and local centres and sustainable locations well served by frequent bus or train services, and densities of between 40 and 50 (dph) or above within St. Helens Town Centre and Earlestown Town Centre and within the edge of these Town Centres. Densities below 30 dph may be considered appropriate in areas characterised by lower densities, including certain low density suburban areas identified as Residential Character Areas, in the Green Belt and former Green Belt land now allocated for development.

The comments about the Net Developable Area assumed for sites are noted. It is accepted that some larger sites will require a larger area for infrastructure and this will be refined as the work moves forward. As a precaution, more land will be identified than is needed to allow for loss of developable area to infrastructure.

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why?

Response	Number
Yes	21
No	30
Not Specified	161

Summary of Comments

From those consultees who responded yes, the following points were made:

- This accords with the NPPF. The Council is required to demonstrate a five year supply of deliverable, viable and available housing sites. A similar approach should be adopted in respect of employment land.

From those consultees who responded no, the following points were made:

- 5 year safeguarded land supply for housing and employment is insufficient to positively plan for the Borough needs and growth over the plan period and beyond.
- Only if it is controlled and does not control the Green Belt.

- Green Belt should only be released in exceptional circumstances as per national planning law.
- We should always have a plan but a plan for the future should not be set in stone and should be flexible enough to meet changing needs. The use of any of our green spaces should be used as a last resort when all other options have been exhausted and then only sparingly as once these green spaces have gone they have gone forever.
- Securing fixed periods for development proposal can only benefit the well-being of local residents and provide some security with regard to their own aspiration and personal future planning. However these should be arrived at following genuine consultation with stakeholders, a process which currently appears to be lacking.
- It is considered that a longer period should be provided for in order to provide certainty over the Green Belt boundaries beyond the plan period. Para 85 of the NPPF says that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching well beyond the plan period and that Local Authorities should satisfy themselves that Green Belt boundaries will not be altered at the end of the development plan period. This is consistent with para 83 which states that once established Green Belt boundaries should be capable of enduring beyond the plan period.
- A period of 5 years would not meet this requirement of policy.
- As the Green Belt boundaries have been set since 1983/4 (i.e. 35 years when the Local Plan will be adopted), and the growth needs of the Borough are now likely to be significantly greater than the evidence base is outlining, a 5 year period for safeguarded land beyond the 2033 end plan date envisaged would result in a c 20 year boundary period only after which time a further boundary review would be required. This is not considered to meet the requirements of national policy for meeting longer term development needs and allowing boundaries to endure in the longer term.
- We do not consider that 5 years represents a period "stretching well beyond the Plan period as required by the NPPF (p 85) Whilst there is no specific guidance on how much land should be safeguarded a number of LPAs have tended to identify at least 10 years' worth of safeguarded land to ensure that the Green Belt boundaries retain a degree of permanence.
- Given the significant need for both types of employment and housing land, and the inherent risk that allocated sites in Local Plans may not be delivered on schedule, or at all within a plan period. A five year supply of safeguarded land is therefore not considered to be adequate for each of employment and housing land in the Local Plan.
- A 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157).

Council Response

The Council's approach to the removal of land from the Green Belt and safeguarding for a specified period to meet projected needs beyond the Plan period has been summarised in response to Question 2 above.

Q18. Are there any other forms of development that need to be accommodated in the Local Plan?

Response	Number
Yes	38
No	16
Not Specified	158

Summary of Comments

A summary of the comments made in relation to other forms of development is provided below:

- More industries with a high employment yield and with a range of skills.
- St Helens Council needs to aspire to greater the borough by improving the environment and building a strong diverse economy.
- Need to look at all options and go for a diverse approach ,not concentrating around one area, Parkside, and not focusing on one industry, logistics.
- Large scale logistics development as a component of B8 warehouse and distribution employment needs should be fully recognised in the Local Plan. Extra schools needed.
- Consideration needs to be given to all forms of employment land in addition to those within use classes B & A. There is a need for leisure (hotel, pub, and restaurant), sui generis (car showroom), trade parks etc. These could be accommodated within a variety of locations including major employment schemes and urban extensions which require a sustainable mix of uses to assist in place making and proper Master Planning.
- Council should set out relevant targets for new retail and leisure development over the plan period.
- Need for new doctors surgeries.
- Improved road infrastructure – currently this is unable to cope.
- Creation of new parkland and strategic landscape areas as an element of green infrastructure to urban extensions should be considered as a potential supporting development form.

Council Response

The Council acknowledges the comments made on other forms of development that should be provided. A summary of the how the Council proposes to approach to addressing this is summarised below.

Employment and Economic Development

The Council's propose approach to planning for a strong and sustainable economy is set out in detail in Draft Policy LPA04 of the Preferred Options Local Plan. The policy seeks to facilitate the provision of new jobs by ensuring a flexible supply of new high quality employment floorspace, utilising existing employment areas and St. Helens' strategic

location for logistics development through the allocation of a range of sites suitable for a range of employment uses. The rationale behind this policy is explained in the justification. With regards to the emphasis on logistics development, the response to Questions 3 and 13 provide further clarification.

With regards to retail and leisure, the Council has set out its proposed approach for meeting future needs in Draft Policy LPB01 based on emerging finding of an updated retail and leisure needs study (as referred to in response to Question 5)

Infrastructure

With regard to infrastructure, the Council acknowledges that there are existing capacity infrastructure issues. As stated in Draft Policy LPA08, following the consultation on the Preferred Options, the Council will prepare and Infrastructure Delivery Plan. This will specifically identify where additional infrastructure or service capacity is needed order for new development to be acceptable. This includes elements of 'social infrastructure' such as schools and healthcare facilities.

Green Infrastructure

The Council's proposed policy approach to the provision of green infrastructure has been summarised in response to Question 3 above.

Q19. Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report?

Response	Number
Yes	15
No	25
Not Specified	172

Summary of Comments

A summary of the comments made in relation to the Sustainability Appraisal is provided below:

- There is not enough emphasis on environment and climate change
- There are gaps principally on wildlife corridors and bio-diversity planning in the borough. Little information about the effects of traffic congestion and over population.
- The need to create overt plans to develop green infrastructure aligned with the likely high scale of development going forward.
- The scoping report should also look at the long term health implications of its inhabitants and that this is only enhanced not degraded.
- The SA should consider baseline economic data associated with the activities of the Combined Liverpool Regional Authority and the constraints of other areas to accommodate the economic opportunities offered by the SuperPort development.

- The need for balance between securing economic development and maintaining a community environment in which residents can take some pride, and also be confident that the quality of life for their families is considered worthy of some consideration via this and subsequent plans.
- Need to see sustainable jobs that have as low an impact on the local area as possible.
- The Local Plan should seek to locate development in sustainable locations that provide the opportunities to use a range of sustainable transportation modes.

Council Response

The 'St Helens Local Plan Sustainability Appraisal: Interim SA Report December 2016' has been prepared by consultants AECOM to inform the preparation of the Preferred Options Local Plan. This Interim SA report has considered response received in relation to the Sustainability Appraisal Scoping Report December 2016.

Section 2 of the Interim SA Report summarises out the key sustainability issues identified from the Scoping consultation and sets out the twenty SA objectives that have been established as a result of the scoping process. These are used as the basis for an SA framework against which an appraisal the proposed policies and sites in the Preferred Options has been made (sections 6 and 7). The appraisal covers all aspect of sustainability seeking assess the balance of environmental, economic and social factors. The appraisal framework considerations include climate change, impacts on wildlife, transport and air quality, health, employment and jobs amongst other issues.

Part 4.3 of the Interim report acknowledges the emergence of evidence being prepared on a City-Region wide basis (the emerging SHELMA) and its implications on the Local Plan.

Q20. Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?

Response	Number
Yes	22
No	18
Not Specified	172

Summary of Comments

A summary of the comments made in relation to the Draft Sustainability Framework is provided below:

- Strategic Aim 6 - Safeguarding and enhancing quality of life - there does not appear to be any respect or consideration for Green Belt commendations or DEFRA reports on pollution and health in these plans
- No biodiversity plan, no reference to connecting wildlife corridors - no reference to relevant DEFRA reports.

- There is no reference to any British legislation or European legislation concerning most of the points concerning the quality of life, health of the residents or the impact on wildlife.
- Objective 3 - Amend add additional criteria to: Is it located close to the strategic highways network to minimise vehicle movements through the Borough
- Objective 15 - Amend criteria to add: Is it located close to the strategic highways network to minimise vehicle movements through the Borough, and will it encourage inward investment and capture regional economic opportunities.
- Objective 16 - Amend to: To improve access to a range of good quality, family and affordable housing that meets the diverse and objectively assessed needs of the Borough.

Council Response

As set out in response to Question 19, section 2 of the Interim SA Report summarises out the key sustainability issues identified from the Scoping consultation and sets out the twenty SA objectives that have been established as a result of the scoping process. The Scoping Framework has then been set out in Appendix I.

With regards to specific reference to biodiversity strategies and legislation, the next stage of the plan (the 'Publication') will require a full SA Report and in compliance with the SEA regulations and Habitats Regulations Assessment (HRA) so will therefore need to be more comprehensive with respect to relevant plans, strategies and legislative requirements (please see response to Question 21 below).

Q21. Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan?

Response	Number
Yes	24
No	17
Not Specified	171

Summary of Comments

A summary of the other comments made in relation to the scope of the Sustainability Appraisal is provided below:

- The plan theme is developer driven in its tone. Appraisal of the plan should not be to justify a narrow range of developments but to appraise an overarching plan for the borough.
- Striving for economic growth is a wholly appropriate essential goal for any business organisation, including Local Councils. This should not be to the detriment of the current quality of aspiration and living conditions of current families and residents.

- The cumulative effect of Parkside and all the regional proposals for our motorways should be assessed.
- It important that the SA considers the economic and housing requirements of the region and the Mid Mersey SHMA
- There should be is a clear and transparent process to the assessment of all of the reasonable alternatives to meet the housing and employment requirements.
- More focus on Air Quality
- International and national conservation sites –likely impacts on environmental sites, such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Importance (SSSIs) and National Nature Reserves be considered when evaluating the suitability of nominated sites.

Council Response

As set out tin response to Question 19 the interim appraisal covers all aspect of sustainability seeking assess the balance of environmental, economic and social factors. The appraisal framework considerations include climate change, impacts on wildlife, transport and air quality, health, employment and jobs amongst other issues.

It should be noted that the interim SA Report does not constitute an 'SA Report' as defined by the SEA Regulations (i.e. the SA Report that should be prepared and consulted upon alongside the draft Local Plan at Regulation 19 stage of the Planning Regulations). Rather, this interim SA report documents the current stages of SA that have been undertaken to help influence the plan-making process. It is not a legal obligation to consult upon interim SA findings, but it is helpful to aid in decision making, as well as achieving effective and transparent consultation. The SA Report and HRA report on the next stage of the Plan (Publication) will therefore contain more detail with reference to designated environmental sites.

Any Other Information

Summary of Comments

A summary of the other comments made is provided below:

- St. Helens has totally "missed the bus" with regard to the Parkside Colliery site becoming a rail freight distribution centre. I would be surprised if any rail freight operator would want the expense of providing facilities that would compete with its own operations elsewhere. The danger is that a Parkside freight distribution centre would now become "road only".
- To create a freight terminal on the site at Parkside would lead to more traffic, poor air quality, and loss of Green Belt.

- Development should be shared equally across the parts of the Borough that can accommodate it so not to create a divide between over developed areas and areas with no investment.
- Need to become an innovative borough, look at empty units, shops, buildings and waste sites. Utilise them bring life back to the areas.
- We are not going to see the eventual merger of the urban sprawl across the Mersey Belt, the Green Belt must be protected because once it's gone it cannot be reinstated.
- Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.
- Green Infrastructure (GI) – plan should ensure that GI is an integral, cross-cutting theme. Good quality local accessible green space, ecosystems and actions to manage them sustainably offer a range of benefits, e.g.
 - Access to local greenspace can reduce health inequalities
 - Increased and improved accessibility to greenspace can help increase
 - physical activity
 - Contact with greenspace can help improve health and wellbeing
- Natural England's Accessible Natural Greenspace Standard (ANGSt) should be considered.
- The St Helens Local Plan will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information.
- Limiting the location, number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. Evidence to support this is not conclusive. No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.
- The character and identity of the Newton-le-Willows is strong and, as in the Core Strategy, should be considered as a standalone plan to develop amenities within the town.
- The present process requires a complete overhaul to ensure that the residents are afforded the opportunity to participate in what is a matter of extreme importance.
- These questions not user friendly to the public.

Council Response

Former Parkside Colliery and Approach to Planning for Employment Provision

The Council's response in relation to proposals for the former Parkside colliery and meeting strategic employment needs has been previously summarised in response to Questions 3, 4, 12 and 13.

Spatial Distribution

The Council's response in relation to proposals for the proposed distribution of development has been previously summarised in response to Question 4 above.

Geodiversity and Green infrastructure

The Council's approach to ensuring the protection of geodiversity and provision of green infrastructure is set out in Draft Policy LPA09. Draft Policy LPC06 specifically set out the approach to Biodiversity and Geological Conservation and Draft Policy LPC05 sets out the proposed approach to the provision of open space including draft standards for its accessibility based recent evidence.

Heritage

The Council's response in relation to proposals for the proposed distribution of development has been previously summarised in response to Question 3 above.

Earlestown/Newton-le-Willows

The Council acknowledges the importance Newton-le-Willows and Earlestown as the largest distinct Key Settlement after the Core Area of St. Helens. Draft Policy LPB02 of the Preferred Options Local Plan sets out the position of safeguarding the function and role of Earlestown Town Centre as the second town centre within the Borough. Its carries forward from the Core Strategy the intention to produce and implement an Area Action Plan to address key issues relating to the town.

Hot Food Takeaways

The Council's approach to placing limitations on the location of hot food takeaways is set out in Draft Policy LPD10. This carries forward the position taken by the adopted Hot Food Takeaway SPD (June 2011). It is considered that the justification to this approach based on the evidence detailed in the SPD remains valid. –

Consultation Process

The Council understands that the questions asked in relation to this and other Local Plan consultations can present a degree of complexity which in turn can be off putting. However, given the inherent technicality of certain planning matters, a balance must be struck in order to obtain a meaningful response from a wide range of consultees. The Council makes every efforts to explain and guide people through the consultation process and whilst would encourage the use of official response forms, will accept written responses in the form of letters or emails. The Council will continue to increase efforts to ensure the process is as accessible as possible to people including production of guidance notes, FAQs and information on our website.

Appendix 1: Response Form



St. Helens
Council

St. Helens Local Plan Scoping Consultation

January 20th - March 2nd 2016

Response Form

By completing this Response Form, you are writing to make comments on the proposed Scope of the new St. Helens Local Plan. If you wish submit information as part of the 2016 Call for Sites or representations on the Bold Forest Park AAP Publication Draft, there are separate forms available for these that must be completed separately.

For help in completing this form, please contact a member of the Development Plans team by telephone on 01744 676190 or email planningpolicy@sthelens.gov.uk.

Your contact details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact. Please be aware that anonymous forms cannot be included and that in order for you to submit your form you must include your details below.

	Your details	Your agent's details
Title		
Name		
Position		
Organisation		
Address		
Town		
County		
Postcode		
Telephone		
Email address		

Would you like to be updated of future stages of the Local Plan Process? Please tick one below. We will update you when there are consultations on the Local Plan document, submission of the Plan for Examination, the issuing of recommendations by the Inspector and the adoption of the Plan by the Council. The Planning Policy website will also have more regular updates. We prefer to send any updates by email as this is faster, cheaper, more environmentally friendly and stays with you if you move home.

☐ Yes, by email ☐ Yes, by post (I do not have an email address) ☐ No

The following questions relate to the various section of the Local Plan Scoping Consultation Document available to view and download at <http://www.sthelens.gov.uk/planningpolicy>.

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q3. Do you think there are any other particular issues, plans or strategies that need to be taken into account, and what evidence exists to support this? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. Please tick one box and explain why below. Please be as specific as possible regarding the changes required.

☐ Yes

☐ No

Comments:

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required. *Please tick one box and explain why below. Please be as specific as possible regarding the changes required.*

☐ Yes

☐ No

Comments:

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required. *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Q.12 What level of economic growth do you think St. Helens should plan for? Does the objectively assessed need of 178.5ha up to 2033 seem appropriate for St. Helens?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q.13 Do you think the proposed process from moving from objectively assessed needs to an employment land requirement is robust and appropriate? Should any other factors be considered when assessing an appropriate employment land requirement?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs?

Comments:

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q18. Are there any other forms of development that need to be accommodated in the Local Plan? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q19. Do you think the draft SA Scoping Report identifies the key local sustainability issues within St. Helens? Are there any additional issues that the Scoping Report should cover? Is there any other evidence base that could inform the Scoping Report? Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q20. Do you have any comments to make on the draft sustainability framework presented in the draft Scoping Report?

Please tick one box and explain why below.

☐ Yes

☐ No

Comments:

Q21. Do you have any other comments to make regarding the scope of the SA and the proposed approach to appraise the Local Plan? *Please tick one box and explain why below.*

☐ Yes

☐ No

Comments:

Any Other Information

Please tell us anything else of relevance, if not already covered above. Please continue on a separate sheet, if necessary.

Please return this form and accompanying sheets/maps, etc. by
12:00 (noon) on Wednesday 2nd March 2016 by email or by freepost to ensure your comments are fully considered in the next stages of the Local Plan.

Return by email to:

planningpolicy@sthelens.gov.uk

Return by freepost (no stamp required) to:

St.Helens Council
Freepost RLYY-RYXG-HYHS
Chief Executive's Department, Development Plans,
Town Hall, Victoria Square, St.Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the St.Helens Local Plan.

Data Protection Statement

The personal information provided on this form (address, contact details, signature) will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St.Helens Local Plan to adoption. However, your name and representation will be made publicly available and cannot be treated as confidential.

St.Helens Council offers a translation and interpretation service covering foreign languages, British Sign Language, Braille and audio tape.

For a translation of any St.Helens Council publication, please provide your name and address and the name of the language you require to the Contact Centre, quoting the title and/or reference number of the document.

Jeśli chcieliby Państwo otrzymać tłumaczenie jakiegokolwiek publikacji Rady St Helens, prosimy o podanie nazwiska, adresu i nazwy wymaganego języka do Centrum Kontaktowego, podając tytuł i/lub nr referencyjny dokumentu.

Para recibir una traducción de cualquier publicación del St Helens Council (Consejo del municipio de St Helens), por favor indíquenos su nombre y dirección y el idioma con el que se comunicará con el Contact Centre (Centro de Contacto), así como el título y/o el número de referencia del documento.

St Helens کاؤنسل کی کسی بھی اشاعت کے ترجمہ کے لئے، براہ مہربانی رابطہ مرکز کو اپنا نام اور پتہ دیں اور اس زبان کا نام جس میں ترجمہ کی ضرورت ہے، اس دستاویز کا عنوان اور/یا حوالہ نمبر دیتے ہوئے۔

St Helens काँउन्सिल के किसी प्रकाशन के अनुवाद के लिए कृपया सम्पर्क केन्द्र को अपना नाम, पता और उस भाषा का नाम जिसकी आपको आवश्यकता है, डाक्यूमेंट का नाम तथा संदर्भ संख्या को उद्धृत करते हुए दें।

若要获取 St Helens 委员会任何刊物的译文，请将您的姓名、地址和语言 种类告知“联系中心”，并注明文件标题和/或编号。

Para sa pagsasalin ng kahit na anong publikasyon ng St Helens Council, paki paalam ang inyong panaglan at address at ang pangalan ng lenguwaheng kailangan niyo sa Contact Centre, paki saad ang titulo at/o numerong reference ng dokumento.



Contact Centre, Wesley House, Corporation Street,
St.Helens, Merseyside WA10 1HF.



Tel: (01744) 456789
Minicom: (01744) 671671
Fax: (01744) 456895



contactcentre@sthelens.gov.uk



www.sthelens.gov.uk

APPENDIX 7: LIST OF THOSE WHO MADE REPRESENTATIONS AT LPPO STAGE

(N.B. 5,581 'private' individual names have been excluded from this list)

Barton Willmore	De Pol Associated on behalf of Metacre Ltd.
Barton Willmore on behalf of Andrew Cotton	Dickman Associates Ltd. on behalf of Legh Trust
Barton Willmore on behalf of Avenbury Properties	DLP Planning Ltd. on behalf of Mr P. Reynolds
Barton Willmore on behalf of Church Commissioners for England	DPP Planning on behalf of Tesco Stores Ltd
Barton Willmore on behalf of Jones Homes (North West) Ltd.	Edward Landor Associates
Barton Willmore on behalf of Millar Homes	Edward Landor Associates on behalf of Z. Mallik
Bell Ingram Design Ltd. on behalf of Essar Oil	Emery Planning on behalf of Wainhomes (North West) Ltd.
Bell Lane Plot Owners.	Environment Agency
Billinge & Seneley Green PC	Frank Marshall & Co. on behalf of Mr Platt
Billinge Chapel End PC	Frost Planning on behalf of English Land Ltd.
Canal & River Trust	Great Sankey PC
Carmel College	GVA on behalf of Miller Developments
Cass Associates on behalf of Redrow Homes Ltd.	Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.
Cassidy + Ashton on behalf of FDL Packaging Group	Helen Howie on behalf of Wallace Land Investments
Cassidy + Ashton on behalf of the Jones family	Highways England
Cllr De Asha	Historic England
Cllr Glover	Hollis Vincent
Cllr Haw	Home Builders Federation
Cllr K Deakin	Homes & Communities Agency
Cllr Long	How Planning on behalf of Taylor Wimpey UK Ltd.
Cllr McCauley	Indigo Planning on behalf of Barratt Homes
Cllr Mitchell (Burton & Winwick Ward)	J Rosbottom
Cllr Preston	JLL on behalf of Suttons Group
Cllr Sims	Jockey Club Racecourse Ltd.
Cllrs Bond, Burns & Banks	Kingsland Strategic Estates Ltd.
Cllrs Glover, Neal & Baines	Knowsley Council
Cllrs Gomez-Aspron, Bell & Dyer	Lane Head Residents' Association
Cllrs Jones, Mussell & Reynolds	Liverpool St Helens FC
CPRE	McAteer Associates Ltd. on behalf of Eccleston Homes Ltd.
Croft PC	McGinn MP
Cronton PC	Merseyside Fire & Rescue Authority
Culcheth and Glazenbury PC	Merseytravel
Davis Meade on behalf of J. & J. Kay	

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

<p>Michael Sparks associates on behalf of Canmoor Developments Ltd. MWA on behalf of J Murphy and Sons Ltd. N. Cliffe Nathaniel Lichfield & Partners on behalf of Taylor Wimpey UK Ltd. Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd. National Farmers Union (NFU) Natural England Network Rail Newton Resident & Friends Assoc. Nexus Planning on behalf of BXB Ltd Nexus Planning on behalf of NHS Property Services Parish Cllr Trisha Long Parkside Action Group Pegasus Group on behalf of Redrow Homes North West Persimmon Homes North West Peter Brett Assoc. on behalf of Smith Property Developments and Interland Pilkington Sailing Club PWA Planning on behalf of JMB Farming PWA Planning on behalf of Mr L. Martin Rainford Action Group Rainford Heritage Society Rainhill Civic Society Rainhill PC Residents Against the Development of Green Belt - Rainhill Residents of French Fields</p>	<p>Ruth Jackson Planning on behalf of Fuavel/McMahon/Platt/Gascoyne Ruth Jackson Planning on behalf of Gascoyne Holdings Ltd. Save our Green Belt & Residents against Florida Farm Development Savills (UK) Ltd. on behalf of the Knowsley Estate Savills on behalf of Crown Golf Sefton Council Spawforths on behalf of Network Space Spawforths on behalf of Parkside Regeneration LLP Sport England The Coal Authority The Emerson Group on behalf of Orbit Investments (Properties) Ltd. The Planning Bureau Ltd. on behalf of McCarthy & Stone Torus Housing Turley on behalf of Peel Holdings (Land and Property Ltd) and Peel Energy Turley on behalf of Story Homes North West Ltd. United Utilities Wargrave Big Local Warrington Borough Council West Lancashire Council Wigan Council Wildlife Trust for Lancashire, Manchester & North Merseyside Winwick PC Y. Fovargue MP for Makerfield</p>
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APPENDIX 8: LETTER SENT OUT AT LPPO STAGE



St. Helens Council



ADDRESS

Local Plan Preferred Options
Consultation
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

Tel: 01744 676 190
Email: planningpolicy@sthelens.gov.uk

Date

□

Consultation on the St. Helens Local Plan Preferred Options 2018-2033 – The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 18

Dear Sir/Madam,

St. Helens Council is consulting on its "Preferred Options Local Plan 2018-2033" from 5th December 2016 to 12 noon 30th January 2017. This sets out the Council's Preferred Options for policies for dealing with planning applications, how much development there should be and the Council's preferred locations where it thinks that new development up to 2033 and beyond would be acceptable in principle. The Council believes that to meet the need for housing and employment land, this will require not only recycled brownfield land but also an amount of Green Belt land, especially in the period beyond 2033.

The Preferred Options Local Plan document and supporting documents contain more information about all of the sites and why we have chosen them. You can view the Plan, accompanying maps and evidence at <https://www.sthelens.gov.uk/localplan>, at St. Helens Regeneration Reception, Ground Floor, St. Helens Town Hall, 9 am – 5 pm Monday to Friday and at St. Helens Council libraries (see <https://www.sthelens.gov.uk/libraries/find-your-library/> for locations and opening times). The web page also contains answers to Frequently Asked Questions about the Plan, details of consultation events and how to make comments on the Plan.

You can make comments on the Preferred Options Local Plan **until 12 noon on Monday 30th January** by using our on-line comment form at <https://www.sthelens.gov.uk/localplan>, by email: planningpolicy@sthelens.gov.uk or by post (see address at the top right hand of this letter). If sending an email or a letter, please use the consultation form available online or at libraries.

Council Officers will consider all comments when preparing the next version of the Local Plan, which will be published for a final consultation in Summer 2017. Then the Plan and the comments will be examined by an independent Planning Inspector later in 2017, who will recommend if the Plan can be adopted by the Council or not.

Yours sincerely,

Development Plans Manager

www.sthelens.gov.uk

APPENDIX 9: COMMENTS FORM & GUIDANCE NOTE AT LPPO STAGE



St.Helens Local Plan Preferred Options Consultation

Ref: LPPO2016

(For official use only)

St.Helens Council **5th December 2016 – 12 noon 30th January 2017**
Comments Form

By completing this form, you are writing to make comments on the 'Preferred Options' of the new St.Helens Local Plan. You can also use this form to make comments on the accompanying Draft Green Belt Review, Sustainability Appraisal, Habitats Regulations Assessment and other supporting evidence documents. All documents are available to view and download on the Council's website:

www.sthelens.gov.uk/localplan

Please complete Parts 1 and 2 of this form and ensure it is returned to us by **no later than 12 noon on Monday 30th January 2017**. **Please note** that any comments received after this deadline cannot be accepted. For further guidance in completing this form, please read the accompanying Guidance Note.

Part 1 – Your Contact Details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact. Please be aware that anonymous forms cannot be included and that in order for you to submit your form you must include your details below.

	Your details	Your agent's details
Title		
Name		
Position		
Organisation		
Address		
Town		
County		
Postcode		
Telephone		
Email address		

Would you like to be updated on future stages of the Local Plan process?

Please tick one below. We will update you when there are consultations on the Local Plan document, submission of the Plan for examination, the issuing of recommendations by the inspector and the adoption of the Plan by the Council. The Planning Policy website will also have more regular updates. We prefer to send any updates by email as this is faster, cheaper, more environmentally friendly and stays with you if you move home.

Yes, by email	<input type="checkbox"/>	Yes, by post (I do not have an email address)	<input type="checkbox"/>	No	<input type="checkbox"/>
---------------	--------------------------	---	--------------------------	----	--------------------------

Part 2 – Your Comments

The following questions relate to various sections of the Local Plan 'Preferred Options' consultation document available to view and download at: www.sthelens.gov.uk/localplan

Please note, **you do not have to answer every question**; only those that relate to a part of the Plan you are interested in. Please continue on a separate sheet if necessary.

A) Housing and Employment

Q1. Do you agree with the proposed approach to the distribution of development as set out in the Spatial Strategy in Policy LPA02? Please tick one box

Yes ☐

No ☐

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q2. Do you agree with the proposed amount of employment land required in Policy LPA04? Please tick one box

Yes ☐

No ☐

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q3. Do you agree with the proposed number of houses required in Policy LPA05?

Please tick one box

Yes ☐

No ☐

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Q4. Do you agree with the proposed release of Green Belt land set out in Policy LPA02?

Please tick one box

Yes ☐

No ☐

Please explain why

Please type or write your comments here

If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

B) Other Policies and Site Allocations

Q5. Do you have any other comments to make in relation to a particular policy, paragraph or site contained in the Plan? If so, please use the boxes below specifying what your comments relate to.

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

Policy / Paragraph / Site:

Please specify

Do you agree with the preferred approach?

Yes ☐

No ☐

Please explain why. If no, what alternative approach would you suggest? (Either listed in the Plan or your own alternative)

Please type or write your comments here

C) Draft Green Belt Review

Q6. Do you have any specific comments to make in relation to the Draft Green Belt Review? If yes, please specify below.

Paragraph/Reference:

Comments:

Please type or write your comments here

D) Sustainability Appraisal, Habitat Regulations Assessment and other evidence base documents (including housing and employment)

Q7. Do you have any specific comments to make in relation to the Sustainability Appraisal, the Habitat Regulations Assessment or any other evidence base document such as those relating to housing or employment? If yes, please specify below.

Document:

Paragraph/Reference:

Comments:

Please type or write your comments here

Document:

Paragraph/Reference:

Comments:

Please type or write your comments here

Any Other Comments

Please tell us anything else of relevance, if not already covered above. Please continue on a separate sheet, if necessary.

Please type or write your comments here

Returning This Form

Please return this form and any accompanying extra sheets/maps/plans, etc. by **12:00pm (noon) on Monday 30th January 2017** either via email or by post to ensure your comments are fully considered when preparing the next stage of the Local Plan.

Return by email to:

planningpolicy@sthelens.gov.uk

Return by post to:

Local Plan Preferred Options Consultation,
St.Helens Council, Town Hall, Victoria Square,
St.Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the final draft of the St.Helens Local Plan scheduled for the consultation later in 2017.

Data Protection Statement

The personal information provided on this form (address, contact details, signature) will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St.Helens Local Plan to adoption. However, your name and representation will be made publicly available and cannot be treated as confidential.

Equalities Monitoring Information (Voluntary)

St.Helens Council delivers services to a diverse community where people may have different needs depending on their age, gender, disability or ethnic group. St.Helens Council is working to ensure people are not disadvantaged in receiving a quality service because of these differences. Equality does not mean that all people should be treated the same. Nor does it mean that one group is favoured over another. It simply means that we may need to adjust the way we deliver services to ensure that all people experience the same quality.

We would like to know if there are particular issues common to people from the same groups; be it gender, age, disability or ethnicity. That is why we would like you to fill this section in. We can use the information to improve our services and ensure that different people receive equal quality of service.

Submission of this information **is entirely voluntary**. The Council holds the information from this section of the form confidentially. Your personal details are protected under the Data Protection Act. This means that it is illegal for the Council to share them with any person, agency or organisation, other than for the stated purpose.

Please complete the questions below and help us find out what people really feel about our services.

Gender

Male

☐

Female

☐

Age

Please mark an 'x' or next to your age group:

0-4 5-11..... 12-16..... 17-18..... 19-21..... 22-44..... 45-64..... 65-74..... 75-84..... 84 +.....

Disability

Do you consider yourself disabled? If yes, please mark an 'x' next to the appropriate description:

Physical Disability..... Sensory Disability..... Mental Health..... Learning Disability.....

Any other disability (please describe)

Ethnicity

How would you describe your ethnic group? Please mark an 'x' next to the appropriate description:

<p>(a) White</p> <ul style="list-style-type: none"> British Irish Traveller / Gypsy Any other White background <p>(Please write below)</p> <p>.....</p>	<p>(c) Asian or Asian British</p> <ul style="list-style-type: none"> Indian Pakistani Bangladeshi Any other Asian background <p>(Please write in below)</p> <p>.....</p>
<p>(b) Mixed or Mixed British</p> <ul style="list-style-type: none"> White and Black Caribbean White and Black African White and Asian Any other mixed background <p>(Please write in below)</p> <p>.....</p>	<p>(d) Black or Black British</p> <ul style="list-style-type: none"> Caribbean African Any other Black background <p>(Please write in below)</p> <p>.....</p>
	<p>(e) Chinese, Chinese British or other ethnic group</p> <ul style="list-style-type: none"> Chinese Any other <p>(Please Write below)</p> <p>.....</p>



St.Helens Council

Contact Centre

Wesley House
Corporation Street
St.Helens
WA10 1HF

Tel: 01744 676789

Minicom: 01744 671671

→ www.sthelens.gov.uk/contactus

Please contact us to request translation of Council information into Braille,
audio tape or a foreign language.



St. Helens
Council

St. Helens Local Plan Preferred Options Consultation December 5th 2016 - January 30th 2017

Comments Form Guidance Note

This guidance note provides information on how to fill in and submit the official comments form for the public consultation on 'Preferred Options' of the new St. Helens Local Plan. If you have any queries regarding the completion of the form or seek further information please contact us.

Telephone: 01744 676190

Email: planningpolicy@sthelens.gov.uk

Web: <https://www.sthelens.gov.uk/localplan>

Part 1 – Your Contact Details

You are requested to fill out your personal details if your comments are to be registered and considered. If you are, or have an agent employed to act on your or someone else's behalf, please fill out both your own and your agent's / client's details.

Please be aware that any anonymous response forms cannot be accepted and considered. Only your **name and comments** will be made publicly available. All other personal details will be treated as confidential.

If you would like to be kept updated on the next stages of the St. Helens Local Plan then please indicate using the tick box. E-mail is the Council's preferred method of communication but if no e-mail address is provided, we will contact you via your postal address.

Part 2 – Your Comments

In order to answer these questions, please take time to read and consider the draft planning policies and sites allocations that are of interest to you in the **St. Helens Local Plan 'Preferred Options' December 2016** document – 'the Plan'. A table of contents and schedule of policies can be found on pages I - III of the Plan to help direct you to parts you are interested in.

Please note, **you do not have to answer every question**; only those that relate to a part of the Plan you are interested in. Please continue on a separate sheet(s) if necessary.

The Plan and other accompanying documents including the Draft Green Belt Review Sustainability Appraisal, Habitats Regulations Assessment and supporting evidence documents are available to view and download on the Council's website:

<https://www.sthelens.gov.uk/localplan>

A) Employment and Housing

Questions 1-4 of the form relate to the key matters of planning for future employment and housing in the Borough and the related release of land from the Green Belt. Please complete

this section of form to let us know whether or not you agree with the Council's preferred policy approach to these matters. Please indicate your view by ticking 'yes' or 'no' in the boxes provided. Then please use the relevant comments box to explain the reason(s) for your choice.

B) Other Policies and Site Allocations

Question 5 of the form provides opportunity to comment on all other matters covered in the Plan, including policies and site allocations. Please specify which section of the Plan you wish to comment on (for example a specific policy, paragraph or site) and then provide your views in the comments box. Please use the subsequent boxes to provide comments relating to another matter.

C) Draft Green Belt Review

Question 6 of the form provides opportunity to comment on the Draft Green Belt Review document. Please specify which part(s) of this document you wish to comment on, and then provide your views in the comments box.

D) Sustainability Appraisal, Habitat Regulations Assessment and other evidence base documents

Question 7 of the form provides opportunity to comment on the accompanying Sustainability Appraisal, Habitat Regulations Assessment or any other supporting evidence base document referenced in the Plan such as those relating to housing or employment. Please specify the document's name and relevant part(s) you wish to comment on, and then provide your views in the comments box. Please use the subsequent boxes to provide comments relating to another document.

Any other information

Please use the final section of the form to highlight anything else of relevance if you have not been able to cover this in previous sections of the form. Please continue onto a separate sheet if necessary.

Returning the Form

Please return this form and any accompanying sheets / maps/ plans, etc. by **12:00pm (noon) on Monday 30th January 2017** by email or post to the addresses below to ensure your comments are fully considered when preparing the next stage of the Local Plan.

<i>Return by email to:</i>	<i>Return to:</i>
planningpolicy@sthelens.gov.uk	Local Plan Preferred Options Consultation, St.Helens Council, Town Hall, Victoria Square, St.Helens, WA10 1HP

What happens next?

The Council will consider all the comments made throughout the public consultation process and take them into account when preparing the final draft of the St.Helens Local Plan scheduled for the consultation later in 2017.

Data Protection Statement

The personal information provided on this form (address, contact details, signature) will be processed in accordance with the requirements of the Data Protection Act 1998. It will be treated as confidential and used only to progress the St.Helens Local Plan to adoption. However, your name and representation will be made publicly available and cannot be treated as confidential.

St.Helens Council offers a translation and interpretation service covering foreign languages, British Sign Language, Braille and audio tape.

For a translation of any St.Helens Council publication, please provide your name and address and the name of the language you require to the Contact Centre, quoting the title and/or reference number of the document.

Jeśli chcieliby Państwo otrzymać tłumaczenie jakiegokolwiek publikacji Rady St Helens, prosimy o podanie nazwiska, adresu i nazwy wymaganego języka do Centrum Kontaktowego, podając tytuł i/lub nr referencyjny dokumentu.

Para recibir una traducción de cualquier publicación del St Helens Council (Consejo del municipio de St Helens), por favor indíquenos su nombre y dirección y el idioma con el que se comunicará con el Contact Centre (Centro de Contacto), así como el título y/o el número de referencia del documento.

St Helens کاؤنسل کی کسی بھی اشاعت کے ترجمہ کے لئے، براہ مہربانی رابطہ مرکز کو اپنا نام اور پتہ دیں اور اس زبان کا نام جس میں ترجمہ کی ضرورت ہے، اس دستاویز کا عنوان اور/یا حوالہ نمبر دیتے ہوئے۔

St Helens काँउन्सिल के किसी प्रकाशन के अनुवाद के लिए कृपया संपर्क केन्द्र को अपना नाम, पता और उस भाषा का नाम जिसकी आपको आवश्यकता है, डाक्यूमेंट का नाम तथा संदर्भ संख्या को उद्धृत करते हुए दें।

若要获取 St Helens 委员会任何刊物的译文，请将您的姓名、地址和语言 种类告知“联系中心”，并注明文件标题和/或编号。

Para sa pagsasalin ng kahit na anong publikasyon ng St Helens Council, paki paalam ang inyong panaglan at address at ang pangalan ng lenguwaheng kailangan niyo sa Contact Centre, paki saad ang titulo at/o numerong reference ng dokumento.



Contact Centre, Wesley House, Corporation Street,
St.Helens, Merseyside WA10 1HF.



Tel: (01744) 456789
Minicom: (01744) 671671
Fax: (01744) 456895



contactcentre@sthelens.gov.uk



www.sthelens.gov.uk

APPENDIX 10: LPPO 2018-2033 ARTICLES AND ADVERTS IN THE LOCAL NEWSPAPERS

ADVERTISEMENT FEATURE

St.Helens 2033...

We want to know your views on our ambitious plans to build new homes and businesses in the borough, transforming our local economy.

Our plans to boost local jobs...

St.Helens is a great place to be. Ideally situated in the heart of the northwest, on the motorway and national rail networks, with links to exciting new regional projects such as the new Superport at the Port of Liverpool, and within four hours' drive of 35 million people, it's no wonder the future for the borough is looking rosy.

But to enable us to capitalise on these distinct advantages and to realise the benefits that growth and development can bring we need to release land for employment use in key locations, as

well as providing a greater range of housing and more affordable homes for local people.

We are currently holding a public consultation on our ambitious plans to transform St.Helens, with a draft 30-year vision for growth, known as the Preferred Options of the Local Plan. This plan sets out how many new homes need to be built and how much employment land needs to be found in order to secure future growth. The plan also states where in the borough that this development should take place. Locations astride the M6 and M62 motorways are particularly attractive for large

scale development especially for companies within the logistics and distribution sector. The availability of new well located employment land is essential to St.Helens economic prosperity as not being able to supply this kind of land will simply result in companies relocating to regions further along the motorway network.

Unemployment in the borough is currently at 5.9% a reduction from 7.5% last year, however this is still above north west and national averages, and youth unemployment is high with one in three 18-24 year olds unemployed in the borough. The release of employment land will allow us to meet the boroughs need for economic growth and create more job opportunities to bring more local people of working age back into employment or offer a greater choice to the existing workforce. It will also give our young people an opportunity to access employment on their own doorstep and will help stop the increasing numbers of young people who move away from the area in search of employment. The creation of jobs also reduces the amount of people dependent on claiming benefits within the borough, as well as generally increasing the amount of money in the local economy. This in turn can support local businesses, retailers and service providers, and so further aid the creation of more jobs locally.

As well as our plans to support new business growth, we will also work to protect all our existing employment sites within St.Helens, with 38 key industrial and business sites earmarked for ongoing protection.

Securing future growth Our plans to build new homes and businesses in St.Helens.

**St.Helens Council are consulting on
the Borough's emerging Local Plan.**

Housing



**Increase in population
& creates employment**

Jobs



**Increase in
household income**



**Supports local
retail and services**



**Further creation
of new jobs**



Our plan for growth will see...



Housing

- 8550 new homes by 2033
- 570 new homes each year
- 59% to be built on brownfield land



Jobs

- 306 hectares of new employment land
- Potential creation of around 10,000 new jobs
- Protect existing businesses and employment sites



Infrastructure & environment

- Protect public parks and sports facilities
- Provide opportunities to solve existing infrastructure issues and risk of flooding
- Control opening of new hot food take-aways near schools

ADVERTISEMENT FEATURE

Shaping our future

What will this mean for the green belt?

59% of new homes will be built on brownfield sites, but there are insufficient numbers of these sites to accommodate all our housing and employment needs for the next 30 years, and this will mean that green belt land will need to be released.

As a council we have been very successful in the past at directing development to brownfield land, but it was inevitable that at some point this kind of land would run out and therefore other options, such as the green belt, would need to be considered for release. This is especially so given the significant amount of green belt in the borough.

If proposals are approved, then just over a thousand hectares would be released from the local green belt, signalling the first time that the green belt has been significantly altered since it was designated in 1983.

But St.Helens certainly has the available space to accommodate new growth, with currently only 29% of our land built upon. Another 6% is listed as open green space like Sherdley and Victoria Parks, meaning they are protected from development. Whilst a massive 65% of the borough is currently designated green belt - the highest proportion of all Merseyside boroughs - and much higher than even leafy Cheshire East at 35%.

If proposals are approved over half of the borough, 56%, will remain green belt. This would still leave St.Helens with a considerably higher proportion of green belt than other Merseyside regions, especially since they too are considering release of (or have already released) green belt land to support their plans for growth.

In addition to a total of 62% green belt and open green space in the borough, we would also benefit from the new homes, jobs and investment in our region that growth would bring.

The on-going regeneration of brownfield land remains one of our top priorities too, and the majority of housing within the new plan will come from these sites. In addition, some of these brownfield sites have been cleaned up and returned to nature, like the former coal mines, waste tips and industrial sites in the Bold Forest Park, so in turn increasing our number of open green spaces.

We want to ensure that not only this generation but future generations have the best possible choice of affordable housing and jobs in a quality environment. If we fail to take action and shape the growth and development open to us, then the investment, jobs and homes will go elsewhere and in these difficult times that is an opportunity that we don't want to miss.

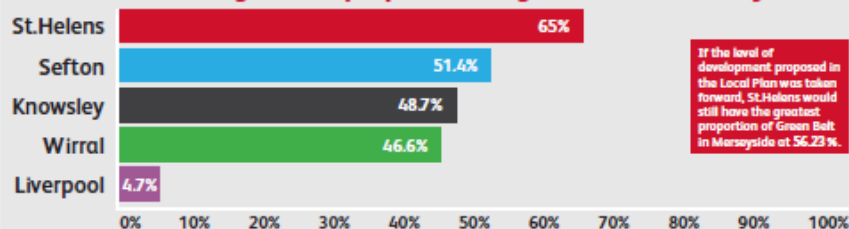
Our plans to build more affordable homes

An assessment of St.Helens housing land need and supply was carried out by independent assessors, who found that there was a requirement for more housing in St.Helens, in order to meet need, respond to economic growth and create a wider choice and greater affordability for local residents. A wider selection of housing stock is needed, ranging from executive homes to the more affordable, as well as a number of specialist homes which can be adapted to support the needs of those with a disability or the elderly.

Our projections highlight the need to build 570 new homes a year to deal with a growing population, housing shortfalls and the needs of the local economy. Starting now and continuing over the next 15 years to 2033, we require an additional 8550 new homes. We have identified 47 brownfield sites which we expect to deliver 2497 new homes in the coming years. We currently have an additional 31 brownfield sites that are currently under construction or have planning permission, which will deliver a further 2247 new homes. It is anticipated that 1365 new homes will come forward on unknown (windfall) brownfield sites.

In addition to housing and jobs the plan looks to protect St.Helens parks and designated open green spaces and in areas where new developments are earmarked, it will allow us to look again at existing infrastructure issues and put measures in place to resolve them. As part of the plan we will develop an Infrastructure Delivery Plan which will look at requirements resulting from the development, such as where increased school capacity will be needed.

St.Helens has the greatest proportion of green belt in Merseyside.



St.Helens Council

Now is the time to have your say...

Local Plan drop in sessions

We are holding a number of local drop in sessions in neighbourhoods across St.Helens. These sessions are open to all and will give you an opportunity to view the plan and get the answers to any questions you may have from a member of our Planning Policy Team. Drop in sessions are available at:

Eccleston Library
Wednesday 7th December,
2.00pm - 6.30pm

Garswood Library
Thursday 8th December,
2.00pm - 6.30pm

Haydock Library
Friday 9th December,
2.00pm - 6.30pm

Central Library
Saturday 10th December,
11.00am - 3.30pm
Saturday 14th January,
11.00am - 3.30pm

St.Helens Town Hall
Wednesday 21st December,
10.00am - 5.30pm
Thursday 12th January,
10.00am - 5.30pm

Rainford Library
Monday 12th December,
2.00pm - 6.30pm

Chester Lane Library
Tuesday 13th December,
2.00pm - 6.30pm

Newton-le-Willows Library
Thursday 15th December,
2.00pm - 6.30pm

Rainhill Library
Monday 19th December,
2.00pm - 6.30pm

Thatto Heath Library
Tuesday 20th December,
2.00pm - 6.30pm

For more information on the Local Plan visit; sthelens.gov.uk/localplan, email; planningpolicy@sthelens.gov.uk or call 01744 676190



St.Helens Council

APPENDIX 11: CALL FOR SITES FORM



St. Helens Local Plan "Call for Sites" site suggestion form

For Office Use Only		
Date received:		
Scanned/ saved:		
Plotted:		
Site Ref:		
SHLAA Site Ref		

For help in completing this form, please see the accompanying Guidance Note, or contact a member of the Planning Policy team by telephone on 01744 676190 or by email to planningpolicy@sthelens.gov.uk.

Data Protection and Freedom of Information

We need your permission to hold your details on our database.

I agree that St. Helens Council can hold the contact details and related responses and I understand that they will only be used in relation to Community and Planning Policy matters.

Signed		Date	
--------	--	------	--

This information is collected in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are:

- 1 to assist in the preparation, monitoring and review of the St. Helens Local Plan; and
- 2 to contact you, if necessary, regarding the answers given on this form.

The above purposes may require public disclosure of any data received by St. Helens Council on the form, in accordance with the Freedom of Information Act 2000. If you have any concerns regarding the processing of your data, please contact Planning Policy by email to planningpolicy@sthelens.gov.uk or by telephone: 01744 676190

1. Your Contact Details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact.

	Your details	Your agent's details
Title		
Name		
Position		
Organisation		
Address		
Town		
County		
Postcode		
Telephone		
Email address		

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

2. Site Details

Please provide the details of the site you are suggesting. If you are suggesting more than one site, please use a separate form.

Name of the site/ other names it's known by			
Address			
Town			
Postcode			
Ordnance Survey Grid Ref.	Easting:	Northing:	
Approximate size (in hectares)			
What is your interest in the site? (please tick one)	Owner	<input type="radio"/>	Lessee <input type="radio"/>
	Prospective purchaser	<input type="radio"/>	Neighbour <input type="radio"/>
	If other, please state: <input type="radio"/> _____		
Have you attached/enclosed a map showing the site's precise location and detailed boundaries marked in red?*			
Yes <input type="radio"/>			

*For guidance on how to obtain an appropriate map, please see the Guidance Note

3. Proposed Future Use(s)

Please indicate the preferred use that you would like the site to be considered for. Please also indicate any other uses that you would consider acceptable. If you wish the site to be considered for a mix of uses, please tick all boxes that apply.

What is the preferred or alternative use(s) for the site and what is its potential capacity?

	Residential	Employment	Retail	Leisure	If other, please state (e.g. Local Green Space, wildlife site, etc):
Preferred use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> _____
Alternative use(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> _____
Potential capacityunits				
dph*	m ²	m ²	m ²	m ²

*Residential density is measured in dwellings per hectare (dph)

Has any master-planning or design work been done for any of the proposed uses above? If so, it would help us to understand development potential if this was supplied.

Yes ☐ No ☐

4. Site Ownership

Please record the site ownership details. If there are more than three owners, please record the fourth, etc. owner on a separate sheet. If possible, please indicate the extent of individual landholding(s) on the site map.

Do you know who owns the site? If so, please provide details below:				Yes <input type="radio"/>	No <input type="radio"/>
	Owner 1	Owner 2	Owner 3		
Title					
Name					
Address					
Town					

Page 2 of 5

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

County			
Postcode			
Telephone			
Email address			
Has the owner(s) indicated support for the proposed development?			
Yes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Market Interest

Please choose the most appropriate category below to indicate what level of market interest there is in the site.

If you are suggesting the site for development, what is the level market interest (from developers/house builders) does the site have? (please tick all that apply)

Comments

- Site is owned by a developer ☐
- Site is under option to a developer ☐
- Enquiries received ☐
- Site is being marketed ☐
- None ☐
- Not known ☐

6. Site Condition

Please record the current condition of the site. If you have any additional comments, please provide them in Section 9 ("Any other information").

Is the site in active use?		Yes <input type="radio"/>	No <input type="radio"/>
What is the current use(s) of the site?			
If vacant, what was the previous use of the site and which year was it last used?		Year:	
What proportion of the site is made up of buildings?	%	What proportion of the site is open land?	%
How many buildings are on the site?		Approximately which year were the buildings built (if there is a mix of buildings, please state the predominant building type)?	Year:
What proportion of the buildings are currently in use?	%	What proportion of the buildings are current vacant?	%
What proportion of the land is currently in active use?		%	
What proportion is greenfield (i.e. not previously developed)		% (A)*	
What proportion is previously developed and cleared?		% (B)*	
What proportion is previously developed and not cleared (e.g. demolition spoil etc.)		% (C)*	
*A+B+C should add up to 100%			
What is the predominant neighbouring use of the site?			

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

County			
Postcode			
Telephone			
Email address			

Has the owner(s) indicated support for the proposed development?

Yes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Market Interest

Please choose the most appropriate category below to indicate what level of market interest there is in the site.

If you are suggesting the site for development, what is the level market interest (from developers/ house builders) does the site have? (please tick all that apply)

Comments

- | | |
|-------------------------------------|--------------------------|
| Site is owned by a developer | <input type="checkbox"/> |
| Site is under option to a developer | <input type="checkbox"/> |
| Enquiries received | <input type="checkbox"/> |
| Site is being marketed | <input type="checkbox"/> |
| None | <input type="checkbox"/> |
| Not known | <input type="checkbox"/> |

6. Site Condition

Please record the current condition of the site. If you have any additional comments, please provide them in Section 9 ("Any other information").

Is the site in active use?	Yes <input type="radio"/>	No <input type="radio"/>
What is the current use(s) of the site?		
If vacant, what was the previous use of the site and which year was it last used?	Year:	
What proportion of the site is made up of buildings?	%	What proportion of the site is open land? %
How many buildings are on the site?	Approximately which year were the buildings built (if there is a mix of buildings, please state the predominant building type)? Year:	
What proportion of the buildings are currently in use?	%	What proportion of the buildings are current vacant? %
What proportion of the land is currently in active use?	% (A)*	
What proportion is greenfield (i.e. not previously developed)	% (B)*	
What proportion is previously developed and cleared?	% (C)*	
What proportion is previously developed and not cleared (e.g. demolition spoil etc.)	% (C)*	
*A+B+C should add up to 100%		
What is the predominant neighbouring use of the site?		

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Is the site within or directly adjacent to an existing settlement area? Yes ☐ No ☐

7. Constraints to Development

Please tell us about any known constraints that may affect development for the proposed use(s), details of what action is required, how long it will take and what progress has been made. Please use a separate sheet where necessary. If you have undertaken any survey work and/or plans to address the issues, it would be helpful if you can supply this.

Type of constraint	Yes, No or Don't Know	Nature and severity of constraint*	Action needed, timescales and progress	Confirmed by technological study or by service provider?	
				Yes	No
<i>For example: Land contamination</i>	Yes	<i>Hydrocarbons: Minor</i>	<i>Requires remedial action</i>	X	
(a) Land contamination				<input type="radio"/>	<input type="radio"/>
(b) Land stability				<input type="radio"/>	<input type="radio"/>
(c) Mains water supply				<input type="radio"/>	<input type="radio"/>
(d) Mains sewerage				<input type="radio"/>	<input type="radio"/>
(e) Drainage, flood risk				<input type="radio"/>	<input type="radio"/>
(f) Electricity supply				<input type="radio"/>	<input type="radio"/>
(g) Gas supply				<input type="radio"/>	<input type="radio"/>
(h) Telecomms				<input type="radio"/>	<input type="radio"/>
(i) Highways				<input type="radio"/>	<input type="radio"/>
(j) Ownership, leases				<input type="radio"/>	<input type="radio"/>
(k) Ransom strips, covenants				<input type="radio"/>	<input type="radio"/>
(l) Habitats or wildlife				<input type="radio"/>	<input type="radio"/>
(m) If other, please state:				<input type="radio"/>	<input type="radio"/>

8. Site Availability

If proposed for development, please indicate when the site may be available

Excluding planning policy constraints (e.g. Green Belt policy), when do you believe the site could be available for development?



Immediately*

*to be immediately available, a site must be cleared, unless it is for conversion



Not Immediately Available

If not immediately available, please state when it could be available Year:

If the site is not available immediately, please explain why (e.g. the main constraint(s) or delaying factor(s)) and what actions are necessary to remove these:

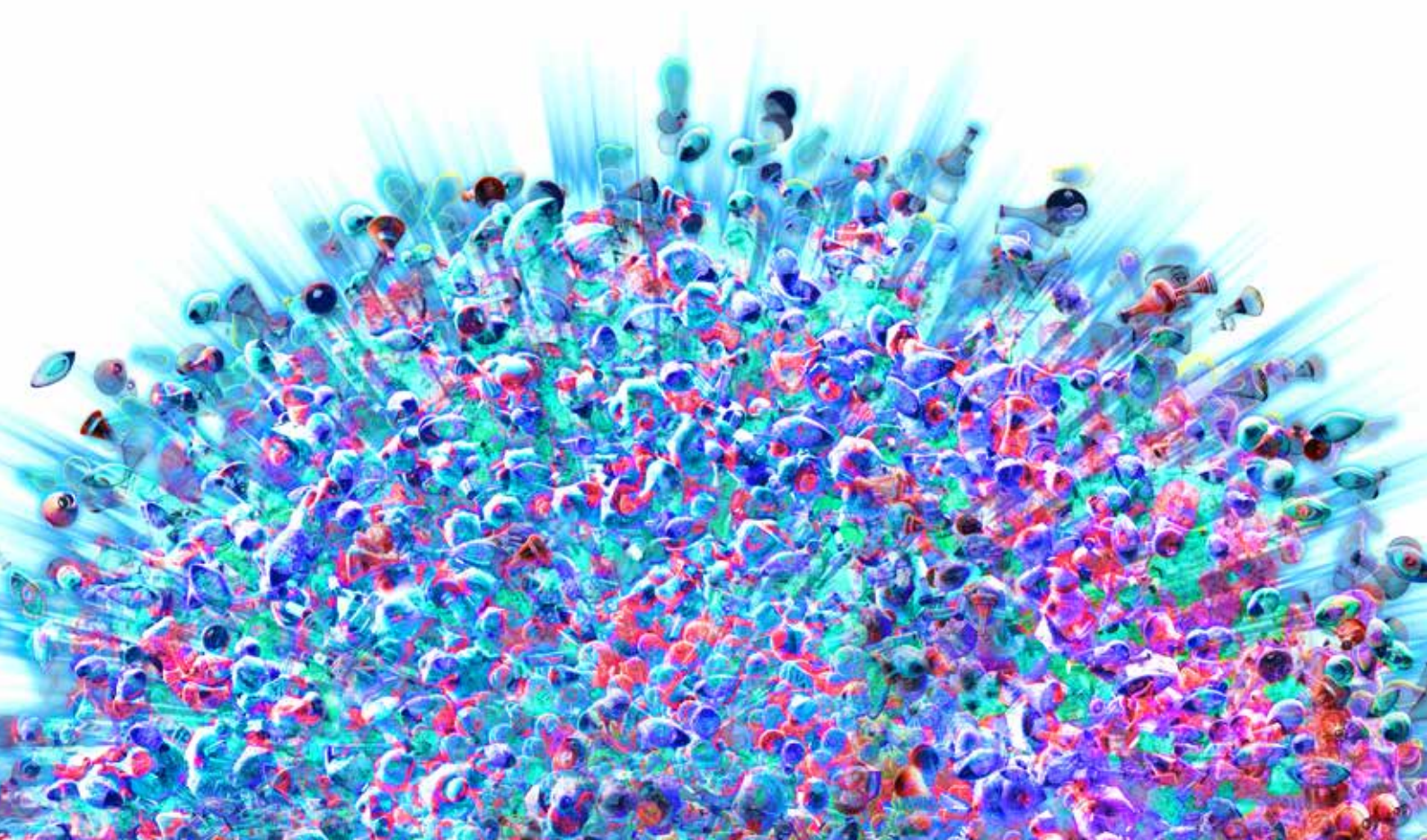
**APPENDIX 12: A SUMMARY OF THE MAIN ISSUES
RAISED BY THE REPRESENTATIONS MADE
PURSUANT TO REGULATION 18, (LOCAL PLAN
PREFERRED OPTIONS REPORT OF CONSULTATION
(REG 18) DECEMBER 2018)**



St. Helens
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

LOCAL PLAN PREFERRED OPTIONS REPORT OF CONSULTATION DECEMBER 2018



1. INTRODUCTION

A statement under Regulation 17 (d) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Local Plan Regulations)

1.1 Report of consultation on the St.Helens Local Plan

- 1.1.1 The preparation of the Local Plan has been informed by a process of continuous and ongoing consultation with the general public and other key stakeholders, both through formal consultation periods and through information and views gathered throughout the process. The process has followed the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 for preparing a Local Plan, and also the St.Helens Revised Statement of Community Involvement, adopted November 2013 (the 2013 SCI).

1.2 What this statement is

- 1.2.1 This statement has been prepared to comply with Regulation 17 (d) of the 2012 Regulations, which requires that at Publication of a Local Plan, a statement setting out the following is prepared:
- (i) which bodies and persons were invited to make representations under regulation 18 [Preparation of a Local Plan];
 - (ii) how those bodies and persons were invited to make such representations;
 - (iii) a summary of the main issues raised by those representations; and
 - (iv) how those main issues have been addressed in the local plan.

1.3 Overview of the St.Helens Local Plan 2020-2035 preparation process

Start of preparation

- 1.3.1 For the Borough of St.Helens, St.Helens Council is the Local Planning Authority (LPA) responsible for preparing the Local Plan. A decision was made by the Council's Cabinet in November 2015 to prepare a new single Local Plan for the Borough of St.Helens. The Local Development Scheme (LDS), which must set out the timescale and content of any Local Plan being prepared, was updated.

Regulation 18 stage: St.Helens Local Plan Scoping: Jan 2016 to Mar 2016

- 1.3.2 Regulation 18 of the 2012 Local Plan Regulations requires the LPA to notify certain *“bodies or persons”* of the subject of the Local Plan the LPA proposes to prepare, and also to invite them to make comments (*“representations”*) to the LPA on what a Local Plan of that subject should contain. The LPA did this at the St.Helens Local Plan Scoping consultation (20 Jan 2016 to 2 Mar 2016). The consultation letters and other material explained that St.Helens Council proposed to prepare a new Local Plan for the Borough of St.Helens, which would *“set how much new development for housing, employment and other uses should take place in the borough, where development should take place and set out policies to be taken account of when assessing planning applications for development”*.

- 1.3.3 The bodies invited to make representations are set out in Appendix 6.

1.4 St.Helens Local Plan 2018-2033 Preferred Options: Dec 2016 to Jan 2017

- 1.4.1 The 2012 Regulations, unlike previous Regulations, do not require any more than a scoping consultation (Regulation 18) and publication of the Local Plan for representations to be made (Regulation 19) on the proposed submission draft version of the Local Plan prior to submission for examination (Regulation 22). However, the LPA decided to invite comments on the Local Plan Preferred Options (LPPO), which was an advanced draft of the Local Plan, setting out various options that had been considered and what, at the time, were the Council's Preferred Options for key issues. This took place from 5 Dec 2016 to 30 Jan 2017.

Scoping consultation and Preferred Options: Which bodies and persons were invited to make representations under regulation 18 [Preparation of a Local Plan] (Regulation 17 (d) (i))

- 1.4.2 The 2012 Regulations state that the *“bodies or persons”* are:
- (a) the *“specific consultation bodies”* set out in the Regulations that the LPA consider *“may have an interest in the subject of the proposed local plan”*;
 - (b) the *“general consultation bodies”* set out in the Regulations that the LPA consider appropriate; and
 - (c) such residents or other persons carrying on business in the LPA's area from which the LPA considers it appropriate to invite representations

- 1.4.3 Please note that these change over time, and the regulations can be changed and updated to add or remove specific and general consultation. The specific consultation bodies set out in the regulations are listed at Appendix 4, and include neighbouring Borough and Parish Councils and Neighbourhood Forums, highways authorities, government agencies and utilities companies. The general consultation bodies definition is at Appendix 5, and includes voluntary organisations and groups representing the interests of different racial, ethnic or national groups, religious groups, disabled persons and businesses in the LPA's area.
- 1.4.4 A full list of the bodies that were consulted at Scoping and at Preferred Options stages are set out at Appendix 6 and 7 – these include the specific consultation bodies and those groups the Council considered to be general consultation bodies. Please note we have endeavoured not to name private individuals who are on our consultation database, but have instead listed the number of those contacted.

Scoping stage: How bodies and persons were invited to make representations (Regulation 17 (d) (ii))

- 1.4.5 A full public consultation was held on the St.Helens Local Plan Scoping Document for a six week period between 20 Jan 2016 and 2 Mar 2016. The consultation asked residents, businesses and other groups which issues are important and what the new Local Plan should contain. This included views on planning policies and which sites - including those in urban areas and the Green Belt - should be developed or protected. The consultation asked 21 questions in relation to the Scoping Document.
- 1.4.6 The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 18 of the 2012 Local Planning Regulations. This included:
- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies;
 - articles and adverts in the local newspapers;
 - posts on Council social media such as twitter and facebook;
 - information pages on the Council website with link from the front page;
 - A4 posters distributed across the Borough; and
 - Offers of meetings made to stakeholders such as specific and general consultees, including St.Helens Chamber.

Scoping stage: main issues raised by representations (Regulation 17 (d) (iii))

- 1.4.7 A total of 212 representations were received from individuals and representatives of organisations, local groups, and businesses during the course of the consultation period. The main issues in these comments have been identified by the LPA in the report St.Helens Local Plan 2018 – 2033 Summary of Representations on St.Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016. The representations have been considered and, where considered appropriate by the LPA, they have been addressed in the proposed submission draft version of the Local Plan (the Local Plan Submission Draft). The report is available at:
- <https://www.sthelens.gov.uk/media/5402/summary-of-representations-on-st-helens-local-plan-scoping-consultation.pdf>
- 1.4.8 The following provides a very high level summary of the main issues raised – please see the above linked report for more detail on the main issues raised.
- 1.4.9 There were no suggestions for a significant change in scope of the Local Plan, or for the key issues to be addressed. There were suggestions that climate change and environmental conservation should be made more central to the Plan. Comments on the Vision included a need for growth but balanced with well-being and health, more emphasis on brownfield land regeneration before use of Green Belt, making sure we accommodate growth needs and also regenerate the town centres.
- 1.4.10 There was concern from the public about the amount of employment land that the evidence indicated would be required, in particular from the Green Belt, and especially at the former Parkside Colliery in Newton-le-Willows, due to the potential adverse impact. The re-use of brownfield land and growth of higher technology businesses were suggested instead. However, other authorities indicated that they could not meet St.Helens employment land needs in their area, and there was support from the development industry for the level of employment land and housing growth proposed. Indeed some suggested it should be substantially higher, and some thought the allocations DPD should proceed (with Green Belt release) instead.
- 1.4.11 There was concern about the impact of potential higher levels of development on infrastructure, in particular the road network.

Scoping stage: How the main issues have been addressed in the local plan (Regulation 17 (d) (iv))

- 1.4.12 The main issues in the comments at Scoping, along with a response on how the Council took account of these in the LPPO, were set out in the report St.Helens Local Plan 2018 – 2033 Summary of Representations on St.Helens Local Plan Scoping Consultation 20 Jan – 2 Mar 2016. The LPPO policies have been further refined with comments received at the LPPO stage to produce the Local Plan Submission Draft. The comments received in relation to the Sustainability Appraisal (SA) Scoping Report Dec 2015 were taken into consideration in preparation of the St.Helens Local Plan Sustainability Appraisal: Interim SA Report Dec 2016. A further stage of the SA has been prepared for the Local Plan Submission Draft.

Local Plan Preferred Options: How bodies and persons were invited to make representations ((Regulation 17 (d) (ii))

- 1.4.13 The LPA invited comments on the LPPO, which was an advanced draft of the Local Plan, setting out various options that had been considered and what at the time, was the Council's Preferred Options for key issues. This took place from 5 Dec 2016 to 30 Jan 2017.
- 1.4.14 The LPPO was accompanied by a draft Policies Map and supporting evidence base, including a draft Green Belt review, employment and housing needs evidence, housing and employment land supply evidence, open space and sport assessments, an interim draft Sustainability Appraisal and Habitats Regulations Assessment, and was informed by other draft documents, including emerging economic viability work. Where considered appropriate, the Council has taken into account comments on these documents.
- 1.4.15 The consultation was carried out in line with the Council's adopted 2013 SCI and in accordance with Regulation 18 of the 2012 Local Planning Regulations. This included:
- email or written notifications sent to those on the Council's consultee database and to specific and general consultation bodies
 - letters sent to properties within 200m of sites proposed to be removed from the Green Belt
 - articles and adverts in the local newspapers, repeated mid-way during the consultation
 - posts on Council social media such as twitter and facebook
 - information pages on the Council website with link from the front page
 - A4 site notices displayed next to sites being proposed for development
 - A4 posters distributed across the Borough

- Offers of meetings made to stakeholders such as specific and general consultees, including St.Helens Chamber.

1.4.16 Council officers hosted 15 daytime, evening and weekend drop-in sessions at locations across the Borough to provide information on the Preferred Options and answer questions from the public. The events were well attended and feedback given to the Council has been incorporated into the summaries below. In addition, Council officers gave presentations to the St.Helens Senior Voice Forum and St.Helens Youth Forum to discuss the Local Plan and obtain feedback from the perspective of those groups.

1.4.17 In November 2017, the Council wrote to all respondents who submitted comments and provided a valid email address or complete postal address to give an update on the Local Plan's progress since the consultation and to inform them of the revised timetable.

Level of response

1.4.18 Consultation on the LPPO ran for an eight week period between 5 Dec 2016 and 30 Jan 2017: following which, a total of 6,048 responses were received by the Council.

1.4.19 Discounting 353 responses that were either blank (i.e., no details given), duplications or additional comments from the same respondent, the total number of responses registered was 5,695 (including joint responses).

1.4.20 Of this number, 130 were classified as 'technical and stakeholder' responses. These included those responses from representatives of statutory consultee organisations (e.g., the Environment Agency), residents' action groups, landowners and planning agents/site promoters, neighbouring authorities, parish councils and other individuals or organisations who provide issue specific and technical input into the plan making process.

1.4.21 The remaining 5,565 responses were predominantly received from residents living in or close to St.Helens Borough. Responses from local businesses were also included. Based on the address information provided, 4,910 were from people living or based in areas within the Borough and 553 from outside. 102 responses did not provide sufficient address details to ascertain this information.

1.4.22 Responses were received and accepted in a number of formats. These included the Council's standard response form (both electronic and paper copy), the Council's online web based form, email and letter. A large number of responses were submitted on dedicated pre-prepared response forms/email produced by residents' action groups including 'Save our Green Belt/Residents Against Florida Farm Development', 'Save Eccleston's Green Belt' and 'Parkside Action Group'.

- 1.4.23 In addition, the Council was made aware of two online petitions generated independently using the ‘change.org’ platform in response to the proposals put forward in the LPPO. These were titled ‘Protect the Green Belt, Agriculture and Wildlife in Rainford, St.Helens, Merseyside’ (receiving 584 online signatories at end of consultation period) and ‘Keep Rainhill and Eccleston Park Green Belt Land’ (receiving 693 online signatories at end of consultation period). Whilst not accepted as formal responses to the consultation, consideration has been given to the comments left by those who signed these online petitions, many of which raise the same issues as recorded in the registered responses.

Local Plan Preferred Options: main issues raised by representations
(Regulation 17 (d) (iii))

- 1.4.24 The main issues raised in the Local Plan Preferred Options are set out in the tables in Section 2. However the following provides a high level summary of the issues raised.
- 1.4.25 The majority of the members of the public who responded were concerned about the scale of potential Green Belt release in the Borough. There were doubts expressed over whether the amount was justified, and the level of need for housing and employment land was also questioned, indicating that St.Helens has had a declining population up until fairly recently.
- 1.4.26 Many people were concerned about the potential adverse impacts of the new development on biodiversity and wildlife, landscape and historic character. The loss of agricultural land needed for food production was also a concern cited by some. Others asked why more brownfield land was not being allocated, or empty homes occupied, rather than Green Belt land being developed.
- 1.4.27 Respondents also mentioned increased traffic congestion and air pollution could arise from the development, and there were concerns raised about the road infrastructure’s ability to cope, especially at congested junctions. There was concern about the need to avoid exacerbating flooding problems in parts of the Borough. Concerns were raised by many respondents about a perceived lack of infrastructure to support existing population, especially education and health, let alone the additional development and population. There was support for providing more affordable housing and housing for elderly persons, including bungalows and retirement housing.

Local Plan Preferred Options: How the main issues have been addressed in the
Local Plan (Regulation 17 (d) (iv))

- 1.4.28 The responses to the main issues raised in the LPPO are set out in the tables in Section 2. However the following provides a high level summary of how the main issues have been addressed.

- 1.4.29 The Council considers that the strategy in the Local Plan Submission Draft (LPSD) addresses the main issues by striking the right balance between meeting housing and employment needs while protecting the most valuable environmental resources and the overall function of the Green Belt, and making provision for adequate infrastructure to be secured at the appropriate time. The Vision, Aims and Objectives have all been revised.
- 1.4.30 The need for large, modern employment land remains strong, although the amount of land identified as being required within the Plan period has been reduced. The LPSD has taken account of revised estimates of housing need, which is lower than at LPPO, reducing the need for housing land compared to the LPPO. Additional brownfield sites have been identified to meet housing needs, and the 2016 draft Green Belt review has been reviewed and revised. Fewer sites are now considered suitable for housing development. The Council is actively exploring how it can increase the re-use of brownfield land both inside and outside of the planning system. Together, this addresses some of the concerns about the amount of land being released from the Green Belt.
- 1.4.31 An Infrastructure Delivery Plan (IDP) has been developed to address infrastructure requirements that are clearly set out in policy. The impact of housing development on the road network, both roads controlled by St.Helens Council and those by Highways England (i.e., the M6 and M62) have been considered through the development of a transport model, and the modelling of proposed sites to identify the degree of impact and potential mitigation. Some sites will not be able to be developed until road infrastructure issues are addressed.

2. **MAIN ISSUES (BY CHAPTER, POLICY AND SITE)**

2.1 **Introduction**

- 2.1.1 This chapter summarises the main issues raised by respondents in relation to each chapter, policy or site identified within the Local Plan Preferred Options (LPPO) document 2016. It also sets out how the issues have been addressed in the Local Plan Submission Draft (LPSD) 2018. The information is presented as a series of tables that cover each part of the LPPO and LPSD documents (i.e., vision, policies, sites) in sequence. Some of the main issues have been submitted by multiple representors and/or by persons whose names have not been attributed¹ within the summaries. Where this is the case, the representor reference number column is left blank. Similarly, some who responded chose to submit their representations anonymously; these, therefore, cannot be specifically attributed.
- 2.1.2 Two reference indexes are set out at the end of the document. These indicate which responses were ‘main issues’ and the Ref.No. assigned to them. There is also a page index that enables location of the responses in the tables that follow.

Contents

Spatial Vision	13
Strategic Aims and Objectives	15
Policy LPA01 - Presumption In Favour of Sustainable Development	16
Policy LPA02 - Spatial Strategy	19
Policy LPA03 - Development Principles	35
Policy LPA04 - A Strong and Sustainable Economy	37
Site EA1 - Omega South Western Extension	44
Site EA2 - Florida Farm North, Slag Lane, Haydock	47
Site EA3 - Land North of Penny Lane, Haydock	49
Site EA4 - Land North East of Junction 23 M6, South of Haydock Racecourse, Haydock	50
Site EA5 - Land South of Penny Lane, Haydock	52
Site EA6 - Land to the West of Haydock Industrial Estate, Haydock	53
Site EA7 - Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock	55
Site EA8 - Parkside East, Newton-Le-Willows	56
Site EA9 - Parkside West, Newton-Le-Willows	61
Site EA10 - Land to the West of Sandwash Close, Rainford	65
Site EA11 - Land at Lea Green Farm West, Thatto Heath	66

¹ In this report, members of the public who made representations are not individually identified, neither are those who put their names to a petition, or commented via social media.

Site EA12 - Gerards Park, Phases 2 and 3, College Street, St.Helens Town Centre	67
Policy LPA04.1 - Strategic Employment Sites	67
Policy LPA05 - Meeting St.Helens Housing Needs	72
Site HA1 - Land Adjoining Ash Grove Farm, Beacon Road, Billinge	86
Site HA2 - Land South of Billinge Road, East of Garswood Road and West of Smock Lane.....	88
Site HA3 - Land at Florida Farm (South of A580), Slag Lane, Blackbrook.....	90
Site HA4 - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor, Bold.....	91
Site HA5 - Land South of Gartons Lane and Former St.Theresa's Social Club, Gartons Lane, Bold.....	93
Site HA6 - Land South of Reginald Road/Bold Road - Northern Section (Phase 1), Bold	95
Site HA7 - Land Between Vista Road and Ashton Road, Newton-Le-Willows.....	96
Site HA8 - Eccleston Park Golf Club, Rainhill Road, Eccleston	98
Site HA09 - Higher Barrowfield Farm, Houghton's Lane, Eccleston	105
Site HA10 - Land South West of M6 J23 Between Vista Road and Lodge Lane, Haydock.....	106
Site HA11 - Land at Moss Bank Farm, Moss Bank Road, Moss Bank	107
Site HA12 - Former Newton Community Hospital (Simms Ward), Bradlegh Road, Newton-Le-Willows	108
Site HA13 - Former Red Bank Community Home, Winwick Road, Newton-Le-Willows	110
Site HA14 - Land South East of Lords Fold, Rainford.....	111
Site HA15 - Land South of Higher Lane and East of Rookery Lane, Rainford.....	114
Site HA16 - Land South of A580 Between Houghtons Lane and Crantock Grove, Windle	117
Policy LPA05.1 - Strategic Housing Sites.....	122
Policy LPA06 - Extent of Green Belt and Safeguarded Land	127
Site ES01 - Omega North Western Extension, Bold	135
Site ES02 - Omega South - Western Extension Phase 2, Land North of Booth's Wood, Bold	136
Site HS01 - Land North of Strange Road and West of Camp Road, Garswood	138
Site HS02 - Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	140
Site HS03 - Bold Forest Garden Suburb: Land South of Reginald Road/Bold.....	141
Site HS04 - Land North of Bell Lane and South-West of Milton Street, Bold	144
Site HS05 - Land to West of Bridge Road and Sweet Brier Court, off Clock Face Road, Bold	145
Site HS06 - Land off Common Road/Swan Road, Newton-Le-Willows	146

Site HS07 - Land Between Ashton Road and M6, Earlestown, Newton-Le-Willows.....	148
Site HS08 - Land South of Burrows Lane, Eccleston.....	149
Site HS09 - Land South of Howards Lane/East of Gillars Lane, Eccleston	150
Site HS10 - Land South of Former Central Works, Bellerophon Way, Haydock	152
Site HS11 - Land South of Station Road, Haydock	152
Site HS12 - Land at Martindale Road, Carr Mill, Moss Bank.....	153
Site HS13 - Land at Old Hey Farm, South of Tyrer Road, Newton-Le-Willows	154
Site HS14 - Land East of Newlands Grange, Newton-Le-Willows.....	156
Site HS15 - Land East of Rob Lane and Rear of Castle Hill, Newton-Le-Willows	158
Site HS16 - Land to Rear of 6 Ashton Road and Elms Farm and West of Rob Lane, Newton-Le-Willows.....	159
Site HS17 - Land West of Winwick Road and South of Wayfarers Drive, Newton-Le-Willows	160
Site HS18 - Land East of Higher Lane/South of Muncaster Drive/at White House Lane, Rainford	161
Site HS19 - Land South of Bushey Lane/Red Delph Farm, Red Delph Lane, Rainford	165
Site HS20 - Land South of Higher Lane and West of Mill Lane, Rainford	168
Site HS21 - Land South of Rookery Lane and East of Pasture Lane, Rainford.....	170
Site HS22 - Land at Hanging Bridge Farm, Elton Head Road, Rainhill.....	173
Site HS23 - Land South of Mill Lane, East of Hall Lane, West of Norlands Lane and North of M62, Rainhill	176
Site HS24 - Land South of Elton Head Road , Thatto Heath.....	180
Policy LPA07 - Transport and Travel	183
Policy LPA08 - Infrastructure and Funding.....	186
Policy LPA09 - Green Infrastructure	190
Policy LPA10 - Development of Strategic Rail Freight Interchange (Parkside).....	193
Policy LPB01 - St.Helens Town Centre and Central Spatial Area (CSA)	196
Policy LPB02 - Earlestown town Centre	198
Policy LPC01 - Housing Mix	199
Policy LPC02 - Affordable Housing Provision.....	202
Policy LPC03 - Gypsies, Travellers and Travelling Showpeople	207
Policy LPC04 - Retail and town Centres	207
Policy LPC05 - Open Space and Outdoor Sports Facilities.....	209
Policy LPC06 - Biodiversity and Geological Conservation	210
Policy LPC07 - Greenways.....	212
Policy LPC08 - Ecological Network.....	212

Policy LPC09 - Landscape Protection and Enhancement	213
Policy LPC10 - Trees and Woodland	213
Policy LPC11 - Historic Environment	215
Policy LPC12 - Flood Risk and Water Management	216
Policy LPC13 - Low Carbon and Renewable Energy Development	220
Policy LPC14 - Minerals	221
Policy LPC15 - Waste	222
Policy LPD01 - Ensuring Quality Development in St.Helens	222
Policy LPD02 - Design and Layout of New Housing	224
Policy LPD03 - Open Space and Residential Development	225
Policy LPD04 - Householder Developments	226
Policy LPD05 - Extension, Alteration or Replacement of Dwellings or Conversion to Dwellings In the Green Belt	226
Policy LPD06 - Development In Prominent Gateway Locations	227
Policy LPD07 - Digital Communications	228
Policy LPD08 - Advertisements	228
Policy LPD09 - Air Quality	228
Policy LPD10 - Hot Food Takeaways	230
Policy LPD11 - Health and Wellbeing	230
Draft Policies Map	231

Appendices

Appendix 1

Reference Index 1: List of Respondents Contributing to LPPO ‘Main Issues’ (and Ref. No.)	233
--	-----

Appendix 2

Reference Index 2: Location of LPPO ‘Main Issue’ Responses by Ref. No.	237
---	-----

Appendix 3

Methods of Consultation Employed at Various Stages	241
--	-----

Appendix 4

Specific Consultation Bodies as Set out in the 2012 Local Plan Regulations.....	243
---	-----

Appendix 5

General Consultation Bodies as set out in the 2012 Local Plan Regulations	245
---	-----

Appendix 6

List of Consultees Invited to Make Representations at Scoping Stage.....	247
--	-----

Appendix 7

List of Consultees Invited to Make Representations at Preferred Options Stage.....	257
--	-----

CHAPTER 3 - SPATIAL VISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO801, Seneley Green PC	Cannot support the loss of Green Belt, additional homes within the rural areas would not support the Vision.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Spatial Vision as it reflects the issues facing St.Helens and encourages sustainable development, renewal and opportunity, and seeks to unlock the growth potential of St.Helens.	Support noted.
E1510, Homes & Communities Agency	Support for the continued urban regeneration and sustainable expansion of St.Helens as identified within the Spatial Vision that St.Helens is an attractive place to live, work, visit and invest in, with healthy, safe and inclusive communities and a quality and accessible built and natural environment.	Support noted.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Supports the Spatial Vision but consider it could be improved upon by also making clear that if the economic aspirations of the Borough are to be achieved, family homes of a high enough quality must be provided to help attract and retain a sufficiently skilled workforce within the Borough.	The LPSD addresses this by including an allowance for employment growth in the calculation of Objectively Assessed Need (OAN) for housing. This matter is covered in Policy LPA05.

CHAPTER 3 - SPATIAL VISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Suggest that the first sentence should be amended to <i>"High quality employment land has been provided to meet modern employment needs to 2033 and beyond..."</i> Consideration should also be given to the inclusion of a specific reference in the vision to <i>"achieving an appropriate Green Belt review and defining a revised long term defensible Green Belt boundary"</i> to achieve the growth aims. Specific reference should also be made to the logistics sector in meeting a specific part of the modern employment needs in the Borough.	The vision has been revised in the LPSD. The need to provide for employment needs beyond the end of the Plan period is acknowledged but is adequately covered elsewhere in the Plan. It is also not necessary for the vision to refer specifically to the Green Belt review as this is simply the mechanism by which 'sustainable growth' (which is referred to in the vision) will be achieved. The needs of the logistics sector are adequately addressed in Policies LPA02, LPA04 and LPA06.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd	The Spatial Vision should strongly reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the LCR and North West in general (such as the Superport, Airport City, and major upgrades to the M6 and M60 to make them Smart Motorways.	The positive impact of these initiatives and infrastructure projects is acknowledged. However, it is not considered necessary to refer to them specifically in the vision as they are adequately covered elsewhere (in the supporting text to Policies LPA02 and 04).
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Core Strategy Spatial Vision identified Haydock Industrial Estate and the M62 Link Road Corridor as the priority areas for economic development. The Vision and Strategic Aims should identify Haydock as a priority location because of its proximity to the strategic road network, the existing employers in the vicinity and the availability of local labour. The Spatial Vision should identify sufficient employment land in sustainable locations.	Haydock is an important location for employment in the Borough, is identified as one of its Key Settlements in the Plan (Diagram 4.1) and is referenced in Policy LPA04. 1: Strategic Employment Sites. It is considered that to include it as a named location in the Spatial Vision would give it its role undue prominence.

CHAPTER 3 - STRATEGIC AIMS AND OBJECTIVES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Aim 1 – should recognise the appropriate contribution that sustainable greenfield sites can make to regeneration and economic development of the Borough.	Comment noted. The LPSD addresses this under Policy LPA02 (no.4). This provides a framework for the Plan to release land from the Green Belt to enable needs for housing and employment development to be met in full over the plan period.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Aim 5 – a reference to capitalise on the growth sectors of SuperPort and large scale logistics sector should be incorporated to reflect the aims of the economic strategies that are referred to in the Aim.	Comment noted. The LPSD Strategic Aim 1 and Objective 1.1 and 5/5.1 and the Spatial vision support economic growth and regeneration in sustainable locations in St.Helens.
E1543, Barton Willmore on behalf of Jones Homes (North West) Ltd.	Supportive of the proposed Strategic Aims & Objectives, however Objective 1.1 should give priority to development of derelict and vacant sites. Objective 4.1 should be amended to include reference to market and affordable homes.	Support noted. The relevant part of Strategic Objective 1.1 (which is numbered 1.3 in the LPSD) has been changed to refer to Previously Developed Land instead of derelict and vacant sites. The reference in Objective 4.1 to providing for a “sufficient number and range of new dwellings” is considered to encompass market and affordable housing.
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	Strategic Aim 4, in particular the use of the word “sufficient”, is lacking in ambition and should be reworded to reflect the positive aspirations of the [2012] NPPF.	Use of the word ‘sufficient’ is retained in LPSD Strategic Aim 4. This is a robust approach and consistent with national policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Generally supportive, however, Strategic Objective 1.1. Objective 4 Reference to 'local needs' should be reviewed as it is clear that new homes are also needed to deliver the Boroughs economic ambitions.	Support noted. The revised Strategic Objective 4.1 of the LPSD addresses this issue by stating that land should be identified for “...a sufficient number and range of new dwellings”.

CHAPTER 3 - STRATEGIC AIMS AND OBJECTIVES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1560, Pegasus Group on behalf of Redrow Homes North West	Strategic Aim 1.1 - uses the word 'priority', however the NPPF seeks to significantly boost housing supply through a range of site types both greenfield and brownfield. Strategic Objectives 4.1 & 5.1 refer to 'sufficient' housing and employment land, which suggested the Council is only just meeting its needs, the NPPF requires plans to be 'positively prepared' and to 'boost significantly' the housing supply. As such we recommend amending the wording.	Comment noted. The relevant part of Strategic Aim 1 has now been amended to refer to efficient use of Previously Developed Land. It has been established (see the supporting text to the draft local plan Policy LPA02) that St.Helens does not need to accommodate any housing needs arising in any neighbouring local authority area. The LPSD has been positively prepared. It seeks to meet St.Helens objectively assessed needs, and is informed by cooperation with neighbouring authorities.
E1488, Historic England	Strategic Aims and Objectives could be improved upon by incorporating the wording of Objective 8 of the 'Local Plan Sustainability Appraisal: SA Report December 2016/2018'. This wording is "to protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment"	This matter is addressed in Strategic Objective 6.2 of the LPSD, which is to "... safeguard the quality of the environment by protecting and enhancing local character and distinctiveness, the historic environment, biodiversity and geodiversity." Policy LPC11 also addresses this matter.

POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Promoting healthy communities etc. through development will be difficult as people are so reliant on cars and additional growth will only add to the pollution problems.	The Vision, Strategic Objective 3.1 and Policies LPA02, LPA07 and LPA09 collectively support sustainable modes of transport including walking and cycling. They promote healthy communities through improved access to formal and informal green infrastructure assets to reduce carbon emissions.

POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Poor transport links and lack of local services make it extremely difficult to encourage new residents to cycle and as such residents will be reliant on cars thereby failing to meet the aim of minimising carbon emissions	The Vision, Strategic Objective 3.1 and Policies LPA02, LPA07 and LPA09 collectively support sustainable modes of transport including walking and cycling. The approach of the LPSD will therefore support sustainable modes of transport including cycling and walking which will mitigate carbon emissions.
E1467, Cllrs Glover, Neal & Baines	Residents have concerns in regards to pollution by the additional cars.	LPSD Policy LPD09 addresses this issue and requires development proposals to demonstrate that they will not “...having regard to established local and national standards, lead to an unacceptable decline in air quality in any area.”
E1470, Cllr Haw	Eccleston residents disagree that the Plan is sustainable and that development has been divided equally around the Borough.	Sustainable development principles are addressed in the Vision and the Strategic Aims and Objectives. The distribution of development is addressed in Policy LPA02, which focusses development into sustainable locations (including a focus on the Key Settlements) across St.Helens.
E1470, Cllr Haw	In regards to climate change the addition of 2,477 new homes in Eccleston will exacerbate the flooding issues.	Policy LPC12 seeks to ensure that new development will not cause an unacceptable risk of flooding and sets out the requirements for developers to demonstrate how flood risk will be addressed.
E1495, CPRE	The policy should define what is meant by sustainable development and include a commitment to air quality.	Sustainable development is defined in the NPPF Para.11 and the LPSD does not duplicate this. Air quality issues are addressed in Policy LPD09.
E1481, Parkside Regeneration LLP	The Plan identifies Key settlements where development is focussed ensuring sustainable development.	Support noted.

POLICY LPA01 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Support the policy but it should be amended to reflect para 14 of the NPPF, by deleting the following text from Criterion 3 <i>"material considerations indicate otherwise – taking into account whether"</i> .	The wording of Policy LPA01 has been revised and is consistent with the relevant paragraph (11) of the revised NPPF (July 2018).
E1499, Natural England	Support the preferred approach of this policy.	Support noted.
E1503, Kingsland Strategic Estates Ltd.	Policy is in keeping with the NPPF. Criterion 2 part II will be an important part of a successful Plan.	Support noted.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Clarification is required between Policy LPA01 and Policy LPA03, to ensure that proposals that comply with presumption in favour of sustainable development are not then refused on the development principles contained within Policy LPA03.	LPSD Policies LPA01 and LPA03 have been updated. The requirements of Policy LPA03 are reasonable and justified having regard to relevant national policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Support the approach to include a buffer in determining the scale of Green Belt release, however, in line with LPEG recommendations the buffer should be applied to the overall housing requirement rather than simply the scale of the land supply 'gap'.	Support noted. The approach to housing land supply in Policy LPA05 (and explained in its supporting text) contains an appropriate level of contingency in the supply as a whole, including sites being delivered from the current urban areas and from areas released from the Green Belt.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Policy text needs to be amended to be more positively prepared. Part 1. should have additional texts, which states: <i>"This will take into account the need expressed in the NPPF to 'boost significantly' the supply of housing."</i>	LPSD Policy LPA01 has been revised and fully aligns with the revised NPPF(July 2018). It is not necessary to include the wording suggested in this Policy as the underlying point is addressed elsewhere in the Plan.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1482, Spawforths on behalf of Network Space	Object to the word 'comparison' – this should be deleted in order for the Plan to be found sound.	Policy LPA02 has been re-worded and does not include this word.
E0224, Rainhill Civic Society	The concept of “Safeguarding” land is misleading, as the NPPF states it should be used “ <i>where appropriate</i> ”. This could lead to unrestricted sprawl especially as the Garden Village at Halshead is to go ahead, which makes the case to preserve the Green Belt in St.Helens South even stronger.	The inclusion of safeguarded land accords with paragraph 139 of the NPPF(2018). The inclusion of safeguarded land will help ensure that the new Green Belt boundary endures for the long term in line with national policy.
E1491, NFU	Do not support the significant loss of productive acres of land. Farmland and farming activities should take priority in the Green Belt.	The LPSD proposes a reduced amount of development on agricultural land, as a result of the reduced housing requirement. The remaining sites that have been selected as development locations are those that are well-related to the existing built-up areas. Whilst some loss of agricultural land would still occur, this is justified by other sustainability factors. The St.Helens Green Belt Review 2018 sets out how the sites to be removed from the Green Belt have been selected.
E1495, CPRE	Object to Criterion 4 as exceptional circumstances have yet to be met so the Plan cannot remove land from the GB.	The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. There is insufficient land in the Borough’s urban areas (and in those of neighbouring districts) to provide for future development land needs and therefore some sites need to be removed from the Green Belt to accommodate new development. The LPSD proposes a reduction in the amount of Green Belt release due to the reduction in the annual housing requirement from 570 to 486 dwellings per annum.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Strongly oppose the proposals to release 1,187ha of land from the GB.	See above. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1495, CPRE	Opposed to development particularly at Rainford Junction; Crank; Bold and Kings Moss due to the harm it would cause the GB.	See above. The loss of Green Belt land in some locations (e.g., Rainford Junction) has been reduced compared to that proposed at Preferred Options stage.
E1250, Rainford Action Group	The lack of Brownfield Sites is not an “ <i>exceptional circumstance</i> ” to release GB land.	See above. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1453, Culcheth and Glazenbury PC	Object to GB being removed and doubt the Council can control the sequential use of land in regards to Safeguarded Land.	The Plan seeks to identify sufficient land for housing and employment in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. Policy LPA06 of the LPSD confirms that planning permission should not be granted for development on safeguarded land unless it is allocated for development in a future Local Plan.
E1458, Winwick PC	too much development is being proposed near the Winwick area. The openness around Winwick will be gone if Green Belt release goes ahead.	The LPSD seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. Whilst the loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage, some sites close to Winwick are still to be released. The reasons for selecting specific sites are set out in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	The impact on local highways infrastructure will be unacceptable.	The impact on local highways infrastructure is covered by relevant Policies (e.g., LPA07 and LPA10).

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Reliance on Brownfield land is not appropriate. Object to lowering the threshold for developers of brownfield sites. to assume developers on greenfield sites have less constraints is not necessarily correct.	Policy LPA02, clause 3 has been revised but reaffirms that development on previously developed land in Key Settlements will be encouraged by setting lower thresholds for developer contributions on such sites. This is fully justified by the findings of the Economic Viability Assessment.
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, heath facilities, public transport, retail outlets. The sites identified consist of Grade 1 agricultural land, which is a high source of employment in the village.	The St.Helens Infrastructure Delivery Plan 2018 sets out the key infrastructure requirements necessary for development to take place. LPSD Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements. Site HA14 is no longer proposed to be allocated for housing.
E1456, Rainford PC	Site HA21 is publicly accessible parkland and should be protected as such, as an alternative Red Bank Farm should be included to increase the numbers.	Comment noted
E1470, Cllr Haw	The amount of land proposed for development in Eccleston is unacceptable, brownfield sites must be developed first. There are also 3,500 empty homes in the Borough the Council should accelerate its 'Empty Property Strategy'.	Council tax data confirms that in October 2017, 936 dwellings in St.Helens Borough met the Government criteria for being Long Term vacant. Whilst the Council pro-actively promotes the re-use of vacant dwellings via its Empty Homes Strategy it cannot control the numbers of dwellings which become vacant. It therefore cannot assume that net trends in vacancies will contribute to meeting housing needs. LPSD Policy LPA02 confirms that "re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites."

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Lander Associates	Employment allocated in close proximity to the M6 and M62 will encourage long-distance commuting.	LPSD employment allocations are supported by the Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (October 2017). These studies indicate that sites close to the M6 and M62 motorways will play a critical role in the North West large-scale logistics and distribution sector. The policies of the LPSD will encourage use of sustainable transport links to mitigate long distance commuting.
E1486, McGinn MP	Resident constituents have expressed concern over how much GB is being released. Have the Council considered a step housing target with identified phases? Disappointed that the Government funding for brownfield sites has been removed.	The Plan seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
LA399, Newton Resident & Friends Association	Newton and Haydock will be taking a disproportionate amount of employment development compared to the rest of the Borough.	Housing and employment sites have been identified by assessing a number of balancing factors including sustainability of the locations. The Plan does not propose an even distribution of sites across the Borough. The sites identified for development have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
E1461, Croft PC	The protection of GB is especially important in light of the planned route of HS2 through the region. The proposal would see considerable urban sprawl with the space between existing small, fairly rural communities being eroded.	Comment noted. The LPSD is aligned with the NPPF(2018) especially para.139. Collectively, the inclusion of the principles of Green Belt from the NPPF into Policy LPA02 will help to prevent the feared "sprawl" and help to strengthen the protection for the remainder of the Green Belt.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1548, Nexus Planning on behalf of NHS Property Services	Insufficient land has been allocated in Newton-le-Willows in comparison to the amount of employment identified.	The employment site allocations set out in Policy LPA04 are suitable to meet needs set out in the Employment Land Needs Study (ELNS) 2015 and its Addendum Report (October 2017). The location of employment and housing sites has also been informed by the Green Belt Review 2018.
E1470, Cllr Haw	More brownfield land needs to be built on first before GB land is removed; however there is no Brownfield register.	The LPSD Policy LPA02 states that <i>“re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites”</i> . The Council has taken account of the sites in its published Brownfield Register in finalising the LPSD.
E1569, Nexus Planning on behalf of BXB Ltd	Concern that the evidence base, specifically the draft Green Belt Review 2016, does not fully consider the impact that Bold Heath has upon the character and purpose of the Green Belt in that particular location.)	The Green Belt Review (2018) fully takes account of the impact of developing sites on the character and purposes of Green Belt areas. Its methodology also takes relevant policies in the NPPF (2018) into account.
E1468, Cllr Long	Allocate more land as greenspace in the local plans or let developers build on sites regardless of planning aspirations.	The LPSD includes adequate policy provision for open spaces across the Borough. Policy LPCC05 confirms that the Council will seek to ensure that the Borough's network of open spaces is protected, managed, enhanced and where appropriate expanded. Policies LPC06, LPC07, LPC09 and LPC10 also support the protection, provision and enhancement of greenspaces.
E1465, Y. Fovargue MP for Makerfield	Without GB, Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed.	The LPSD seeks to identify sufficient land for housing and employment, in suitable locations that can contribute to sustainable development. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
FP0260 Billinge PC	Suggest that more land is allocated in Garswood, where there seems to be little objection.	The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are in sustainable locations and those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs
E1560, Pegasus Group on behalf of Redrow Homes North West	Part 3. - need a range of brownfield and greenfield sites to guarantee delivery and not prioritise one over the other.	Policy LPA02 confirms that re-use of brownfield land in Key Settlements will remain a key priority. This approach is fully in line with national policy.
E0442, Billinge Chapel End PC	Concerned that the current approach to Green Belt release will undermine the purpose of preventing urban sprawl. Housing Allocation HA1 is close to two neighbouring authorities (Wigan, West Lancashire).	The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. Site HA1 has been removed and will remain in the Green Belt.
FP0456, Residents Against The Development Of Green Belt – Rainhill	Rainhill has a number of constraints including highways, education facilities, poor pollution levels and the further removal of GB will remove the areas of CO2 absorption.	The sites chosen for Green Belt release and safeguarding have been objectively assessed such that they: are adjacent to existing built-up areas; relate well to the key settlements so that the availability of local services and facilities is more likely; reflect the demand for additional housing in areas that are accessible to jobs; and result in sustainable development. The details of the site assessments, including anticipated impacts on the provision of local services, are contained in the Green Belt Review 2018.
FP0717, Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.	The Plan should be amended and priority should be given to non-GB sites and support the delivery of new housing, employment development on such sites.	LPSD Policy LPA02 states that “re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites.” The Council took account of the Brownfield Register when identifying sites.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0228, Rainford Heritage Society	Allocations in Rainford will bring us closer to neighbouring parishes which will intrude into our heritage	LPSD Policy LPC11 seeks to protect the historic environment. A number of areas proposed for removal from the Green Belt in the LPPO would now stay in the Green Belt.
LPPO588, Rainford Action Group.	Object to development in Rainford due to lack of affordability, pressure on drainage system, blue light services, and the decimation of GB, increase in anti-social behaviour, all for a declining population.	Comment noted. The level of development proposed in Rainford has been reduced compared to that proposed in the LPPO. Infrastructure issues are addressed in Policy LPA08.
LPPO534, Cllr Mitchell (Burton & Winwick Ward).	Removal of GB around Winwick will have a detrimental impact on Winwick residents including outlook and traffic infrastructure.	Impacts from development in this area will be addressed in relevant policies including Policies LPA07 'Transport and Travel', LPA08 'Infrastructure Delivery and Funding' and LPA10 'Parkside East'.
E1427, Residents of French Fields	A disproportionate amount Green Belt Land is being released in the south of the Borough for housing despite the Bold Forest Park AAP and Mersey Forest initiatives.	The distribution of sites to be removed from the Green Belt has been guided by the Green Belt Review 2018. The levels of development proposed in Bold are not inconsistent with the Bold Forest AAP. Policy LPA05.1 confirms that the strategic housing site proposed at Bold Forest Garden Suburb will be subject to a master planning exercise which must (amongst other things) address Green Infrastructure issues.
E1446, Knowsley Council	It will be extremely challenging to demonstrate adequate ground for removing a further 15 years' worth of housing sites from the GB when there is no certainty of future demands and given the Plan was published before the SHELMA.	The LPSD was informed by the draft Liverpool City Region SHELMA, published in 2017, which assessed housing and employment needs across the whole City Region and West Lancashire but excluding Warrington. Its proposals for safeguarded land (to meet post Plan period development needs) are fully in line with relevant policy in the NPPF.
E1400, Parish Councillor Trisha Long	The concept of releasing more GB land for development runs counter to the concept of localism.	The concept and methodology used for assessing the release of Green Belt for development is aligned with the national policies including the NPPF.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO588, RAG – Rainford Action Group	Animal and natural habitats would be ruined, we have a right to protect.	LPSD Policy LPC06 supports the protection of biodiversity including wildlife.
LB0001, Save our Green Belt & Residents against Florida Farm Development	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used.	LPSD Policy LPA07 addresses the issue of transport impacts from development. It states that “ <i>all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement</i> ”. Air pollution and noise are also covered in relevant Plan policies (e.g., LPD01 and LPD09).
LPPO801, Seneley Green PC	Cannot support the current proposals for release of GB as they would be to the detriment of the character of the areas.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1489, Home Builders Federation	Support the lowering of developer contributions to encourage development in Criterion 3.	Support noted
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Broadly supportive but concern with reference to the majority of housing to be developed on brownfield land.	Support noted. The emphasis on securing efficient use of brownfield land accords with national policy.
	Support the focus on delivering new development on previously developed land.	Support noted
E1489, Home Builders Federation	Support the approach of supplying a further 15 years’ worth of land.	Support noted

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Landor Associates	Green Belt land needs to be released. There has been virtually no housing development in Rainford over last 20 years and the current amount of housing allocated in Rainford does not address the "backlog".	Support noted. The LPSD Policy LPA02 sets out how development will be distributed across the Borough up to 2035 and beyond.
E1458, Winwick PC	Support the Spatial Strategy and Vision but request neighbouring residents outside the Borough are not treated any differently.	Support noted. The LPSD covers St.Helens Borough. The Council has cooperated extensively with neighbouring local planning authorities in preparing the Plan. The Plan policies do not treat residents of neighbouring districts any differently for example in terms of protection of residential amenity.
E1491, NFU	Welcome the inclusion of rural economic diversification in the Green Belt.	Support noted
E1460, Cllr Glover	Support as attractive areas for housing and manufacture have been selected.	Support noted
E1521, Michael Sparks associates on behalf of Canmoor Developments Ltd.	Support the release of land for additional jobs for the Borough, as currently there is insufficient land allocated for employment.	Support noted.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Agree that Haydock; Newton-le-Willows and Earlestown should be amongst the key settlements.	Support noted
FP0717, Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.	Support criteria 1, 2 and 5.	Support noted

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support the inclusion of Garswood as a Key Settlement	Support noted
E1447, West Lancashire Council	Broadly supportive, however greater clarity is required to ensure that the proposed spatial strategy is robust and complements the spatial strategies of neighbouring boroughs, including West Lancashire.	Support noted. LPSD Policy LPA02 supporting text recognises the importance of effective cooperation with nearby districts in the Liverpool and Greater Manchester City Regions, and in Warrington and West Lancashire.
E1445, Sefton Council	Support the overall strategy	Support noted
E1466, Cllr Sims	Generally supportive but local residents object to the amount of development proposed for Earlestown.	Support noted. The level of Green Belt release proposed is Earlestown has reduced compared to LPO stage.
E1467, Cllrs Glover, Neal & Baines	Agree with the ambitious aims and growth for the Borough but local Windle residents have concerns with the allocated site HA16.	Support noted. Site HA16 is now proposed for safeguarding (to meet post 2035 housing needs) as opposed to being allocated for development before then.
E1468, Cllr Long	Support and residents are clear that this is a Borough-wide Plan.	Support noted
E1469, Cllrs Banks, Bond & Burns	The Plan sets out growth ambitions in a sustainable way.	Support noted
E1486, McGinn MP	Welcome the Vision and ambition to win investment and create employment in the Borough	Support noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Agree with general approach, however the trust is not convinced that some of the sites being put forward can be developed with an 'acceptable impact on the environment'.	Support noted. LPSD Policy LPC06 supports the protection of biodiversity including wildlife. Impacts upon the environment have been taken into account in the methodology of the St.Helens Green Belt Review, which has informed the selection of sites to be removed from the Green Belt.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Support the spatial strategy and the identification of the St.Helens Core Area and Newton-le-Willows as key settlements.	Support noted
E1555, Helen Howie on behalf of Wallace Land Investments	Support Rainhill as a Key settlement within the Borough.	Support noted
E1481, Parkside Regeneration LLP	The demand/deficit for new employment floorspace and housing combined with the historic and tightly drawn GB/settlement boundaries justifies the requirement to release land from the GB to meet identified needs.	Support noted.
E1583, Warrington Borough Council	Supportive of St.Helens' overall growth ambitions and its commitment to meet its own housing and employment needs.	Support noted
E1575, DPP Planning on behalf of Tesco Stores Ltd.	Generally support the spatial strategy set out, however, when choosing which GB sites to allocate for development, preference should be given to those sites which will assist with the redevelopment of land adjacent to brownfield sites within the urban areas that are in need of regeneration.	Support noted
E1479, Edward Landor Associates	Green Belt release is necessary in order to meet FOAHN housing target. The supply of brownfield is limited. The extent of land to be removed from the GB is not significant in the context of the proportion of GB to be retained in the Plan.	The Council's Green Belt Review (2018) sets out a robust approach and methodology for the release of Green Belt for housing and employment development.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Support the release of GB and the Council acknowledges other authorities in the same housing market have no spare suitable brownfield land to meet St.Helens' needs.	Support noted
EFPO260, Billinge PC	We need more houses and business.	LPSD Policies LPA04, LPA04.1 and LPA05 support the delivery of housing and employment in the Borough.
LLPO538, Torus	Support providing the Brownfield sites are considered and dismissed first.	Support noted. Whilst the re-use of brownfield land remains a key priority this will not be sufficient on its own to meet the Borough's development needs.
E1496, Highways England	Broadly supportive but site-specific requirements are currently very high, with a lack of detail regarding sustainable and active transport provision. Many employment sites are lacking existing opportunities for sustainable and active travel.	Support noted. The housing and employment allocations proposed in the LPSD have been identified having regard to the findings of the St.Helens Local Plan Transport Impact Assessment 2018. Policies LPA07 and LPA05.1 set out requirements for sustainable and active travel provision, linked to the delivery of the employment sites. Sustainable and active travel are also addressed in the St.Helens Infrastructure Delivery Plan 2018.
E1496, Highways England.	Allocated sites should include detailed measures in order to maximise the potential for sustainable and active travel opportunities, including off-site works as required.	LPSD Policies LPA04.1, LPA05.1 and LPA 07 set out detailed measures to achieve sustainable transport and active travel.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Council must ensure that Policy LPA06 is fully consistent with Policy LPA02 and full regard is had to the implications of the SHELMA.	LPSD Policy LPA06 is consistent with Policy LPA02. The LPSD was informed by the draft Liverpool City Region SHELMA, published in 2017.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSP
E1549, Persimmon Homes North West	The quantum of future housing requirements for Billinge and Seneley Green is disproportionately low and fails to reflect population size. It is recommended that the redistribution of the Borough's housing supply should be amended to align with the settlement size of these areas.)	Housing and employment sites have been identified by assessing a number of factors including the contribution that sites make to the purposes of the Green Belt, accessibility by sustainable modes of transport and other deliverability issues. The Plan does not propose that there is an even distribution of sites across the Borough, rather that the sites that are to be identified for development are those that have been objectively assessed as being the best that are available to meet the Plan's housing and employment land needs.
E1564, De Pol Associates on behalf of Metacre Ltd.	Agree with the principle of releasing of GB land however it is considered that additional land off Fleet Lane, Parr should be released.	Support noted. The selection of sites for release from the GB has been guided by the Green Belt Review 2018. No additional land is proposed to be released off Fleet Lane.
E1559, DLP Planning on behalf of Mr P. Reynolds	Site HS05 is capable of coming forward within this Plan period. Site GBS_156 should be removed from GB and allocated as Safeguarded Land. Allocation of both these sites would widen the choice of housing sites available.	Following the re-appraisal of sites in the Green Belt Review 2018, it has been determined that LPO site HS05 will remain in the Green Belt. This is following the reduction in the assessed level of housing need from 570 to 486 dwellings per annum, which impacts on the amount of land required. This approach is in line with the revised methodology for the Green Belt Review.
E1548, NHS Property Services	Support subject to the revision of the proposed development boundary of site HA12.	Following the re-appraisal of sites in the Green Belt Review 2018, it has been determined that LPO site HA12 will remain in the Green Belt. This is following the reduction in the assessed level of housing need from 570 to 486 dwellings per annum, which impacts on the amount of land required. This approach is in line with the revised methodology for the Green Belt Review.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1557, Peter Brett Associates LLP on behalf of Smith Property Developments Ltd. and Interland UK Ltd.	Endorse the release of land at Parkside West from GB and consider that land at Newton Park Farm (situated within the EA9 site) should be allocated for residential development.	Comment noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E1518, Cass Associates on behalf of Redrow Homes Ltd.	Generally supportive but object to the Policies Map as it does not exclude the land at Junction Road/Stanley Avenue from the Green Belt.	Comment noted. The LPSD proposes to keep the land at Junction Road/Stanley Avenue (Rainford) in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1472, Edward Lander Associates on behalf of Z. Mallik	More smaller sites should be included in the south of the Borough to address the current imbalance in the distribution of sites likely to come forward for development. There is an opportunity to identify sites in " <i>other district settlements</i> " such as Bold Heath, rear of Holly House.	The St.Helens Brownfield Register 2017 identifies 62 sites, with a combined capacity of 852 dwellings, which are no larger than one hectare in size. Further small sites are likely to come forward as windfall sites. There is no evidenced need for a greater supply of small sites to be allocated in the south of the Borough.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England.	Part 6 should be more explicit in terms of what constitutes a lack of housing supply.	Comment noted. Policy LPA05 confirms that housing delivery will be monitored in accordance with the national Housing Delivery Test. In accordance with national policy, the LPSD will seek to ensure there is a 5 year deliverable supply of housing sites at all times.
E1575, DPP Planning on behalf of Tesco Stores Ltd.	Where Green Belt releases are required, preference should be given to land which is adjacent to, and can form part of, the redevelopment of brownfield sites within the urban area.	Comment noted. Any specific regeneration benefits likely to arise from the development of sites has been taken into account by the Council in its site selection process.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1558, Savills (UK) Ltd. on behalf of the Knowsley Estate	Fully support the release of land from GB but request the identification of Site HS21 be allocated for housing in this Plan period, rather than identified as 'Safeguarded Land'.	Comment noted. The LPSD proposes to keep LPPO site HS21 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E0224, Rainhill Civic Society	Need to refer to Rainhill's transport links via the railway and M62 in para 4.5.	Comment noted. No change made.
E1555, Helen Howie on behalf of Wallace Land Investments	Support land being removed from GB and classed as Safeguarded Land, to meet two plan periods. However site HS23 should come forward now as an allocation to meet the housing deficit in the Borough.	Comment noted. The LPSD proposes to keep LPPO site HS23 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1494, Merseytravel	Development should be sited in accessible locations.	Comment noted. LPSD Policies LPA02(2) and LPA07(1) require development to be sited in accessible locations.
E1494, Merseytravel	Sustainable housing does not just mean an energy efficient build, but it must also encompass housing design and how the resident will live in the house and access the necessary services.	Comment noted.
E1494, Merseytravel	Homes should be in a variety of sizes and tenures to meet all needs including affordable housing, jobs and better opportunities for all.	LPSD Policy LPC01 requires development to provide mix of housing in terms of its type, size and tenure to meet the needs of residents in the Borough.
E1508, PWA Planning on behalf of JMB Farming	Site HS20 should be brought forward as an allocation.	Comment noted
E1518, Cass Associates on behalf of Redrow Homes Ltd.	Site GBS_010 (Rainford) should be allocated as a site in the Plan.	Comment noted. The LPSD does not allocate this site. The reasoning for the approach to Green Belt release is set out in the Green Belt Review 2018.

POLICY LPA02 - SPATIAL STRATEGY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie, on behalf of Wallace land Investments.	Part 1 - reference to Rainhill is missing.	Comment noted. Clause 1 of Policy LPA02 in the LPSD makes appropriate reference to Rainhill.
LPPO19, MWA on behalf of J Murphy and Sons Ltd.	Wording should be amended to indicate that safeguarded land could come forward sooner if housing needs are not met.	Comment noted. Clause 4 of Policy LPA05 confirms that if annual monitoring demonstrates the deliverable housing land supply has fallen significantly below the required level, a partial or full plan review will be considered to bring forward additional sites.
E1504, Plot owners of Bell Lane.	Site HS04 should not be safeguarded but rather an allocated site.	Comment noted. The LPSD proposes to keep LPPO site HS04 in the Green Belt. The reasoning for this approach is set out in the St.Helens Green Belt Review 2018.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Site GBS_054 (Rainford) could help boost housing supply in a sustainable manner	Comment noted. The LPSD does not allocate this site. The reasoning for the approach to Green Belt release is set out in the Green Belt Review 2018.

POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Residents of Eccleston do not accept that there is a 'housing crisis' in St.Helens, and feel that the housing figures are inflated on the back of a national narrative, and that does not fit the local housing market.	The LPSD has a reduced housing target of 486 new dwellings per annum. This figure is informed by relevant evidence including the St.Helens Strategic Housing Market Assessment (SHMA) Update (2018). This evidence considered the Government's official population and household projections as the starting point for considering future housing needs.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Does not provide ability to take into account existing open space provision within an area, e.g., where there is currently an excess of open space this should be accounted for when calculating the appropriate amount of open space required. In such instances, the provision of 40sqm per dwelling might exceed that which is actually required.	Under Policies LPC05 and LPD03 of the LPSD, existing surpluses of open space will be taken into account in the assessment of needs connected with new development.
E1492, Sport England	Support part 5 of the policy subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design. Active Design Guidance produced by Sport England in partnership with Public Health England.	Policy LPD03/LPC05 supports the delivery of programmes and strategies that provide and enhance sport and recreational activities such as youth and children's play and sports facilities. Active design principles are addressed in clause 7 of Policy LPA11 'Health and Wellbeing'.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Particularly support new developments to meet the challenges of population growth by providing a mix of types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations.	Support noted. LPSD Policy LPC01 and LPA03(2a) require development to provide for a mix of housing in terms of its type, size and tenure to meet the needs of residents in the Borough.

POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Development Principles, particularly improving the economic well-being of the Borough's residents, which is crucial given the deprivation in parts of the Borough and the high levels of unemployment.	Support noted
E1542, Barton Willmore	Generally supportive of this Policy, but disproportionate to expect all developments submitted to adhere to all the principles outlined. Not all development will be able to respond in a positive way to each of the principles outlined.	Support noted. The first sentence of the Policy has been amended to make it clear that the principles will apply where relevant.
E1549, Persimmon Homes	Generally supportive of the development principles but policy should refer to meeting the challenges of population growth by significantly boosting the supply of homes.	Support noted. Housing supply issues are covered in LPSD Policy LPA05 and Policy LPA05.1.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the Development Principles, particularly improving the economic well-being of the Borough's residents, which is crucial given the deprivation in parts of the Borough and the high levels of unemployment.	Support noted
E1495, CPRE	Broadly supportive of policy	Support noted
E1572, GVA on behalf of Miller Developments	Strategic Site Allocations currently include high-level site specific requirements, it is anticipated that more detailed site-specific requirements can be included in the Publication Draft Local Plan in order to ensure the principles of this policy are met.	Comment noted. Site requirements are set out in Policies LPA04.1, LPA05.1 and LPA10.

POLICY LPA03 - DEVELOPMENT PRINCIPLES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1542, Barton Willmore	Suggest the wording is amended to read <i>"New Development in St.Helens will be expected to support the following development principles where relevant"</i> .	Policy LPA03 has been updated to incorporate the suggested wording.
E1558, Savills (UK) Ltd. on behalf of The Knowsley Estate	The Council should balance this policy against Policy LPA01 and avoid refusing schemes which do not meet all these objectives where it is beyond the scope of the proposed development.	Comment noted.
E1563, Barton Willmore on behalf of Millar Homes	Generally supportive of this Policy, but disproportionate to expect all developments submitted to adhere to all the principles outlined. Not all development will be able to respond in a positive way to each of the principles outlined.	Support noted. The first sentence of the Policy has been amended to make it clear that the principles will apply where relevant.

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Find it difficult to follow the calculations of estimated employment land needs. Are the uplifts based on robust evidence? Will the aspirational quantum of development ever be achieved in reality?	Comment noted. The basis for the employment land needs assessment is set out in the supporting text to Policy LPA04 of the LPSD.

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	More attention should be given to the importance of rural jobs such as farming and forestry and linked sectors such as food and drink.	Policy LPA04 of the LPSD confirms (in clause 7) that appropriate proposals for the diversification of rural economy will be supported. The policy also encourages suitable proposals for the re-use of buildings in the rural areas for employment use. Agricultural land quality has also been taken into account in the Green Belt Review.
E1495, CPRE	Best and Most Versatile (BMV) agricultural land (grades 1-3a) should not be included as local plan allocations.	Agricultural land quality has been taken into account in the Green Belt Review. Whilst some employment land allocations are on BMV land this is justified by the other factors addressed in the Review.
E1495, CPRE	Swamping the market with GB sites will erode the viability of brownfield sites. As St.Helens was built on the back of the Industrial Revolution it is important to reuse previously developed sites to bring forward new opportunities.	The LPSD promotes the reuse of brownfield land in key sustainable locations. However, as the existing urban area does not include sufficient sites of the quantum and type required to meet employment development needs, it is necessary to release land from the Green Belt.
E1495, CPRE	Strongly object to Sites EA2, EA4 and EA9. There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPO sites EA2 and EA9 are still to be allocated. LPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.
E1496, Highways England	Large employment allocations in the GB lack existing sustainable and active transport linkages.	LPSD Policies LPA02 (clauses 5 and 9) and LPA07 address the issue of sustainable transport links. Policy LPA02 states that <i>"high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth"</i> .

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1496, Highways England	The employment strategy currently has significant implications for the SRN, inherently relying on the connectivity the network.	The impact of employment development on the Strategic Road Network is addressed in LPSD Policies LPA02 and LPA07. It has also been considered in the Local Plan Transport Impact Assessment 2018.
E1519, Barton Willmore on behalf of Avenbury Properties	Disagree that site GBS_019 has not been included.	The Council's Green Belt Review (2018) sets out a robust approach to determine which sites should be released from the Green Belt. No further employment sites have been identified for release.
E1557, Peter Brett Associates LLP on behalf of Smith Property developments Ltd. and Interland UL Ltd.	Site within Parkside West (Newton Park) should be allocated for residential development.	Comment noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E0224, Rainhill Civic Society	Large scale distribution places employ fewer people and as such concentrating on small businesses may reduce the need to release so much.	Comment noted. LPSD Policy LPSD04 retains an emphasis on meeting the needs of the logistics sector as this has been identified as a key growth sector within St.Helens and the Liverpool City Region.
E1446, Knowsley Council	Such a significant increase in economic growth will be difficult to pass 'exceptional circumstances'. The sites allocated could bring benefits to Knowsley residents but have poor access.	Comment noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of 215.4 hectares (from 2018 until 2035). Policies LPA02 (clauses 5 and 9), LPA05.1 and LPA07 address the issue of sustainable transport linkages.
E1453, Culcheth and Glazenbury PC.	Concerned over cumulative impact of all employment land on the M6, including EA4, EA8 and EA9	The Council's Infrastructure Delivery Plan(2018) sets out the key infrastructure requirements necessary for development to take place. Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements. Traffic impact has been assessed in the St.Helens Local Plan Transport Impact Assessment 2018.

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1465, Y. Fovargue MP for Makerfield	Additional traffic generated by these sites will lead to further air pollution and traffic will only add to an already high level of congestion.	Policies LPA02, LPA07 and LPD09 address the issues of air quality and traffic impact respectively associated with planned development. Traffic impact has been assessed in the St.Helens Local Plan Transport Impact Assessment 2018.
E1469, Cllrs Banks, Bond & Burns	Concerned with the potential for oversupply and then the impact this will have on our infrastructure.	Policy LPA02 indicates that development will be required to <i>"provide the necessary infrastructure and services"</i> and proposals that are brought forward that fail to meet that expectation will not be permitted. Policy LPA07 makes clear that new development should maintain <i>"the safe and efficient flow of traffic on the surrounding highway network."</i> Infrastructure issues are also addressed in Policy LPA09.
E1479, Edward Landor Associates	Distribution of sites does not meet the spatial objectives. The employment strategy does not cater for small start-up businesses)	Policy LPA04(1d) supports the creation of and expansion of small businesses.
L0770, Parkside Action Group	Policy is founded on employment land estimates which appear highly inflated and erroneous.	The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035). This figure is supported by robust evidence.
FP0456, Residents Against The Development Of Green Belt - Rainhill	Brownfield sites have not been explored, with no register yet in place. Gain clients first before guessing. We should be increasing the GB.	The Council has fully explored the potential for delivery from brownfield sites in finalising the LPSD. Release of Green Belt is needed to meet needs for employment and housing development.
E1250, Rainford Action Group	Research shows that the warehouse and logistics strategy for economic growth is wildly overoptimistic, and forecasts used do not factor in Brexit. Thousands of houses were added to the housing need figures on the basis of this forecasts.	The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035). The LPSD employment and housing policies are robust and consistent with national policies including the NPPF(2018).

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO588, Rainford Action Group	Warehouse jobs will be replaced by automation which equal minimum vacancies. Re-invest into the companies in the surrounding areas, let them flourish.	Comment noted.
LPPO801, Seneley Green PC	Sites close to Seneley Green area may not attract investment to the Borough and risk the area as a 'white elephant'. There are also severe traffic problems in the area.	The LPSD aims, vision and policy framework is to attract investment into St.Helens. Policy LPA04 supports regeneration and growth in sustainable locations. The location of sites to be released from the Green Belt has been guided by the Green Belt Review 2018.
E1502, United Utilities PLC	Supportive but would ask future developers to contact United Utilities as early as possible to discuss water infrastructure requirements to ensure the delivery of development.	Support noted. In preparing the LPSD, the Council has consulted all relevant infrastructure providers to ascertain the level of capacity around the allocated sites. No serious concerns were raised regarding water infrastructure. The Council will encourage developers to contact UU at an early stage when developing their proposals to assess this matter in further detail.
E1448, Wigan Council	Land allocated along the M6 and A580 corridor will bring benefits to both boroughs, and significant investment will be needed at these junctions.	Support noted. The LPSD (for example in Policy LPA07) recognises the need for investment in motorway junctions, including Junction 23 of the M6 and junctions on the A580 corridor.
E1510, Homes & Communities Agency	Strongly supports the allocation of HCA owned site EA1 as a strategic employment site.	Support noted. This site remains allocated in the LPSD.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support policy and suggest that the first sentence should be amended to <i>"High quality employment land has been provided to meet modern employment needs to 2033 and beyond"</i> .	This matter has been addressed (albeit not in the exact form suggested) in the vision (chapter 3).

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1486, McGinn MP	Support in general but the Council need to look at the transport network and the impact these sites will have on it.	Support noted. The LPSD (for example in Policy LPA07) recognises the need for investment in the road network. One of the sites (LPO site EA4) has been moved back from an allocated site to being safeguarded to meet potential post 2035 needs. This is due to the need to address issues concerning Junction 23 of the M6 and as it is not required as an allocation for development in the Plan period.
E1447, West Lancashire Council	Generally supportive but it is unclear whether the housing requirement is sufficient to support the employment growth.	Support noted. This matter is addressed in the supporting text of Policy LPA05 'Meeting St.Helens Borough's Housing Needs'.
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Supportive. However we would request that the policy is amended to provide further clarification on community benefits. The Local Economy SPD should be referenced.	Support noted. Clause 5 of Policy LPA04 has been amended to give greater clarity on the circumstances in which sites which are in or were last used for employment use will be allowed to be re-developed for other uses.
E1580, Jockey Club Racecourse Ltd.	Support policy and suggest it is amended to refer to 'tourism resources and facilities, cultural and visitor attractions' rather than simply 'tourism resources' and 'appropriate to the local context' wording be removed	Support noted. Policy LPA04 refers to tourism resources, facilities and attractions.
E1447, West Lancashire Council	Support the focus of growth on the M6 corridor and the forward thinking in setting the employment land requirement.	Support noted
E1460, Cllr Glover	Attractive areas close to good transport links are well identified.	Support noted
E1563, Barton Willmore on behalf of Millar Homes	The Plan is correct to deliver the upper range of the Objectively Assessed Need (OAN).	Support noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPO stage to a figure of at least 215.4 hectares (from 2018 until 2035).

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1502, United Utilities PLC	All United Utilities resources will need to be afforded due regard in the master planning process for any site. There does not appear to be any text requiring developers to pay due regard to the position of existing water supply and wastewater infrastructure.	Policy LPA08 requires new development to be adequately served by infrastructure.
	Our site (FDL Packaging Site (Site Ref: 153) 2016 SHLAA) would be better allocated as a brownfield site for residential development as opposed as an employment site.	Comment noted. The site is not allocated for housing or employment in the LPSD. The site is identified in the SHLAA 2017.
E1448, Wigan Council	Need to ensure that there is sufficient projected demand during the plan periods to warrant this level of allocation and Green Belt release.	Comment noted. The quantum of employment development required by Policy LPA04 has been slightly reduced since the LPPO stage to a figure of at least 215.4 hectares (from 2018 until 2035).
E1495, CPRE	Duty to Cooperate issues, as it appears the whole of the North West is planning for such growth, where will the people come from to work here.	The Council has worked closely with neighbouring Councils, the Liverpool City Region Combined Authority, and other public bodies in addressing key strategic planning issues such as housing, the economy, infrastructure and strategic environmental assets. Further details of this joint working are set out in the supporting text to Policy LPA04.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Suggest that reference is made to the suitability of the Florida Farm North site for logistics development given its location on the strategic road network and close to existing businesses and local labour.	Comment noted. This site remains allocated for employment development including logistics.
E1491, NFU	Criterion 6 - recommend references an aim to protect the best and most versatile agricultural land as well as supporting and protecting agricultural and farming operations.	Comment noted

POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	There is enough vacant land each side of the East Lancs heading up towards Manchester that could be used and would have suitable access onto the East Lancs and M6	Comments noted. No surplus of site provision has been identified within Greater Manchester to help meet the employment land needs of St.Helens.
E1488, Historic England	Criterion 5 contrasts with para 4.81 which appear to focus on demolition and rebuild.	Comment noted.

SITE EA1 - OMEGA SOUTH WESTERN EXTENSION

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA1 is still proposed to be allocated for employment development.
LPPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.

SITE EA1 - OMEGA SOUTH WESTERN EXTENSION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Brownfield land in St.Helens should be developed on first	Policy LPA02 promotes the reuse of brownfield land in key sustainable locations.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes. HGVs will have to use inappropriate local roads or the already over utilised M62 Junction 8.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
	No public transport linkages have been proposed.	Policy LPA05.1 requires the development of all strategic employment sites (including this site) to be informed by a master planning exercise which will address public transport linkages.
	Development would result in increase of HGVs and associated pollution across nearby residential areas.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
	Sections of ancient woodland will be threatened and removed.	Policy LPC10 confirms that development resulting in the loss or deterioration of any area of ancient woodland or of any ancient or veteran tree will be refused unless there are wholly exceptional circumstances in which the need for, and benefits of, the development would clearly outweigh any resultant loss and a suitable mitigation strategy exists.

SITE EA1 - OMEGA SOUTH WESTERN EXTENSION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1583, Warrington Borough Council	Access work has highlighted that both local and strategic road networks will be placed under considerable pressure, therefore Omega must demonstrate the impact of the additional traffic would have on these networks and show mitigation measures etc.	These factors have been taken into account in the Green Belt Review 2018. Policy LPA07 also makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. Policy LPA08 requires new development to be adequately supported by infrastructure. Further requirements concerning this site are set out in Policy LPA04.1 and the site profiles appendix in the LPSD.
E1510 Homes & Communities Agency	Strongly support the allocation of HCA owned site EA1 as a strategic employment site.	Support noted.
E1572, GVA on behalf of Miller Developments	The allocation of EA1 'Omega South Western Extension, Phase 1, Land north of Finches Plantation, Bold' as employment land is fully supported. As demonstrated by the indicative masterplan, this level of floorspace can comfortably be accommodated on the site taking into account known constraints. There are no identified issues with the requirements for all strategic employment sites in principle. Wording should be amended to include B2/B8 uses and B1a uses where they are ancillary.	Support noted. The wording of Policy LPA04 has not been revised to include ancillary Class B1a uses as these would not require planning permission anyway if they are truly ancillary to a Class B2 or B8 use.
E1583, Warrington Borough Council	The site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington and continue to provide employment opportunities to the residents of St.Helens.	Comment noted

SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA2 is still proposed to be allocated for employment development.
E1495, CPRE	There is a lack of exceptional circumstances to justify release of sites from the Green Belt. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Traffic, congestion and air quality are addressed by other policies including LPA04.1, LPA07 and LPD 09.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat for wildlife which are currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
	Flood Risk – Development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	Flood risk issues relating to this site are addressed in Policy LPA04.1.

SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways Impact - development will increase traffic congestion and worsen existing capacity issues.	LPSD Policy LPA07 makes clear that new development should maintain <i>"the safe and efficient flow of traffic on the surrounding highway network."</i> Highways impact issues are also addressed in Policy LPA04.1.
	Increased traffic will further deteriorate local air quality with associated health impacts.	Air quality issues are addressed in Policy LPD09.
	Visual impact - the development will create an eyesore.	This matter is addressed in Policies LPA04.1 and LPC09.
	Wildlife – development of the site will impact on bird habitats on land off Slag Lane.	LPSD Policy LPC06 addresses how biodiversity issues will be addressed at the planning application stage.
	Mining legacy/land stability – historic coal workings will need to be investigated.	Comment noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Fully support the inclusion of Site EA2. However the boundary needs to be amended and Highways England confirmed no enhancement work was required, and the Environment Agency did not request a 25m easement from Clipsley Bank, therefore both these elements need to be removed from the policy.	Comments noted.

SITE EA3 - LAND NORTH OF PENNY LANE, HAYDOCK (note: planning permission has now been granted for an employment development on this site)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA3 is still proposed to be allocated for employment development.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	This site is adjacent to Local Wildlife Sites 'Kilbruck Lane and 'Plantation Copse and Ponds'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA2 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.

SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA4 is now proposed to be safeguarded to meet potential employment land needs after 2035, instead of being allocated for employment development. This revised approach is in the light of the need to address junction capacity issues at junction 23 of the M6 which is immediately adjacent to the site. Further reasoning is set out in the Green Belt Review 2018.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA4 is to be removed from the Green Belt but safeguarded to meet potential employment development needs after 2035. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
E1495, CPRE	There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.

SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	<p>This site is adjacent to Local Wildlife Site 'Haydock Park Woodland'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.</p> <p>Highways/Traffic - development will increase traffic congestion and worsen existing capacity issues at M6 Junction 23.</p>	<p>LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.</p> <p>LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035. This approach will provide time to address the junction capacity issues at junction 23. In addition, policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network.</p> <p>Infrastructure issues are also addressed in policy LPA08. The improvement of junction 23 is identified as a key priority in the St.Helens Infrastructure Delivery Plan (IDP) 2018.</p>
E1453, Culcheth PC	Object to this site being allocated, along with other sites in the vicinity such as Parkside. The M6 is already frequently blocked forcing traffic to use A and B roads through our village as escape routes.	LPPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035. This approach will provide time to address the junction capacity issues at junction 23. In addition, policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network. <p>Infrastructure issues are also addressed in policy LPA08. The improvement of junction 23 is identified as a key priority in the St.Helens Infrastructure Delivery Plan (IDP) 2018.</p>
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Site allocation EA4 is fully supported. However, object to the detailed site boundary of the allocation, the boundary should be extended to include additional land at the eastern end of the site to reflect the land area that is being progressed to a planning application.	Comment noted. The boundary of the site has not been extended to the east as requested as this would represent a narrow 'neck' of development protruding into the Green Belt. Other boundary changes have been made as set out in the Green Belt Review 2018. The site is now proposed to be safeguarded rather than allocated.

SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1448 Wigan Council	Generally supportive, Site EA4 should complement the racecourse and promote the site as a regional facility.	Support noted. The Council will continue to engage with neighbours as part of the Duty to Cooperate to ensure that any new strategic cross-boundary issues are effectively addressed.
	Happy with the release of land for site EA5, but not happy with the types of use proposed.	Support noted.

SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA5 is still proposed to be allocated for employment development.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA5 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.

SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
	Support the release of land from Green Belt for site EA5, but not happy with the proposed types of use proposed for.	Support noted. The proposed uses (B2 and B8) are suitable for this location.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.

SITE EA6 - LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA6 is still proposed to be allocated for employment development.

SITE EA6 - LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood Risk – development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	LPSD Policy LPC12 addresses flooding issues associated with development. It establishes that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted.
	Highways Traffic - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 makes clear that new development should maintain <i>“the safe and efficient flow of traffic on the surrounding highway network.”</i> Infrastructure issues are also addressed in Policy LPA08.
	Visual impact - the development will create an eyesore.	LPSD Policy LPC09 addresses the visual impact from new development.
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion.	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
E1521, Michael Sparks Associates on behalf of Canmoor Developments Ltd.	The Haydock Industrial Estate is a successful business area and the allocation of this site will form a logical extension to this employment location. This site benefits from an existing access and nearby infrastructure. This will allow this site to come forward quickly to meet employment needs within St.Helens. This site is available and suitable for employment development and its allocation is supported.	Support noted.

SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Land should not be removed from the Green Belt at this location - warehouse development at this location is not an exceptional circumstance that should justify the loss of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site EA7 is still proposed to be allocated for employment development.
E1465, Y. Fovargue MP for Makerfield	The GB status of this site contributes to the divide between our neighbouring communities and should be maintained. Without it Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, and habitat to wildlife, which is currently enjoyed. The removal of these sites would also have the potential to undermine efforts to promote the regeneration of Brownfield sites.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPPO site EA7 is still to be allocated. Greenspace, air quality and wildlife habitats are addressed by other policies including LPA04.1, LPA09, LPC 06, LPC 08 and LPD09.
	Flood Risk – development of this site will result in increased risk of flooding at Blackbrook as a result of the proposed development; the site is already prone to flooding.	LPSD Policy LPC12 addresses flooding issues associated with development. It establishes that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. This issue is also addressed for this site in Policy LPA04.1.
	Highways Traffic - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 makes clear that new development should maintain “the safe and efficient flow of traffic on the surrounding highway network.” Infrastructure issues are also addressed in Policy LPA08.
	Visual impact - the development will create an eyesore.	LPSD Policy LPC09 addresses the visual impact from new development.

SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Bond, Burns & Banks (Haydock Ward Councillors)	Residents believe that this site along with others in the Haydock vicinity is unsustainable and will only add to the existing highway congestion.	The LPSD housing and employment allocations went through vigorous Sustainability Appraisal and Strategic Environmental Assessment to address any social, economic and environmental impacts from the development. Transport impacts are also addressed in policies LPA07 and LPA08.
E1521, Michael Sparks Associates on behalf of Canmoor Developments Ltd.	Strongly support allocation of Site EA7, however it is considered that requirements for implementing access to a site could constrain future development, a 25m easement along Clipsley Brook is questioned, the policy appears too prescriptive.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development will result in significant detrimental impact on the M6 and local roads.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0278, Parkside Action Group	Despite being a rail freight interchange, 85% of freight will still be transported by road, therefore adding to congestion which is already an issue. There is no-longer a need for Parkside East as a rail freight terminal due to Omega South West Logistics at Warrington.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. Policy LPA07 addresses the issue of traffic impacts from development. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
	Photographs used were deliberately chosen to show Parkside as a concrete block instead of showing its woodland, wildlife, fauna and flora.	Comment noted.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site includes Local Wildlife Site 'Gallows Croft'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
	This could be a wind farm, which will not cause traffic. There is a mine below and a substation to be put into.	Comment noted
E1453, Culcheth PC	Object to this site being allocated, the M6 is already frequently blocked forcing traffic to use A & B roads through our village as escape routes.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1, LPA08 and LPA10. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495 CPRE	Strongly object to a SRFI here as it will severely harm the ability of the Newton-le-Willows Green Belt to fulfil its purposes, as well as causing adverse environmental and social impacts, and due to the spare capacity on the West Coast Mainline.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1488 Historic England	There is no mention that site lies near designated heritage assets, despite being identified in the SA and its conclusion that effects on the assets are likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E1458, Winwick PC	The aspirations for Parkside East to be developed as a SRFI are not realistic given movements of goods by this method of transport, which could lead to a site being used for a different purpose and further impact on local roads.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1458, Winwick PC	Development of this site would be harmful to the open aspect of this area for residents of Winwick.	Policy LPC09 addresses the visual impact from new development.

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1532, Lane Head Residents' Association	Development to the west and east of the former Parkside Colliery is likely to have a profound environmental impact, relating to air pollution levels rising. The level of traffic will no doubt increase, bringing even further congestion problems and the associated air pollution road safety risks.	Policies LPA07, LPA10 and LPD09 address this through provision to minimise traffic and associated impacts including air pollution. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.	
	Parkside multi-modal rail/freight interchange is an example of a good idea but in the wrong place, there is no spare capacity.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.	
	Peel Ports will not use Parkside as they already have Port Salford just down the line, and further to that down the river, we have Ellesmere Port. On the Manchester Ship Canal we have 3MG Runcorn and Port Warrington some established, others being developed.	Comment noted.	
E1457 Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support noted. The bullet points in Policies LPA04.1 and LPA10 have been revised.	

SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1496, Highways England	Site EA8 will potentially generate a number of vehicle movements which may impact on J22 of the M6, and requires direct access to the site via the M6. It should be noted that as part of the Smart Motorway upgrade J22 is identified for improvements and scheme/design for direct access to the site would need to pay due cognisance to this proposal.	Policies LPA07 and LPA10 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1496 Highways England	The IDP and transport evidence base for the site allocations is not yet available for review. As this site has the potential for significant impacts on the SRN, and require HE's cooperation in regard to a new access point, it is essential that this transport evidence base is reviewed as soon as possible	The Council will publish the IDP and relevant transport evidence with the LPSD. The Local Plan Transport Impact Assessment provides supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St.Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA10 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development will result in significant detrimental impact on the M6 and local roads and worsen air quality.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1 and LPA08. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
L0770, Parkside Action Group	A strategy to promote large scale logistics will also bring with it heavy levels of traffic and air pollution. The policy makes no provision for underpinning infrastructure including transport, social, health and education. Releasing this amount of land will result in a "trolley dash" by developers, leaving Brownfield sites undeveloped. Lack of phasing and monitoring will result in a lack of demonstrable sustainable benefits.	Policy LPA07 addresses the issue of traffic impacts from development. Policy LPA08 provides a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities. Policy LPA02 promotes the reuse of brownfield land in sustainable locations. Air quality issues are addressed in Policy LPD09. Policy LPA04.1 requires development of the site to be informed by a master plan which should include phasing.
E1495, CPRE.	There is a lack of exceptional circumstances. The site will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPO site EA9 is still to be allocated. Traffic, congestion and air quality are addressed by other policies including LPA04.1, LPA07 and LPD 09.

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0770, Parkside Action Group	Previous documents make it clear that Parkside West should only be set aside for the purpose of an SFRI. It is clear that the only reason to remove it from its intended purpose is to support the Council's relationship with Langtree development.	Parkside West (site 8EA) and the Parkside East site are required to provide the single largest economic development opportunity in the Borough. The parts of the site which are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.
E1532, Lane Head Residents' Association	Development to the west and east of the former Parkside Colliery is likely to have a profound environmental impact, relating to air pollution levels rising. The level of traffic will no doubt increase, bringing even further congestion problems and the associated air pollution road safety risks.	Policies LPA07, LPA10 and LPD09 address these points through provision to minimise traffic and associated impacts including air pollution. The proposed Parkside link road will address the issues by providing a direct link to junction 22 of the M6.
E1453, Culcheth PC	Object to this site being allocated, the M6 is already frequently blocked forcing traffic to use A & B roads through our village as escape routes.	LPSD Policy LPA07 addresses the transport impacts from development. It states that all proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement. Transport impacts are also addressed in Policies LPA04.1 and LPA08. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1488, Historic England.	There is no mention that site lies in close proximity to designated heritage assets, despite being identified in the SA and its conclusion that the effect on them is likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E0278, Parkside Action Group	Parkside West site should be used as a university campus.	Comment noted.
	Site should be redeveloped into a science technology park instead of warehousing.	Comment noted

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site should be redeveloped as a golf course, swimming pool, leisure facility or cycle velodrome.	Comment noted
	Site is unsuitable for commercial uses or railroad development.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this or to provide other rail enabled uses. The suitability of the Parkside West site for employment development is addressed in the St.Helens Green Belt Review 2018.
	Site should be affordable housing only.	Comment Noted
E1481, Spawforths on behalf of Parkside Regeneration LLP	The release of Green Belt to accommodate the pent up demand/deficit for new employment floorspace is supported. The identification of Parkside West as a phased (non-rail) strategic employment site that will contribute to meeting employment requirements on a partially brownfield site as well as providing a significant boost to the local economy is supported.	Support noted
E1481, Spawforths on behalf of Parkside Regeneration LLP	Support policy and the identification of Parkside West for B2 and B8 development as part of a wider quantum of development to meet the needs of St.Helens and wider City Region.	Support noted

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1481, Spawforths on behalf of Parkside Regeneration LLP	Allocation supported but object to proposed criteria relating to the land retained for a potential future rail access path. We understand that the future delivery of EA8 is not inhibited however we consider the position of the safeguarded land would impede on the deliverability of EA9. We will continue to talk with the Council to reach an agreement on this matter.	Support and comment noted. The alignment of land in Parkside West to provide a future siding for the rail uses in the Parkside East site is informed by relevant technical evidence. No changes in this alignment have been identified in the LPSD.
E1557, Peter Brett Associates LLP on behalf of Smith Property Developments Ltd. and Interland UK Ltd.	Endorse the release of land at Parkside West from Green Belt and consider that land at Newton Park Farm (situated within the EA9 site) should be allocated for residential development, as the Council clearly considers that this section of GB no-longer fulfils the five purposes of GB as set out in the NPPF.	Support noted. The LPSD does not allocate land at Newton Park Farm for residential development, as this would severely and unacceptably constrain the layout of the strategic employment site at Parkside West.
E1457 Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support noted. The bullet points in Policies LPA04.1 and LPA10 have been revised.
E1486, McGinn MP	Welcome the inclusion of Parkside and the identification of Earlestown as the second town centre within the Borough, however it needs to be made clear that traffic generated from the Parkside development will be directed to the motorway to minimise the impact on local roads.	Support noted. LPSD Policies LPA04.1 and LPA07 address the issue of traffic impacts from the development.

SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St. Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA04.1 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.

SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	The principle of developing this site for employment development is established in the St. Helens Unitary Development Plan 1998. The LPSD proposes to carry its allocation for this use forward.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife site 'Rainford Brook' runs to the south. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.

SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1517, Frost Planning on behalf of English Land Ltd.	The issues raised by those in support of this proposed site included: site should be allocated for employment use, inclusive of B1/B2/B8 uses, with extended boundaries to show access from both Pasture Lane and Sandwash Close.	Support and comment noted. The uses for which the site is allocated are Class B2 and B8. The LPSD also does not extend the site area. The extended site area would encroach into the Green Belt. Having regard to the findings of the Green Belt Review 2018, the relevant area has not been selected for Green Belt release.
E1563, Barton Willmore on behalf of Millar Homes.	Allocation of this site is fully supported as a preferred location for employment.	Support noted

SITE EA11 - LAND AT LEA GREEN FARM WEST, THATTO HEATH

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There is insufficient infrastructure in Sutton Heath, Lea Green and surrounding area.	Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities.

SITE EA12 - GERARDS PARK, PHASES 2 AND 3, COLLEGE STREET, ST.HELENS TOWN CENTRE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust	Local Wildlife site 'St.Helens Canal' is adjacent. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Site EA12 - Gerards Park has received full Planning Permission (Ref.P/2016/0903) and is a natural extension of an existing site.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Object to sites EA8 & EA9 due to the impact on GB and the M6 and local roads, as this development will create more traffic.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPO sites EA8 and EA9 are still proposed to be allocated for employment development. Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.
E1461, Croft Parish Council	Concern that too many HGV's may take routes through residential villages.	Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.
E1461, Croft Parish Council	The increase in traffic congestion especially in areas identified for warehousing will only add to the existing heavily congested roads and motorways.	Traffic issues are addressed in Policies LPA04.1, LPA07 and LPA08.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1469, Cllrs Banks, Bond & Burns	Haydock residents are concerned they are shouldering more of their fair share of growth and as such this will have a detrimental impact on them through increased traffic, pollution, flood risk and lack of infrastructure.	LPSD does not propose that there is an even distribution of sites across the Borough, rather that the sites identified are those that sited at sustainable locations and are deliverable and to meet objectively assessed housing and employment needs. Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. In addition, Policy LPA08 addresses infrastructure issues.
E1469, Cllrs Banks, Bond & Burns	Concern over the impact of the proposed employment sites on J23 of the M6 which is unable to cope with any further development. Parkside West is unsuitable to meet the modern SRFI requirements and hence that the site should no longer be identified as a potential future SRFI. We also object to the proposed criteria relating to the land retained for a potential future rail access path.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. One site (EA4) which is next to junction 23 is now proposed to be safeguarded rather than allocated. The Parkside West site (site 8EA) is allocated for Class B2 and B8 employment uses i.e. is not limited to development as an SRFI. The alignment of land in Parkside West to provide future siding facilities for the rail uses in the Parkside East site is informed by relevant technical evidence. No changes in this alignment have been identified in the LPSD.
E1488, Historic England	There is no mention that Sites EA8 and EA9 lie in close proximity to designated heritage assets.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.
E1495, CPRE	Strongly object to Sites EA2, EA4 and EA9. There is a lack of exceptional circumstances. The sites will add severely to traffic congestion and reduction in air quality. The scale of the warehouses will engulf the nearby villages of Newton-le-Willows and Vulcan Urban village.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. For reasons set out in the Green Belt Review, LPO sites EA2 and EA9 are still to be allocated. LPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Generally support the policy but object to the provision of a minimum 10% of energy requirements through on site generation of renewable or low carbon energy. It should not be policy requirement to address existing issues.	Policy LPA04.1 does not now contain a target for renewable or low carbon energy. However, Policy LPC13 maintains the requirements for housing and employment development to provide for at least 10% renewable or low carbon energy. This approach is aligned with Government national policy and guidance.
E0278, Parkside Action Group	Parkside West site should be used as a university campus	Comment noted.
E0278, Parkside Action Group	There is no longer a need for Parkside East as a rail freight terminal due to Omega South West Logistics at Warrington.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use.
	The exceptional circumstances test can only be passed once it is clearly established that there are no suitable, sustainable alternatives outside the GB. Land at Junction Lane, Newton-le-Willows should be released for development before GB.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
E1457, Cllrs Gomez-Aspron, Bell and Dyer	Support the policy as a whole but would like some clarification on some of the bullet points in regards to Sites EA8 & EA9.	Support. Relevant bullet points have been updated.

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1458, Winwick Parish Council	Welcome the Council's commitment to engage with Warrington Council to carry out a comprehensive transport assessment, however the Policy should state that no construction will be permitted on Parkside West until such time as the link road to the M6 has been constructed.	Comment noted. The phasing issues must be addressed under the master planning requirements of Policy LPA04.1
	Parkside Regeneration fully supports the identification of Parkside West as a phased (non-rail) strategic employment site.	Support noted.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Fully support the inclusion of Site EA2, however the boundary needs to be amended and Highways England confirmed no enhancement work was required, and the Environment Agency did not request a 25m easement from Clipsley Bank, therefore both these elements need to be removed from the policy.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1. noted.
	Strongly support allocation of Site EA7, however it is considered that requirements for implementing access to a site could constrain future development, a 25m easement along Clipsley Brook is questioned, the policy appears too prescriptive.	Support noted. These issues relate to the master planning of the site and will therefore need to be addressed under Policy LPA04.1.
	Generally support the high level site specific requirements in principle but it could be difficult to connect to land that is adjoining but safeguarded.	Support noted

POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1448, Wigan Council	Generally supportive, Site EA4 should complement the racecourse and promote the site as a regional facility.	Support and comment noted.
E1583, Warrington Borough Council	Supportive of the principle of the Parkside Strategic Employment Development site but there are potentially significant highways and environmental impacts for Warrington residents, if traffic from Parkside uses Warrington's local road network to access the motorway network, therefore the Council should ensure that this impact is kept to a minimum. Committed to working constructively with St.Helens as the proposals and mitigation measures for Parkside are worked up in detail.	Support noted. Policies LPA07 and LPA04.1 address the issue of traffic impacts from the development of this site. The Local Plan Transport Impact Assessment has also provided supporting evidence to demonstrate the capacity which exists at junction 22 of the M6. The proposed Parkside link road will address this issue by providing a direct link to junction 22 of the M6.
E1448, Wigan Council	Must ensure that Site EA4 compliments the racecourse and helps promote the site as a regional facility.	Comment noted
E1469, Cllrs Banks, Bond & Burns	Question there being no alternative brownfield land that can accommodate this type of development.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
	Avenbury Properties believes that their Site (GBS_019) should be included within Policy LPA04.1, which should be amended accordingly.	Comment noted. No additional sites have been added to the list of strategic employment sites.
E1496, Highways England	Highways England must be involved at the earliest opportunity in the development of these sites, including masterplanning and scoping for Transport Assessment and Travel Plans.	Comment noted. The Council will continue to engage with key stakeholders including Highways England at all relevant stages.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO801, Billinge & Seneley Green PC	The number of houses assessed as being required up to 2033 is questionable when it would appear the population is significantly less than twenty years ago rising only in the last five years by a little under 2,000 to bring it back to approximate 2001 levels.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
LPPO801, Billinge & Seneley Green PC	A significant number of unoccupied properties in the town would satisfy the more immediate, estimated increase in population, and would satisfy the shortfall in the total number of homes noted as being required for the life of this Plan after brownfield sites have been used.	Whilst the Council is pro-active in encouraging the re-use of empty homes, it cannot control the numbers falling into vacancy. The number that are long-term vacant and that have the potential to be brought back into use is also limited.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Build out rates are considered incorrect and as such more sites would be needed to meet the OAN	Comment noted. The OAN has been reduced – see the supporting text to Policy LPA05.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Concerned that the allocated and safeguarded sites have not been rigorously assessed.	The tables of allocated and safeguarded sites have been revised to take account of more up to date evidence including the SHLAA 2017 and the Green Belt Review 2018.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Criteria 3 should be reviewed further to ensure the Plan is up to date at the point of adoption.	The approach in Policy LPA05 criterion 3 is considered to be aligned with national policy and guidance.
	The estimated delivery of 45dpa is considered to be a too conservative.	Comment noted. The site delivery estimates and the housing trajectory have been updated and are considered to be robust.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Further work is necessary to justify the level of growth proposed. The OAN for the new LP should be based on the SHELMA numbers.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
	Five representors commented that density should be considered on a case by case basis and not impose broad ranging density requirements.	Comment noted. The density requirements in Policy LPA 05 are minima but allow some flexibility in specific circumstances.
	Density requirements should be scrapped.	Density requirements are retained in Policy LPA05. This approach is in line with national planning policy.
	Two representors commented that there is now a dramatic commitment to jobs led growth but housing targets have not changed. Additional housing sites should therefore be given serious consideration to reflect the ambitions for growth.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
	Four representors expressed concern that Part 4 is too vague and that infrastructure considerations should be considered now.	Comment noted. Infrastructure requirements are addressed in Policy LPA08.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Nine representors stated that Part 6 - the approach in dealing with any shortfall would be too slow, suggest a number of safeguarded allocations are brought forward and triggers set out.	The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1250, Rainford Action Group	The St.Helens Local Plan assumes an increased population based almost entirely on “ <i>Unexplained Population Change</i> ” (UPC). Census data shows that St.Helens' population has been falling for 30 years but the projection consistent with that long-term trend is ignored in favour of one that includes UPC.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
E1250, Rainford Action Group	The number of houses the council wants to build is inflated by an arbitrary 26%. The housing need figures quoted in the plan are not supported by population growth or housing need, or any proper calculation.	LPSD housing figures are based on robust local evidence as set out above.
	The Council has not calculated a shortfall in and as such additional sites should be allocated.	LPSD housing figures are based on robust local evidence.
	Two developers object to the phasing of housing. too much reliance on sites coming forward from the SHLAA. to make the Plan sound it is considered that other land (GB Parcel Ref: 68) should be excluded from the GB boundary and allocated for housing.	Comment noted. There is no justification for bringing forward additional land from the Green Belt beyond that proposed in the LPSD.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two agents objected to Part 4 – safeguarded land should be able to come forward within this Plan period.	Comment noted. The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
	Site HS11 should be a housing allocation and not a safeguarded site.	Comment noted. Following the reduction in the housing requirement figure, site HS11 is now proposed to remain in the Green Belt. The reasoning for this is set out in the Green Belt Review 2018.
	Development in Rainford, Eccleston and Windle will increase the existing traffic congestion.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. Following the reduction in the housing requirement figure, some sites in Rainford and Eccleston are now proposed to remain in the Green Belt. The reasoning for this is set out in the Green Belt Review 2018.
	Two representatives expressed concern over significant issues in terms of education facilities, GP's and parking in Rainford, further development will exacerbate these.	Policy LPA08 addresses social infrastructure issues associated with new development.
E1468, Cllr Long	West Park residents will only be able to buy affordable homes on greenfield sites and are concerned over the potential highway congestion and lack of services.	Comment noted. Policies LPC01 and Policy LPC02 set out the policy framework to deliver a suitable housing mix including affordable housing. Due to viability issues, no affordable housing is required on brownfield sites in most areas. Policies LPA07 and LPA08 address traffic impacts and infrastructure.
	Two landowners object to the policy as too few housing sites are allocated in the Plan, especially Rainford.	Comment noted. The LPSD housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.
	PIP should be incorporated now to ensure the Plan is up to date at the point of adoption.	Comment noted.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE.	Question whether the high jobs assumptions in compiling this evidence are robust, and whether the housing industry has the capacity to build at this level. The OAN is vastly inflated.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05.
E0224, Rainhill Civic Society	Options 1 & 4 are both more realistic alternatives.	Comment noted
E1447 West Lancs Council	The housing provision should match the increased employment land, although this housing could be in a different authority.	Comment noted. The LPSD housing provision makes a suitable allowance for additional employment on the employment land allocations.
E1250, Rainford Action Group	Do not accept the 570dpa housing figures. The OAN is overstated and dependent on unreliable figures, the population is falling and modelling work is hard to understand. It does not factor in Brexit or the uncertainty behind economic growth forecasts. Serious concerns are raised regarding the method in which the Borough's future housing need figures have been arrived at, in turn questioning if the 'exceptional circumstances' necessitating Green Belt release have been demonstrated.	The LPSD has a reduced housing requirement of 486 dwellings per annum. This is supported by updated housing evidence including the Strategic Housing Market Assessment (SHMA) update 2018. The figure of 486 dwellings per annum slightly exceeds the figure of 468 dwellings per annum derived by using the Government's standard method (applied to the 2014 based household projections). The reasoning for the housing requirement is set out in the supporting text to Policy LPA05. There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	The additional 26% calculation applied on top of the OAN to arrive at the 570 dwelling per annum figure is unsupported not clearly explained.	The LPSD does not use the figure of 570 dwellings per annum.
E1250, Rainford Action Group	The apparent lack of brownfield land directly contradicts the Core Strategy adopted by St.Helens Council in 2012. Just four years ago, St.Helens Council claimed 80 percent of development needed could be achieved on previously developed land. There has been insufficient building on brown field sites in the last four years for that policy to change so dramatically.	The LPSD covers a Plan period up to 2035 i.e. 8 years beyond the Core Strategy. Its approach of requiring some land to be released from the Green Belt is fully justified in accordance with the NPPF(2018).
FP0456, Residents Against The Development Of Green Belt - Rainhill	Estate agents are saying there is currently 3,000 houses in the Borough up for sale, from £60,000 to £80,000.	Comment noted.
	How can the Council justify an increase of the population to 6.843, and want to build 13,110 new homes?	The reduced housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.
E1250, Rainford Action Group	Rainford does not have the infrastructure to cope with the proposed additional new homes. Existing brownfield sites in the town centre should be utilised, creating more affordable homes closer to the town centre.	Infrastructure issues are addressed in Policies LPA07 and LPA08.
E1458, Winwick PC.	Sites HA13, HS13, HS14 & HS17 will generate further traffic putting more pressure on already heavily congested roads.	LPSD Policy LPA07 addresses the issue of traffic impacts from development.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	The OAN figures have changed from the scoping document, the Plan's population is 30% higher than the ONS. Clear evidence needs to be provided to show that a lack of affordable housing is leading people to leave the Borough. House prices are falling allowing more people access to the housing market.	<p>Comment noted.</p> <p>The LPSD housing requirement of 9,234 dwellings per annum set out in Policy LPA05 is designed to meet in full Objectively Assessed Need (OAN) for new housing in the Borough.</p>
E1494, Merseytravel	<p>The Council has a Duty to Cooperate across the Housing Market Areas and there should be mechanisms for this to take place.</p> <p>Delivering just houses and not communities will just create dormitory suburbs and towns and so lead to greater commuting and long distance commuting; this will then have significant implications for the transport infrastructure.</p> <p>Support Alternative Option 2 for a housing target of 712 dpa based on our assessment of the adjustments needed to the SHMA.</p>	<p>The LPSD has been positively prepared. It seeks to meet St.Helens objectively assessed needs, and is informed by on-going engagement with neighbouring authorities.</p> <p>The LPSD promotes job creation and sustainable communities. Sustainable transport infrastructure requirements are addressed in Policies 04.1, 05.1 and LPA07.</p>
L0770, Parkside Action Group	A disproportionate amount of housing is targeted for Haydock and Newton-Le-Willows. The Council has not properly explained how the deallocation of Green Belt land to meet housing needs has met 'Special Circumstances'.	<p>Comment noted.</p> <p>There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land (including in Haydock and Newton-le-Willows) has been reduced compared to that proposed at Preferred Options stage.</p>

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	Use brownfield land before GB	Policy LPA02 promotes the re-use of brownfield land in Key sustainable locations.
LPPO801, Seneley Green PC	There are a significant amount of empty homes in the town centre which need to be used before development starts in the GB. The town centre would benefit from more housing closer to the heart of the Borough.	Whilst there is a role for the reuse of empty homes in helping to meet the Plan's housing requirement, it is not considered that this can realistically amount to a significant number of properties as the number that are long-term vacant and that have the potential to be brought back into use is limited.
	Support para 4.111 and part 6 of policy LPA05 and the Council's approach of identifying safeguarded land to meet future needs	Support noted
E1445, Sefton Council	Welcome the reference to the SHELMA in the justification and its importance as a piece of evidence.	Support noted
	Support the density flexibility text, in Part 6, however, phasing should be avoided as it can have negative impacts on delivery of sites.	Support noted
	Support the Key Settlements and agree that exceptional circumstances exist for targeted release of GB in order to meet identified needs.	Support noted
	Fully support the identification of sites HA14 & HA15; however both sites have the potential to yield more dwellings.	Support noted. Site HA14 has been removed as an allocation in the LPSD.
	Two developers support Part 6 but the policy should go further and establish clear triggers for a LP review.	Comment noted.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Three representors support the Council's conclusion that the absence of sufficient land within settlement boundaries in response to the housing requirement, provides special circumstances required to review the GB boundaries	Support noted
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Agree that a proportion of housing should be met from sites identified in the SHLAA and windfall gains, our site would be perfect for this (SHLAA 2016 Ref: 153).	Support noted
	Support the policy but indicative density below 30dph should be evaluated on a site by site basis.	Support noted. Policy LPA05 allows for some flexibility in dealing with density issues.
	Support the policy in principle, however it should recognise that some safeguarded sites may need to come out in this Plan period.	The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support HA10 as an allocation.	Support noted. This site is however removed as a site allocation in the LPSD.
	Support the fact that land will need to be released from GB.	Support noted
	Support the recognition of HS11 as a safeguarded site.	Support noted.
	Three representors support the uplift in housing numbers, however suggest it should be made clear if this is gross or net.	Support noted. The target of 486 per annum in the LPSD is net of losses through demolitions and conversions.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Agree that adequate affordable housing and types suitable for aging population must be delivered.	Support noted
E1496, Highways England.	Phasing of development could be crucial in ensuring the deliverability of the plan's allocated sites.	The approach of the LPSD will ensure an adequate degree of flexibility and choice in the supply of housing at any one time, and avoid prejudicing the overall delivery of housing if there are unforeseen delays in specific sites coming forward.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Agree with the wording, scale and rationale of the policy, justification text needs to be amended to avoid confusion.	Comment noted
E1460, Cllr Glover	The Council needs to aim high to give choices and to attract various developers.	Comment noted
E1486, Mr McGinn MP	Generally supportive but concerned the impact of this amount of additional housing will have on existing schools, NHS facilities, particularly Rainford, Garswood, Billinge and Windle where residents feel these services are already overstretched.	Support noted. Policy LPA08 addresses social infrastructure issues associated with new development.
E1469, Cllrs Banks, Bond & Burns	Building new properties at the higher bandings will increase Council Tax income, which can be spent on essential services to protect the most vulnerable, in a time of politically motivated austerity.	Comment noted
	The numbers are based on detailed and up to date research.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Agree with the windfall allowance, and support the inclusion of a 10% discount capacity and the allocation of Sites HA5 & HA7.	Support noted
	Support policy, however it needs to be more flexible as housing requirements could change for a variety of reasons.	Support and comment noted
	Agree that Alternative Option 1 and 4 should be rejected.	Comment noted
	Support the positive approach to increase the housing requirement above the OAN found in the SHMA, but evidence needs to be robust in this.	Support noted
	Support policy as there is a need to meet the objectively assessed needs of the Borough and presently there is only a 4.8 year supply of land.	Support noted. The LPSD proposals will ensure provision of a 5 year deliverable supply of land.
	Two developers suggest that the policy should be amended to specify when a review of the LP would take place should there be a shortfall in housing.	Comment noted
E1549, Persimmon Homes North West	The housing figures for Billinge and Seneley Green are disproportionately low and fail to reflect population size. It is recommended that the redistribution of the Borough's housing supply should be amended to align with the settlement size of these areas.	The LPSD housing requirements are supported by evidence on local need across the Borough as a whole. Whilst the LPSD focusses development towards key settlements including Billinge there is no requirement for each settlement to take a proportionate share of housing provision.

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie on behalf of Wallace Land Investments	Under-delivery should be dealt with swiftly, suggested amendments: <i>"Where housing delivery is significantly below the anticipated level, reasons for under-delivery will be investigated and a partial or full plan review will be triggered to allocate Safeguarded sites for housing development."</i>	Comment noted. The approach to safeguarded land is in line with national policy which confirms that such land is not allocated for development in advance of a future Local Plan review.
E1556, JLL on behalf of Suttons Group	Linkway Distribution Park is not suitable or viable for continued employment use and should be allocated either as a strategic or a non-strategic housing allocation.	Comment noted. This site is included as an allocation in the LPSD.
LPPO808, Cllr McCauley	Land adjacent to Elephant Lane Thatto Heath should be considered as an alternative (behind the Police Station on Thatto Heath Rd). Following discussions with residents, this site has come forward as a very marketable piece of land that should be included in the Plan.	Comment noted.
E1564, De Pol Associated on behalf of Metacre Ltd.	Green Belt release to meet future housing need is supported. Land to the south of Fleet Lane, Parr, St.Helens should be allocated for residential development in the next 5 years; this site is suitable, available and deliverable.	Comment noted. The LPSD does not however propose to allocate this site for development.
	PiP should be applied if there is sufficient clarity about the process, before the next draft of the Local Plan is published.	Comment noted
E1568, Cassidy + Ashton	It is requested that the table 4.4 is amended to include Land off Elton Head Road, as an individual site within an area of 3.59ha.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1568, Cassidy + Ashton	It is requested that the table includes a revised HS24, which excludes land off Elton Head Road.	Comment noted. The LPO site HS24 is retained in the LPSD, but with a reduced site area.
	A commitment to undertake a future review of the LP on account of the SHELMA and/or a LCR Spatial Framework should be included within Policy LPA05.	Policy LPA05 has been updated but does not include this specific commitment.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Recognise site HA12 is redundant, however the hospital is of significance as a war memorial and any development should be sympathetic and apartment styled.	Comment noted. This site is now proposed to remain in the Green Belt.
	Concerned that the allocated and safeguarded sites have not been rigorously assessed.	The LPSD is based on an updated Green Belt Review (2018) which robustly assesses the sites for potential allocation or safeguarding.
E1488, Historic England)	An opportunity exists for this policy to positively assist with safeguarding the historic environment.	Historic assets are addressed under Policy LPC11.
E1490, Network Rail	Land at Standish Street, the canal and Parr Street should be allocated as a housing site within the Plan.	The LPSD does not specifically allocate these sites (they are smaller than the brownfield sites within the urban area which have been allocated).
E1496, Highways England	It is anticipated that the forthcoming transport evidence base will identify site infrastructure requirements, including deliverability and time constraints, which should inform any need for phasing of development.	Comment noted. This matter will be addressed in Policies LPA04.1, LPA05.1, LPA07 and LPA08.
E1447, West Lancs Council	Note the housing and safeguarded land allocations in Rainford and would request to be kept up-to-date on these sites.	Comment noted

POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1446, Knowsley Council	The creation of 4,000 new homes in the GB will attract developers; we are keen to ensure St.Helens doesn't undermine our own ability of delivering 450 dpa.	There is insufficient land within the current urban areas of the Borough to provide for future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The level of GB release is reduced in the LPSD.
	Site HA8 should not be referenced in the table of safeguarded sites as it creates ambiguity.	Comment noted. However, in accordance with the evidence in the Green Belt Review 2018 this site is now correctly identified as a safeguarded site.
	The Council will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.	The LPSD has been informed by an up-to-date viability study. Deliverability issues are also addressed in the Green Belt Review 2018.
LPPO538, Torus	Pipeline will need to be reviewed regularly to take into account strategic disposals/demolition/conversions by key landlords in the town, i.e. tenure split required may change due to changes to stock profile.	Comment noted
E0224, Rainhill Civic Society	The possible implications of PiP on GB sites should be given more consideration in the Plan.	Comment noted

SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0442, Billinge Chapel End PC	The removal of this land from Green Belt is unjustified - the current approach to Green Belt release will undermine the purpose of preventing urban sprawl. Housing Allocation HA1 is close to two neighbouring authorities (Wigan, West Lancashire). GB reviews should be done with other LPA's collectively.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic/Highway safety - Main Street in Billinge is a congested and dangerous roads - adding additional houses on top of the current and other developments will increase risk of accidents.	See above.
	Access to site is unsuitable - the track from Ash Grove Farm to Main Street is unstable (ditches), too narrow for road and footpath access and is very low lying; Roby Well Way is unsuitable and already used as a 'rat run'.	See above
	Development of the site would only be accessible by a small farm track from either Beacon Road or Ashgrove Crescent, causing major traffic disruption on the already congested Main Street.	See above
	Public Footpaths - there are various long established footpaths and bridleways leading up to the historic Billinge Beacon which will be impacted upon.	See above
	Air quality impact – the development will result in negative impacts on the amenity of existing residents.	See above

SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of this site will result in the loss of high grade agricultural land.	See above
	Public health hazards - the proximity of the proposed development to the former landfill site at Billinge Hill poses concerns regarding potential toxic gases.	See above.
	Impact on landscape – this proposal will lead to the destruction of the Billinge's beauty and visual impact on the views across to/from Billinge Hill and beyond to the Welsh Hills.	See above
	Grade A agricultural land will be lost	See above
E0442, Billinge Chapel End PC	Wildlife/ecology - Site HA1 has a border with a local wildlife site (LWS14) and it is not clear how the conflict between a housing development and the Council's commitment to safeguard this local wildlife site will be addressed.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Wooded Valley at Billinge'.	See above
E0442, Billinge Chapel End PC	Policy LPA09 refers to Billinge Hill as a new nature reserve site, therefore it is disappointing that such a significant and popular site will be adversely affected by Site HA1	See above
	Flood risk - flooding has occurred in Roby Well Way, Elm Drive and Beacon Road which would be further exacerbated by this development.	See above

SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Drainage from new housing on the site will impact on existing water courses or the combined sewer which is at capacity.	See above
	Lack of market interest - not all properties have been sold in the existing development across from Billinge Hospital Site, called The View, which has been built for 2 years.	See above
	Housing development should be extended at site HA2 to include the land opposite as well instead of HA1, as there a train station, a new medical centre and a primary school.	See above
FP0260, Parish Cllr Clift	Infrastructure must be put in first before housing and this particular site is unsuitable for housing due to the leaking of methane gas.	See above

SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA2 is still proposed to be allocated for housing development.

SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm Development	Development of this site will lead to more traffic congestion leading to the East Lancs around the Garswood, Liverpool road area.	Policy LPA07 addresses the issue of traffic impacts from development. This issue has also been considered in the Green Belt Review 2018.
LB0001, Save our Green Belt & Residents against Florida Farm Development	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used. Garswood is already heavily congested and services are not available.	Policies LPA07, LPA09 and LPD09 address the issues of traffic impact, infrastructure and air quality and respectively. These issues have also been considered in the Green Belt Review 2018.
	Flood risk – site is prone to flooding, the water table is already high around this site, and development and climate change will make this issue even worse.	LPSD Policy LPC12 confirms that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. This issue has also been considered in the Green Belt Review 2018.
	Land stability/hazards – bell mines exist below the site, the land has been honeycombed underneath due to historic mine working.	These issues would need to be addressed as part of any development proposal. The Council is not aware of any ground conditions issues which would preclude the site from being developed in principle.
	Housing development in Billinge & Senely Green should be on HA2 instead of HA1, as there a train station, a new medical centre and a primary school.	Comment noted. The relative merits of these 2 sites have been robustly assessed in the Green Belt Review 2018. It is proposed to allocate LPPO site HA2 but not HA1.
E1549 Persimmon Homes Ltd.	Support the removal of this land from the Green Belt and its inclusion although consider it can accommodate circa 270 homes so indicative capacity should be amended accordingly.	Support noted. The site capacity of 216 dwellings given for the site is indicative only and does not preclude a higher capacity if this can be accommodated within a suitable site layout.

SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The release of Green Belt land to meet future identified housing need is unjustified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA3 is still proposed to be allocated for housing development.
	Highways impact - development will increase traffic congestion and worsen existing capacity issues.	Policy LPA07 addresses the issue of traffic impacts from development.
	Increased traffic will further deteriorate local air quality with associated health impacts.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development.
	This site was previously deemed unsuitable for housing; it is not clear what has changed.	The deliverability issues concerning the site are addressed in the Green Belt Review 2018.
	Flood Risk – development of this site and development north of the A580 will increase flood risk at Blackbrook.	Policy LPC12 addresses issues of flood risk and sets criteria to ensure development will not cause an unacceptable risk of flooding on the site or elsewhere. This matter is also addressed in the relevant site profile for the site in the appendices of the LPSD.
	Wildlife/ecology – development of the site will obliterate the old part of Slag Lane which is enjoyed for its country/rural character and habitat for birds.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Detailed guidance will be set out in the Council's review of its Biodiversity Supplementary Planning Document.

SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	The allocation of this site for housing is supported subject to site specific matters including access being agreed. It is considered suitable for GB release as it forms a natural extension to the settlement of Haydock. The A580 forms a distinctive boundary between the site and open countryside.	Support noted

SITE HA4 - LAND EAST OF CHAPEL LANE AND SOUTH OF WALKERS LANE, SUTTON MANOR, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1503, Kingsland Strategic Estates Ltd.	Agree with the release of this site from the Green Belt. The site is well placed to deliver strong and enhanced connections to Greenways and to assist in the delivery of the Bold Forest Park Area Action Plan.	Support noted. However, this site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to change the site from an allocated site to a safeguarded site. This means that it would be removed from the Green Belt but not allocated for development before 2035. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Highways impact - Chapel Lane cannot accommodate heavy goods vehicles and lorries.	Policy LPA07 addresses the issue of traffic impacts from development.
	Highway safety - Chapel Lane is used by regularly by pedestrians (young and old), increased traffic would be very dangerous.	Policy LPA07 addresses the issue of traffic impacts from development.

SITE HA4 - LAND EAST OF CHAPEL LANE AND SOUTH OF WALKERS LANE, SUTTON MANOR, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Heritage impact - development will take place on an historical site with the remains of a 200 year old factory.	Policy LPC11 requires that the historic environment will be preserved and enhanced and that, in relation to non-designated heritage assets, proposals for development will have to identify, assess and preserve those features that are judged to be of value.
	Flood risk/watercourse - there is evidence of historic drainage workings which should also be investigated	Comment noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Pendlebury Brook'.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further guidance will be set out in the St.Helens Biodiversity Supplementary Planning Document.
	Health and wellbeing of elderly residents living in bungalows will be adversely impacted.	Health and Wellbeing issues have been addressed in Policy LPA11 and open space and green infrastructure policies.
	Impact on ecology/wildlife – the site is habitat to a number of species (including toads, buzzards, bats and foxes); the farmland west of Chapel Lane is a Local Wildlife Site.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance are set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Impact on trees – Chapel Lane is lined with trees which carry a Tree Preservation Order.	This is addressed in Policy LPC10.
	Alternative uses for the site should be considered such as an education resource for children to observe wildlife.	Comment noted.

SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	The allocation of HA5 is supported.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA5 is still proposed to be allocated for housing development.
	Highway safety - there is already a great deal of traffic on the B5419 (Jubits Lane and Chester Lane) - a development on this site would increase levels and cause safety issues.	Policy LPA07 addresses the issue of traffic impacts from development.
	Highways impact – increased traffic will lead to increased noise and air pollution	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with the planned development.
	Sutton Manor and Clock Face do not have the local amenities for such a large scale development; there are not enough spaces in local GP's, schools and nurseries to allow for large scale development in the area. The local community centre (Chester Lane) has already been closed.	The LPSD addresses the impact of development on existing infrastructure. Policy LPA08 seeks to ensure satisfactory provision of all forms of infrastructure which are required to serve the needs of the local community'.

SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Bold Forest Park Area Action Plan - allowing development in the Sutton Manor, Clock Face areas would have such a massive detrimental effect on the new plan for the Bold Forest Park. The local area needs an environmental development like this and allowing residential or commercial development would put that in jeopardy and negate any of the benefits to the local area.	Policies LPA09 and LPA04.1 will address the need for the development to be sympathetic to the green infrastructure in the area. Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance will be set out in the St.Helens Biodiversity Supplementary Planning Document.
	Visual impact - the Bold Forest Park with other land from the Forestry Commission makes Sutton Manor a scenic area used by walkers, runners, dog walkers and other clubs. Development will reverse what the Council has worked hard to beautify.	Policy LPC09 addresses the visual impact from new development.
	Flood risk – this field is often water logged and if developed would have drainage issues.	Where sites proposed for Green Belt release contain areas that are a known flood risk the anticipated capacity of the site has been reduced to reflect that constraint. Details of the site assessments are set out in the Green Belt Review 2018. Where there are concerns about surface water drainage issues, the Plan is clear that development will be required to provide the necessary infrastructure and services and proposals that are brought forward that fail to meet that expectation will not be permitted.
	Wildlife/ecology – development would lead to the loss of wild life habitats including birds, frogs, bees, butterflies, newts, hedgehogs – all seen at this site.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.

SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Any funding requested for an access road to the car park area in the adjacent BFP, utility service connections, education and/or off-site highway works will need to comply with the tests set out in the CIL Regulations and Framework.	Support noted. The approach in Policy LPA08 refers to the statutory tests for Section 106 agreements.

SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
		[NB In accordance with the findings of the Green Belt Review 2018, LPPO site HA6 is still proposed to be allocated for housing development and is proposed to form part of a much larger allocation, also incorporating the former LPPO site HS3].
	Landscape impact - trees cover is needed along the boundary of Bold Road from the aesthetic aspect and for noise reduction.	The updated Green Belt Review (2018) has considered the landscape value of the site. Policies LPA04.1 and LPC09 will address the impact of new development on landscape in this site.
	Development will result in the loss of agricultural land (Grades 1-3).	The sites that have been selected as development locations are those that are well-related to the existing built-up areas and that would result in the least unacceptable loss of valuable undeveloped land, including efforts to protect the best and most versatile agricultural land. Data indicates that the site is grade 3. This has been taken into account in the Green Belt Review.

SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0861, Davis Meade on behalf of J. & J. Kay	Change of use from agricultural land will threaten the security tenant farmers.	Comment noted.
	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description (E1585, Bell Ingram Design Ltd. on behalf of Essar Oil).	Comment noted

SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site should not be released from Green Belt - developers may wish to change their planning permissions to commercial development from housing.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA7 is proposed to be replaced with a much smaller site to be safeguarded to meet potential housing needs after 2035, rather than being allocated for development before 2035. The remainder of the site is proposed to remain in the Green Belt. Policy LPA06 confirms that planning permission should not be granted on safeguarded land for uses which would prejudice its future development for the use for which it is safeguarded.

SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways - there are already high levels of HGVs using Vista Road increased development will lead to increased congestion and decreased highway safety; improved measures will be needed on the highways to cope with additional traffic.	LPSD Policy LPA07 addresses the issue of traffic impacts from development.
E1463, Cllr Preston, St.Helens Borough Council - Earlestown Councillor	Development of this site will only cause major traffic problems on the Earlestown roads Vista Rd is grid locked most of the day and people get stuck in traffic trying to leave the High Marsh Estate.	Policy LPA07 addresses the issue of traffic impacts from development.
E1462, Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor	Any development on site HA7 should not include a through route for vehicles of any description so a "rat run" is not created.	Comment noted. Policy LPA07 addresses any transport related impact associated with the development.
E1462, Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor	Need to investigate what lies beneath this area. Many adjacent homes surrounding the site have had to be underpinned, due to a number of faults in the earth below. There are existing mining maps which show these faults. A truck stop should also be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Ground conditions would need to be addressed by the developer if this site is allocated for development in the future. Traffic movement in the area is being considered through the junction 23 study.
	Increased traffic congestion will result in increased air pollution	Policy LPA07 addresses the issue of traffic impacts from development.

SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Fully support the allocation of HA7 for housing although the policy should be amended to recognise that each site should 'contribute' to defined elements of a green gap so that this requirement can be met by either site should the other not be delivered.	Support noted.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site is the only piece of Green Belt left in the area. The Green Belt study's assessment of this site is challenged as it forms a clear strategic gap, and supports an important role in Green Belt purposes. This site should not be allocated at this time.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. This revised approach is in the light of the reduced housing requirement in Policy LPA05. Further reasoning is set out in the Green Belt Review 2018.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There are better brownfield sites near the M62 and Linkway.	The presence of these and other brownfield sites is acknowledged. They can not cumulatively meet the housing development needs of the Borough for the post 2035 period.
E1470, Cllr Haw	Contrary to Strategic Objective 6.2, site HA8 does not “safeguard the quality of the environment”. Housing here will only harm the local environment destroying both biodiversity and geodiversity.	Known biodiversity and geodiversity interests on the site are not sufficient to preclude its development. Policy LPC06 addresses the need to protect biodiversity including wildlife.
	There is insufficient infrastructure to support housing on the site.	Infrastructure issues are addressed in Policy LPA08.
	Increased traffic result in increased traffic and pollution along surrounding roads.	Policies LPA07 and LPD09 address the issues of traffic impact and air quality associated with new development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Existing roads around the site are already inadequate and congested - on road residential parking on Portico Lane only allows for single vehicle progression and is a cause of traffic, especially near the nursery at Portico Lodge; current traffic measures make Two Butt Lane essentially a single vehicle road; on road parking on Holt Lane only allows for single vehicle progression.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Cumulative traffic impacts - the Whiston Garden Village plan will add an additional 4000+ homes plus the 140 homes on the Edmund Arrowsmith school site and 132 homes on the Scotchbarn Lane development which result in additional traffic.	Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Road safety - additional traffic on Longton Lane and Vincent Road will increase risks of accidents.	LPSD Policy LPA07 addresses the issue of traffic impacts from development. The site capacity will be subject to further assessment in the light of highways capacity and other infrastructure issues if the site is allocated for development in a future Local Plan.
	Eccleston Park station lacks sufficient car parking facilities forcing users to park on local roads.	This issue would need to be considered if the site if the site is allocated for development in a future Local Plan.
	Rainhill High School drop off and collection times already cause is a hazard with current traffic levels in the surrounding area.	Comment noted. Policy LPA07 addresses the issue of traffic impacts from development.
	Flood Risk – the site suffers from excessive surface water due to a high water table. Changes in the contours of the land may increase flood risk.	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood Risk - there is an artesian well sourced from the underlying aquifer 4 metres from rear wall of property at 15 Ryder Court that currently managed by the GC that serves to irrigate the course which if no longer used and not properly decommissioned may give potential for rapid flooding of existing properties. Should developers use artesian well as a source of water during construction the phase, this may cause unacceptable impacts on the existing residents.	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.
	Site has flooding issues and there are two large aqueduct pipes under two proposed sites (FP0456 Residents Against The Development Of Green Belt - Rainhill)	Policy LPC 12 addresses the flood risk issues associated with new development. It sets criteria to ensure that any development proposal which may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated.
E1464, Cllr De Asha	The allocation of Site HA8 is objected to due to existing severe traffic problems, air pollution, lack of local services and the proposed Halsnead development on the border. Education provision - Increased population will require larger schools at a cost to the council; local schools e.g. Eccleston Lane Ends Primary, Longton Lane Primary and Rainhill High are already oversubscribed.	Policy LPA07 addresses the issue of traffic impacts from development. Policy LPA08 addresses the impact of development on existing infrastructure. Policy LPA08 also seeks to ensure satisfactory provision of all forms of infrastructure which are required to serve the needs of the local community.
	Building on the golf course will leave no other available land in which to provide additional educational facilities.	This matter could be addressed as part of any future master plan exercise, in the event of the site being allocated for development in a future Local Plan.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	GP surgeries in the area are already oversubscribed with long waiting times.	Policy LPA08 addresses social infrastructure issues.
	The site border is with St Benedict's wood, managed by the Woodlands Trust and both the woodland and wildlife need protecting.	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
	Tree Preservation Orders cover small parts of the site.	Policy LPC10 addresses tree and woodland issues.
	Ecology - bat activity may be impacted by development.	Policy LPC06 requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.
	Pylons across the site may pose a public health risk.	Comment noted. The pylons are insufficiently extensive to preclude development on the site as a whole.
	There is a major national pipework which may be liable for disruption if development occurs.	Comment noted. The known pipework is insufficiently extensive to preclude development on the site as a whole.
	The removal of open space will reduce opportunities for people to exercise, despite government's high priority on public health and wellbeing.	Open space protection, provision and enhancement are addressed in policies LPC05,LPD03, LPC07 and LPA09.
	Heritage - the site is 130m from the Grade 2 listed building Greenhouse Farmhouse and development is too close to conservation area and Manor Farm pub which dates back to 1662.	Policy LPC11 requires the historic environment to be preserved and enhanced.
E1488, Historic England	Site HA8 makes no reference to the nearby listed building despite the SA recommending screening in mitigation.	Heritage issues are addressed under Policy LPC11. This requires the historic environment to be preserved and enhanced.

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	The loss of the golf course must be fully justified.	Comment noted. The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
	The golf club provides revenue and is still well used by both junior and senior members, Blundell Hill Golf Club is too hilly and senior members may have no alternative if Eccleston Park Golf Course is closed.	The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
E1555, Helen Howie on behalf of Wallace Land Investments	HA8 is not deliverable in the Plan period due to issues of highways, flooding, ecology and other site constraints - site HS23 would be a more suitable site for allocation.	Site HA8 is now proposed to be safeguarded to meet potential longer term housing development needs beyond 2035.
	Site HA8 should not be referenced in the table of safeguarded sites as it creates ambiguity.	Site HA8 is now proposed to be safeguarded to meet potential longer term housing development needs beyond 2035.
	Site HS23 is a more suitable site than HA8.	Comment noted. The merits of the 2 sites are assessed in the Green Belt Review 2018.
E1567, Savills on behalf of Crown Golf	Eccleston Park Golf Club will not compromise the purposes of the Green Belt in this location nor affect any other designations of landscape or habitat importance.	Comment noted

SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1567, Savills on behalf of Crown Golf.	Based on evidence within the Golf Course Addendum (June 2016), the loss of Eccleston Park Golf Club to a residential use would not have a detrimental impact on the provision of golf courses and holes in the Borough	Comment noted	
E1567, Savills on behalf of Crown Golf	This site has excellent potential due to its location and accessibility. Identifying HA8 as a strategic allocation creates a logical extension to the settlement boundary.	Support noted	
E1460, Cllr Glover	Support for new build, especially for this part of the area with a high ageing population, however, access for existing traffic is already at breaking point. The pinch point at the junction of Rainhill Road and Warrington Road is unable to accept more traffic. New schools will be needed and a number of resident facilities including a medical centre. It would be desirable to create a buffer of greenery from the new build and Two Butt Lane.	Comments noted. Infrastructure, traffic and green space issues are addressed in other relevant Plan policies.	

SITE HA09 -HIGHER BARROWFIELD FARM, HOUGHTON'S LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Removal of site from the Green Belt is unjustified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the small developable area within the site compared to other site allocations, the site is no longer proposed as a site allocation for housing. However, it is proposed to be identified as a minor change to the Green Belt boundary – see chapter 6 of the Green Belt Review 2018 for further details.
E1507, N. Cliffe	The site serves a limited Green Belt function so should be removed.	Comment noted
E1507, N. Cliffe	The site is available to meet housing demand.	Comment noted.
E1507, N. Cliffe	Residential use of this site would be in common with the adjacent area representing a logical 'infilling'	Comment noted.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Comment noted. Any proposal for development on the site would be subject to the requirements of Policy LPC06. This requires that account be taken of the impact of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Any proposal for development on the site would be subject to the requirements of Policy LPC06. This requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document.

SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Fully support HA10 as a site to be removed from the Green Belt and allocated.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The land represents a sustainable extension to the settlement of Haydock and abuts existing development and major roads to form an accessible housing site that can be fully integrated with the adjacent settlement.	Site is discounted as an allocation.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The site can be a comprehensively master planned to take full account of and retain relevant ecological and landscape features. Pipeline buffer zones can be respected and no flood risk issues arise. As a result, the site is appropriate for allocation for housing.	Site is discounted as an allocation.
	Once removed from the Green Belt developers may wish to change their planning permissions from housing to commercial development.	Site is discounted as an allocation.
	Water supply – the domestic water pressure around the HA10 proposed area already regularly drops below satisfactory levels.	Site is discounted as an allocation.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside)	Local Wildlife Site Ellams Brook runs along the southern perimeter. No adverse impact should be demonstrated.	Site is discounted as an allocation

SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways – Vista Road is already congested with HGVs/lorries, additional traffic will worsen this. Any development between Vista Road and Ashton Road must have traffic measures incorporated into entrance and exit of estate.	Site is discounted as an allocation.
E1457 Cllrs Gomez-Aspron, Bell & Dyer	The proposed buffer zones for site HA10, is considered too small.	Site is discounted as an allocation.
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	Comment noted. Site is discounted as an allocation.

SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	This land should remain as open farm or developed only for housing if developed at all	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Amenity – the quality of lives of new residents will be adversely affected by the noise from the oxygen factory and traffic on the A580.	Site HA11 has been discounted as an allocation.
	Highway safety - the new site will increase traffic to a dangerous level for pedestrians.	Site HA11 has been discounted as an allocation.

SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Issue of health and safety of residents will need addressing - overhead power cables that cross the new site.	Site HA11 has been discounted as an allocation.
SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site is Green Belt so should not be developed.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Recreational use - the site is used by hundreds of people for leisure purposes, this will be lost.	Comment noted. Site HA12 has been discounted as an allocation
E1457 Cllrs Gomez-Aspron, Bell & Dyer	The site is adjacent to SH3 a recognised protected area - the Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley. It is vital that these greenways are protected and not undermined by inconsiderate development.	Comment noted. Site HA12 has been discounted as an allocation.
	HA12 should be removed from the Plan or development confined within the boundary walls of the existing hospital.	Comment noted. Site HA12 has been discounted as an allocation.
	Wildlife/ecology - Trees and birds may be affected.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEIGH ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Old Hey Wood'.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.
	The topography of the site being on a slope will make it expensive to develop.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.
E1548, NHS Property Services	Support the allocation, although the boundary of site should be amended to include land to the south east of the Former Newton Community Hospital, to reflect the extent of land in the NHS ownership and to ensure that the most efficient use of land to be released from the Green Belt.	Support noted. Site HA12 has been discounted as an allocation in the LPSD.
E1548, Nexus Planning	Support the allocation of the site. It is a sustainable location on the edge of an existing urban area with an element of previously developed land. The site would contribute to meeting the local housing needs and provide affordable housing, integrating the development with the wider Sankey Valley. The site has a public footpath running through which would need to be retained and a number of trees that would need to be subject to an arboricultural and ecological assessment. However, the boundary of the site should be amended to take in the full extent of the site in the NHS ownership.	Support and Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1457 Cllrs Gomez-Aspron, Bell & Dyer	It is recognised site HA12 is redundant, however the hospital is of significance as a war memorial and any development should be sympathetic and apartment styled.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD.

SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Object to the allocation of Site HA13, do not consider sufficient evidence to justify its loss.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA13 is still proposed to be allocated for housing development. Whilst the site contains a playing field most of it is a former community home. Any impacts of a proposed housing development on sporting or outdoor recreation facilities should be capable of being addressed under relevant Plan policies.
E1458 Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads - although we do not object to them being allocated for housing.	Support for HA13 for housing delivery is noted. LPSD Policy LPA07 addresses the issue of traffic impacts from development.

SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook.	LPSD Policy LPC06 sets out how international, national and locally designated and non-designated sites must be addressed within any planning application
E1457 Cllrs Gomez-Aspron, Bell & Dyer	It is accepted that this site is a natural extension of the existing estate, however we request that an adequate buffer zone and greenway be protected along Sankey Valley.	Support and comment noted. This buffer can be accommodated within any development.

SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, education, health facilities, public transport, retail outlets.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1456, Rainford PC	The access road to this site is too narrow and no plans have been put in place to cope with the extra traffic and parking.	Comment on access is noted. Site HA14 has been discounted as an allocated site in the LPSD.

SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Randles Brook' runs along the southern perimeter, development should not adversely impact this site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
	Other forms of wildlife have been spotted on the site including Kingfishers and Barn Owls.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
LPPO585, McAteer Associates on behalf of Eccleston Homes Ltd.	Concerned over the capacity of this site due to the relationship of the site to adjacent land uses and the onsite constraints.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
E1459, Cllrs Jones, Mussell & Reynolds	Development here will create further highway congestion at Windle Island. The schools and GP's would need to be extended to cope with the increase in residents and parking is an issue in the village.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.

SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	This is genuine and valid concern over flood risk. The drains are often at full capacity and the increased run-off from developed land needs to be resolved. Boxing Day 2015 saw severe flooding on some of the proposed development sites. Houses in Beech Gardens (near proposed HA 14 Lords Fold development) were inundated. Red Delph was also affected (development site HS19) along with many other properties that were dangerously close to the water line.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD.
E1250, Rainford Action Group	There is a lack of infrastructure, health facilities and public transport in the village and more dwellings would only add to the existing problems. The site is in a flood plain, and the area was flooded in December 2015 with dozens of homes flooded by the brook. Houses in Beech Gardens were inundated and drains are already at full capacity.	Comment noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Strongly support the allocation of this site. Exceptional circumstances for Green Belt release have been demonstrated, and this site should be allocated.	Support noted. However, Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.
E1558 Savills (UK) Ltd. on behalf of The Knowsley Estate	Fully support the allocation of this site	Support noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.

SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1479, Edward Landor Associates	Support the allocations at Rainford, however more land should be allocated in this area as there is a gross under provision here. The two sites proposed do not provide sufficient choice or diversity.	Support noted. Site HA14 has been discounted as an allocated site in the LPSD. The Green Belt Review (2018) provides further information.

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1558, Savills on behalf of The Knowsley Estate	Exceptional circumstances for Green Belt release have been demonstrated, this site should be allocated, however, the number of deliverable units in Table 4.4 should not be a cap but indicative. Site HA15 could yield circa 260 - 280 dwellings at a net developable area of 75%-80% rather than 60%. Unaware of any obvious constraints of the site.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA15 is still proposed to be allocated for housing development. The site capacity stated in the LPSD (259 dwellings) is indicative. It takes account of the need to provide adequate buffer zones adjacent to protected trees and to address flood risk and drainage issues.

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	Lack of infrastructure, health facilities and public transport. The site is located on Grade 1 agricultural land. There are drainage and flooding issues here with drains already at full capacity.	Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities. Whilst data indicates that the site contains grade 1 agricultural land the same is true of many sites in the northern part of the Borough. The evidence does not indicate that flooding issues are sufficiently severe as to preclude the development of the site.
E1456, Rainford PC	Rainford doesn't have the infrastructure to cope with additional homes at sites HA14 & HA15, including highways, education, health facilities, public transport, retail outlets.	LPSD Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure including health, education, open space, cultural, emergency facilities and community facilities.
E1456, Rainford PC	The access road to this site is too narrow and no plans have been put in place to cope with the extra traffic and parking.	Comment noted. traffic and parking issues can be addressed through the measures set out in Policy LPA07.
E1456, Rainford PC	The sites identified consist of Grade 1 agricultural land, which is a high source of employment in the village.	Whilst data indicates that the site contains grade 1 agricultural land the same is true of many sites in the northern part of the Borough. This factor has been taken into account in the Green Belt Review. Some minor changes to the levels and patterns of agricultural employment opportunities may occur over time, but it is considered that the overall impact will be negligible in comparison to other likely alterations to the existing employment patterns in the area.
E1459, Cllrs Jones, Mussell & Reynolds	Development here will create further highway congestion at Windle Island. The schools and GP's would need to be extended to cope with the increase in residents and parking is an issue in the village.	LPSD Policy LPA08 sets out a policy framework for the protection, enhancement and delivery of infrastructure. Policy LPA07 addresses the issue of traffic impacts from development.

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Wildlife has been spotted on the site - migrating Pink Footed Geese use paddocks on site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	Under policy LPD01, any development should be of a high quality which maintains or enhances the character of the local environment.
E1563, Barton Willmore on behalf of Millar Homes	HA15 is available and deliverable within plan period and capacity should be increased to 260	Comment noted. The stated capacity is 259 dwellings in the LPSD.
E1479, Edward Landor Associates	Support the allocations at Rainford, however more land should be allocated in this area as there is a gross under provision here. The two sites proposed do not provide sufficient choice or diversity.	Support noted. The LPSD housing requirements have been objectively assessed to meet housing need across the Borough as a whole. This approach accords with national policy. There is no evidenced need to provide more housing than is proposed in the LPSD in Rainford.
	Support the allocation but delivery should be restricted until the access road from Pasture Lane serving EA10 is fully implemented (E1517, Frost Planning Ltd. on behalf of English Land Ltd.)	Support noted. The delivery of the site is not reliant on access being provided from Pasture Lane. The requested restriction on site phasing has therefore not been included.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Policy LPC06 requires that account be taken of the impact of proposed development on nature conservation interests and is supported by the detailed guidance set out in the St.Helens Biodiversity Supplementary Planning Document (2011).

SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Councillors suggest that this allocated site and site HS19 should be removed and consider land at Ormskirk Road/By-Pass/Dairy Farm Road to be much more suitable as the sites would have better access and would be less intrusive on the village centre.	Comment noted. The LPSD allocations were subject to rigorous assessment in the Green Belt Review 2018. Site HA15 is allocated in accordance with the findings of that Review.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	More evidence is required to ensure that the proposed allocated and safeguarded sites will not have a detrimental impact on the existing biodiversity.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The sites to be removed from the Green Belt have been determined in the light of the findings of the Green Belt Review 2018. LPPO site HA16 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. This revised approach is in the light of the reduced housing requirement in Policy LPA05. Further reasoning is set out in the Green Belt Review 2018.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Housing here will only seek to harm the local environment destroying both biodiversity and geodiversity. The amount of development proposed will double the size of Eccleston, other areas should get their fair share of development.	Policy LPC06 addresses threats to biodiversity and geodiversity in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Surrounding roads are severely congested – Crantock road cannot be accessed; exiting the site along Calderhurst Drive to the junction with Bleak Hill Road will cause traffic chaos.	As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within the Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review. Policy LPA07 addresses the issue of traffic impacts from development.
	Risk of traffic accidents - the junction at the top of Dentons Green is already a dangerous bottle neck for accidents.	See earlier comments. Policy LPA07 addresses the issue of traffic impacts from development.
	Access - surrounding roads are too narrow to service the new development, notably Oak Tree Road and Ecclesfield Road.	Comment noted. Policy LPA07 addresses the issue of traffic impacts from development.
	The development proposed does not contribute to a robust and implementable Travel Plan with no consideration to provide public transport services.	Policy LPA 07 sets out detailed measures to achieve sustainable transport and active travel.
	Two large water mains have been fitted across this field and will require access at all times – these cannot be built upon.	Comment noted. Suitable easements are likely to be required if the site comes forward for development in the future.
	Development will add to the flooding issues in the area. Built a storage tank to release pressure.	Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk/drainage capacity - the sewer pipes for foul water and ground water that will be put into the site are only designed for three times dry weather flow, which means any water in excess goes into Windle Brook, which is already struggling with current flows.	Comment noted. Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.
	Flood risk – there are about Windle Brook Crescent that need considering.	Policy LPC12 sets criteria to ensure that new development does not cause an unacceptable risk of flooding on the site or elsewhere.
	Loss of wildlife/ecology - Houghtons Lane has buzzards, Song Thrush, Corn Bunting, chaffinches, tits, sparrows, owls and hundreds of Canada Geese. Windle Brook is inhabited by water voles which should be protected as it is endangered.	LPSD LPC06 addresses threats to biodiversity and geodiversity in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Windle Brook' (E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside)	Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Development of the site will result in loss of valuable agricultural land.	Data indicates that the site does include high grade agricultural land including some grade 1 land. The quality of agricultural land has been taken into account in the Green Belt Review process. Taking into account other sustainability factors (such as proximity to key services) the quality of agricultural land within the site is not considered sufficient to prevent the identification of the site as safeguarded land.
	There is a well-used footpath crossing the site.	Comment noted.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSPD
	The local schools are already at capacity.	School capacity would need to be considered if the land is to be allocated for development in a future Local Plan. Infrastructure issues (including education) are also addressed in Policy LPA08.
	Developable area - the Green Belt Review states that for sites of over two hectares 75% of the gross area should be developable. Site HA16 is only 60% developable and should therefore be discounted.	Comment noted. LPPO site HA16 is now proposed to be safeguarded to meet potential longer term development needs after 2035. Whilst the developable area within the site is affected by pipelines and other constraints this is not considered to preclude its identification as safeguarded land.
E1558, Savills on behalf of The Knowsley Estate	Fully support the allocation of this site. Exceptional circumstances for Green Belt release have been demonstrated.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1561, Turley on behalf of Story Homes North West Ltd.	Strongly support the conclusion of the Green Belt Review that the Site HA16 is of "low importance" in Green Belt terms. The site is within a sustainable location and natural extension of the urban settlement. The site has good access to the strategic road network. An ecological survey of the Site has concluded that development will not result in the loss of an ecologically diverse habitat.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1561, Turley on behalf of Story Homes North West Ltd.	An area of land adjacent to Windle Brook is identified by the Environment Agency as a flood zone, but this area is excluded from development. Instead it presents an opportunity for recreational and ecological enhancement.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1561, Turley on behalf of Story Homes North West Ltd.	The Site is crossed by a 1200mm water main and a 900mm water main from east to west and is bounded by distribution water mains to the south. United Utilities have confirmed that one of the existing mains positions can be accommodated within the proposed layout and the other can be relocated within the development boundary. The Site is not therefore subject to any significant or insurmountable constraints which would present an obstacle to development.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1609, Liverpool St.Helens FC	Support the allocation as it could have mutual benefits, especially if an access to the north of the East Lancs Road was built into the development. The two rights of way and disused subway could be incorporated within the scheme, with our ground providing the community with a sports facility.	Support noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated.
E1499, Natural England	There is potential impact on European Species (Pink Footed Geese). Any likely significant effects should be assessed at Plan stage and mitigation measures incorporated to ensure the allocation is deliverable.	Policy LPC06 addresses this. It recognises the role played by Biodiversity and Geodiversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments. Policy LPC06 addresses how international, national and locally designated and non-designated sites will be dealt with at the Planning applications stage.

SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1467, Cllrs Glover, Neal & Baines	Agree with the ambitious aims and growth for the Borough but local residents have concerns with the allocated site HA16, in terms of traffic congestion, access, poor public transport and lack of public services.	Comments noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated. Policy LPA07 addresses the issue of traffic impacts from development. It also sets out detailed measures to achieve sustainable transport and active travel. Other public services (education, health etc.) are addressed under Policy LPA08.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Object to the allocation of Site HA8 – the golf addendum does not identify that any golf courses are surplus to requirements, however, it does identify additional capacity to take on new members. There is a lack of evidence to justify its loss.	LPPO site HA8 is now proposed to be removed from the Green Belt but safeguarded to meet potential longer term development needs beyond 2035. The justification for this approach is set out in the Green Belt Review Report(2018). The Council agrees that loss of the former golf course (which existed prior to its closure in 2018) must be fully justified. Safeguarded land is not allocated for development. If the land is to be allocated for development in a future Local Plan, this decision would need to be based on robust evidence indicating that this would be acceptable.
E1555, Helen Howie on behalf of Wallace Land Investments	Object to the allocation of Site HA8 on the grounds of highway, delivery, ecological and flooding issues.	LPPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. Traffic and infrastructure issues are addressed in policies LPA07 and LPA08. Ecology and flooding issues are addressed in policies LPC06 and LPC12 respectively.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1464, Cllr De Asha	Object to the allocation of Site HA8 due to existing severe traffic problems, air pollution, lack of local services and the proposed Halsnead development on the border.	LPO site HA8 is now proposed to be safeguarded to meet potential housing land needs after 2035, instead of being allocated for housing development before 2035. Traffic and infrastructure issues are addressed in policies LPA07 and LPA08. Air quality issues are addressed in Policy LPD09.
E1495, CPRE	Object to the release of GB land for housing and believe exceptional circumstances have not been demonstrated.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1467, Cllrs Glover, Neal & Baines	Concern with the allocation of Site HA16 due to various issues including traffic congestion, access, poor public transport links, lack of public services including health, education and community halls etc. And location would encourage those residents to shop in Liverpool rather than St.Helens.	Comments noted. For reasons set out in the Green Belt Review 2018 the site is now proposed to be safeguarded rather than allocated. Policy LPA07 addresses the issue of traffic impacts from development. It also sets out detailed measures to achieve sustainable transport and active travel. Other public services (education, health etc.) are addressed under Policy LPA08.
	Three developers object to the requirement of delivering energy efficient measures 10% above most up to date Building Regulations, as this is unsound and there is no justification for the requirement, it should be done on a site by site basis.	LPSD Policy LPA05.1 has been revised to require that any planning application for development within a Strategic Housing Site must be informed by an agreed comprehensive masterplan covering the whole Site, which must set out details of measure to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13. This still sets a 10% requirement, subject practicality and feasibility. However, this applies to energy generation rather than energy efficiency.

POLICY LPA05.1 STRATEGIC HOUSING SITES

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Object to requirements for highway improvements – these should only be required as a direct impact from the proposed development and not for existing problems.	Comment noted. The developer contributions requirements set by Policy LPA08 will be subject to the statutory tests including being necessary to make the development acceptable.
	Three developers object to the 25m easement, and consider it should be 15m or less.	Comment noted
E1564, De Pol Associates Ltd. on behalf of Metacre Ltd.	The identified 6 strategic sites will not be able to contribute towards delivery and the five year housing supply, due to constraints and some of the delivery rates are unrealistic.	The LPSD identifies 7 sites as strategic housing sites. The housing supply as a whole will ensure that a 5 year deliverable supply of sites can be maintained from the start of the Plan period.
	Object to the financial contributions, these will be addressed at S106 stage and should not be carried out via policy.	Policy LPA05.1 has been modified and now requires development within Strategic Housing Sites: <i>"subject to compliance with policy LPA08, to provide or make financial contributions towards the provision, expansion and/or enhancement of transport and/or other infrastructure to serve the needs of the development"</i> . This policy requirement is necessary to ensure a comprehensive approach to infrastructure delivery to serve the strategic sites.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	The proposed buffer zones for sites HA7 & HA10, are considered too small. HA7 parcel should be reduced in size.	Comment noted. Within the LPSD, site HA10 has been removed as an allocation. Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs.
E1463, Cllr Preston	Object to the allocation of Site HA7 as this will only cause more major traffic problems.	Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs. Policy LPA07 addresses traffic impacts from development.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Any requests for funding highway infrastructure, education etc. should be done through the CIL regulations and the Framework.	Policies LPA05.1 and LPA08 address infrastructure delivery and funding issues in a manner which complies with national policy and legislation.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Object to the energy efficiency requirements on sites HA5 and HA7 as this is against national policy.	Policy LPA05.1 has been revised to require that any planning application for development within a Strategic Housing Site must be informed by an agreed comprehensive masterplan covering the whole Site, which must set out details of measures to <i>"promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13"</i> . This still sets a 10% requirement, subject practicality and feasibility. However, this applies to energy generation rather than energy efficiency.
	Strongly support the allocation of Site HA14.	Support noted. Site now discounted – see earlier comments.
E1571, Indigo Planning on behalf of Barratt Homes	Support the allocation of Site HA3.	Support noted.
	Fully support the allocation of Site HA16.	Support noted. Site HA16 is now proposed to be safeguarded rather than allocated.
	Support the preparation of masterplan and phasing requirements, however suggest further details of when these should be agreed with the Council.	Support noted. Clause 2 of Policy LPA05.1 requires any planning application for development within a strategic housing site to be supported by a comprehensive master plan.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Fully supports the allocation of HA5 and HA7.	Support noted. Site HA7 has now been reduced in size and is proposed to be safeguarded rather than allocated.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1555, Helen Howie on behalf of Wallace Land Investments.	Site HS23 is a more suitable site than HA8.	Comment noted. The merits of the sites have been addressed in the Green Belt Review 2018.
E1556, JLL on behalf of Suttons Group.	Linkway Distribution Park is not suitable or viable for continued employment use and should be allocated either as a strategic or a non-strategic housing allocation. Site HA3 can deliver 600 units rather than the 502 stated (E1571, Indigo Planning on behalf of Barratt Homes).	Linkway Distribution Park has an extant planning permission for housing and is proposed as a housing allocation in the LPSD.
E1460, Cllr Glover	If HA8 is brought forward there would need to be serious highway improvements, provision of education facilities and new medical centre.	LPPO site HA8 is now proposed to be safeguarded to meet potential development needs after 2035. The justification for this approach is set out in the Green Belt Review (2018).
E1462, Cllr Deakin	In regards to Site HA7 further ground work investigation needs to be undertaken as many properties in the vicinity have had to be underpinned. A truck stop should also be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Site HA7 has been substantially reduced in size and is now proposed to be safeguarded to meet potential post Plan period needs. Ground conditions would need to be addressed in the event of the site coming forward for development in the future.
E1488, Historic England	Necessary that the strategic sites comply with heritage policy and demonstrate that where they would have adverse effects upon the historic environment that it is necessary to achieve public benefits which cannot be met in any other way.	Comment noted. Policy LPC11 requires the historic environment to be preserved and enhanced in accordance with national policy.

POLICY LPA05.1 STRATEGIC HOUSING SITES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Site HA8 for example makes no reference to the nearby listed building despite the SA recommending screening in mitigation.	Comment noted. Historic environment assets were considered as part of the site assessment in the Green Belt Review 2018. This site is now proposed to be safeguarded rather than allocated.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO585, Eccleston Homes	Housing allocations alone will not deliver the number of dwellings stated. Large sites will encounter deliverability issues such as ownership and access constraints.	The LPSD proposes a revised housing requirement and set of allocated sites. The proposed allocated housing and employment sites are suitable and deliverable to meet the objectively assessed needs of the Borough.
LPPO585, Eccleston Homes	Safeguarded Land should be allowed to come forward within the current Plan period if it can be demonstrated that housing needs of the Borough cannot be met through the proposed housing allocations.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Safeguarded Land should be made available to meet any shortfall - this is an essential change required in the Plan.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Seek amendment to the proposed Green Belt boundary change on the proposals map at land North East of J23 of the M6 Haydock.	Comment noted. The boundary of the site has not been extended to the east as requested as this would represent a narrow 'neck' of development protruding into the Green Belt. Other boundary changes have been made to LPO site EA4 as set out in the Green Belt Review 2018. The site is now proposed to be safeguarded rather than allocated.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The Plan does not comply with national planning policy insofar as it does not identify a proper supply of safeguarded land.	The LPSD is aligned with national policies and guidance relating to this point. Sufficient quantities of safeguarded land for employment and housing are identified.
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	The Council must ensure that Policy LPA06 is fully consistent with Policy LPA02 and full regard is had to the implications of the SHELMA.	Comment noted. These policies are consistent in their approach and pay due regard to the SHELMA.
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	There should be a policy trigger for the release of Safeguarded Land.	The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	Object to the proposed changes - Site GBS_054 should also be removed from the GB.	Comment noted. This site (to the north of Rainford) is not proposed to be released from the Green Belt.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1564, De Pol Associates Ltd. on behalf of Metacre Ltd.	Land from Fleet Lane, Parr should be removed (Site GBS_121).	Comment noted. This site is not proposed to be released from the Green Belt.
L0863 Pilkington Sailing Club.	The proposed designation of Eccleston Mere as an Open Space and Recreation Site has not included the associated compound and clubhouse.	Comment noted.
E1457, Cllrs Gomez-Aspron, Bell & Dyer.	Both HS17 and HS14 should incorporate highway schemes that take traffic to the A49 - these engineering solutions should come at the start of the development and not phased.	These sites remain as safeguarded sites in the LPSD. Policy LPA07 addresses the issue of traffic impacts from development.
E1452, Rainhill Parish Council	The Parish Council deplores this Government's changed policy that requires all local councils to assign even more land for development into a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St.Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land across Rainhill.	The LPSD has made adequate provision to meet long term development needs of the Borough up to 2035 and beyond.
E1250, Rainford Action Group	In their own figures, the Council acknowledges there is enough brown field land to support development until 2026, even using their own inflated target. See Appendix 10 to Local Plan Preferred Options showing estimated capacity of 5,062 at 01.04.18. At 570 houses pa that will last nearly 9 years	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs. The LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	15 years of unnecessary green belt land would be released at once and would result in a 'trolley dash' by developers at the expense of brown field land development. St.Helens needs its many brown field sites to be developed. The release of green belt land would make this more difficult. There are no "exceptional circumstances" to justify green belt development. As a minimum, there must be no Green Belt release until the 2021 census proves if the Council's population projections are accurate.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs. The LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1459, Cllrs Jones, Mussell & Reynolds	The Rainford boundary sign reads "scenic and rural" but with the amount of land allocated over both Plan periods the village will turn into a small urban town but without the associated amenities.	Sites HA14 and sites HS18 to 21 inclusive (which were proposed to be released from Green Belt in the LPPO) are now proposed to remain in the Green Belt. Impact of new development on the character of the area would be addressed under Policy LPD01. Infrastructure needs would be addressed under policy LPA08.
E1459, Cllrs Jones, Mussell & Reynolds.	Site HS19 contains a mine shaft and part of the site is subject to flooding despite having had new drainage installed.	Comment noted. Site HS19 is discounted in the LPSD and is therefore proposed to remain in the Green Belt. The Green Belt Review (2018) provides further information.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Site HS18 should also be removed as Safeguarded Land and allocated for residential use in this Plan period.	Site HS18 is discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1572, GVA on behalf of Miller Developments.	Do not agree that Site ES-02 should be Safeguarded Land as it should be allocated within this Plan period in conjunction with Site EA1.	Site ES-02 is discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information
E1495, CPRE	The fact that 65% of St Helen's 136 km2 is Green Belt is a tremendous success and it should be celebrated and protected and we note that the 'exceptional circumstances' test remains, and no more than one or two sites should be released for development at any one time.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1559, DLP Planning Ltd. on behalf of Mr P. Reynolds	Should be amended to show increased figures for Site HS05 and include land at Gorsey Lane (GBS_156) to meet additional housing requirements.	Comment noted. Site HS05 is discounted in the LPSD. The Green Belt Review (2018) provides further information. No additional land is proposed for release from the Green Belt in this area.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Fully support sites EA4 and H10 as sites to be removed from the Green Belt and allocated.	Support noted. Site EA4 is now proposed to be safeguarded rather than allocated. Site H10 has been discounted and is therefore proposed to remain in the Green Belt. The Green Belt Review (2018) provides further information.
E1542, Barton Willmore	This strategy recognises that there is a shortage of available, deliverable and developable brownfield land.	Comment noted
E1563, Barton Willmore on behalf of Millar Homes	Fully supports the positive move taken by the Council to identify areas of Safeguarded Land.	Support noted.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1543, Barton Willmore on behalf of Jones Homes (North West) Ltd.	Generally supportive, however further clarification is required in relation to the circumstances in which the Plan will be reviewed and safeguarded sites are released. Consider that the exceptional circumstances for altering the GB boundaries have been demonstrated.	Support and comment noted. The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
	Two developers support the agreed approach of identifying land and removing it from GB.	Support noted
E1558, Savills (UK) Ltd. on behalf of the Knowsley Estate	Support the deletion of Sites HS09, HS19 and HS21 from Green Belt for safeguarded land.	Support noted. These sites are proposed in the LPSD to remain in the Green Belt.
	Two developers are supportive of 15 years of Safeguarded Land. However suggest the policy needs to build in flexibility to release, or phase the release of reserve sites without a formal plan review.	Support noted. No provision has been made for 'reserve sites' to be identified as there is sufficient contingency in the proposed supply of sites.
E1489, Home Builders Federation	Support policy approach providing all avenues of delivery have been explored then exceptional circumstances can be proved.	Support noted
E1445, Sefton Council	The Council should review the amount of Green Belt land it is releasing in light of the forthcoming Government's response to the Local Plan Expert Group's Report.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1460, Cllr Glover	Although it is a difficult process to clearly outline to our public (the need to reduce our greenbelt), it is the only way to set out our future the way we wish it to be.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage.
E1468, Cllr Long	It is important that land identified as Safeguarded Land is not built upon before it is needed.	Comment noted. The safeguarded sites proposed in the LPSD are required to meet longer term development needs of the Borough beyond 2035. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development.
	Support policy in general, however a buffer of 20% should be applied to the total housing requirement, and the additional land required should come from allocating some of the safeguarded sites.	It is not necessary to add this buffer to the requirement figure as sufficient contingency is built into the supply.
	Support policy, land needs to be released from the Green Belt to deliver the Borough's development needs.	Support noted
E1542, Barton Willmore	The Council must not use the amount of Safeguarded Land identified within this LP as a reason not to provide for sufficient housing land in the next Plan.	The quantum of safeguarded land has been identified to ensure that the new Green Belt boundaries will endure well beyond the end of the Plan period.
E1547, Emery Planning on behalf Wainhomes (North West) Ltd.	Both sites HS17 & HS01 represent logical allocations which would deliver sustainable development and should be brought forward into this plan period.	Site HS01 has been discounted and is proposed to remain in the Green Belt. Site HS17 is proposed to be safeguarded to meet longer term development need in the Borough beyond 2035.

POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Strongly support the removal of Site HS23 from GB, and this site is available sooner, within this Plan period.	Site HS23 has been discounted for allocation in the LPSD. The Green Belt Review (2018) provides further information.
E1559, DLP Planning Ltd. on behalf of Mr. P. Reynolds	Suggest that there should be a Reserve Land Site Policy in the Plan or that this Policy is amended to reference and identify Reserve Land Sites.	Comment noted. No provision has been made for 'reserve sites' to be identified as there is sufficient contingency in the proposed supply of sites.
E1580, Jockey Club Racecourse Ltd.	Brownfield land within the Haydock Racecourse site should be removed from the GB so that future enhancement of the racecourse can be achieved in line with Policy LPA04.	Comment noted. This land is still considered to perform a Green Belt function and is therefore proposed to remain in the Green Belt.
E 0119, Carmel College	Carmel College request that 30% of their estate be removed from Green Belt in order to extend its library provision.	Comment noted
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that Site HS13 is a natural extension of the existing estate, however we request that an adequate buffer zone and greenway be protected along Sankey Valley	Comment noted. Site HS13 has been discounted in the LPSD and is therefore proposed to remain in the Green Belt.
E1470, Cllr Haw	In regard to sites HS08 & HS09, Eccleston cannot cope with any additional development. The recently developed Triplex site has already put an immense strain on the existing infrastructure.	Sites HS08 and HS09 have been discounted in the LPSD and are therefore proposed to remain in the Green Belt.
E1479, Edward Landor Associates	A suitable site which meets the criteria is Rainford Golf Course. It is 1ha and has the capacity for 330 dwellings.	Comment noted. This land is proposed to remain in the Green Belt.

SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site ES01 is proposed to be safeguarded to meet long term employment needs beyond 2035.
	Brownfield land in St.Helens should be developed on first.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes.	Policy LPA07 makes it clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network.
LPPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens	Policy LPA07 makes clear that new development should maintain the safe and efficient flow of traffic on the surrounding highway network.
E1583, Warrington Borough Council	Do not believe the scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62. The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington therefore we do not consider it could contribute to Warrington's future employment land supply.	As the site is safeguarded it is not allocated for development within the Plan period. Policy LPA06 makes it clear that planning permission for the development of the safeguarded sites for the purposes for which they are safeguarded will only be granted following a future Local Plan review that proposes such development. Highways issues would need to be addressed at that time.

SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site would effectively function as part of Warrington and not St.Helens. Residents of Warrington should not have to suffer impacts of a decision made by a neighbouring authority.	Comment noted
E1572, GVA on behalf of Miller Developments	Access to this site can only be obtained via Joy Lane, which is narrow and used by adjoining agricultural holdings and is not suitable for high volumes of traffic or HGV's. This site is not deliverable and should not be considered as safeguarded land or a potential allocation.	The site is still proposed for safeguarding. Further details of the reasons are set out in the Green Belt Review (2018). This sets out robust assessment criteria and justified reasons for it to be safeguarded for employment use.
E0278, Parkside Action Group	The site could be facilitated by Warrington Council in their allocations.	Comment noted.

SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.	Following further consideration site ES-02 has been discounted and is therefore proposed to remain in the Green Belt. Details of the reasons for this are set out in the Green Belt Review (2018).
	Brownfield land in St.Helens should be developed on first.	Comment noted
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site is adjacent to Local Wildlife Site 'Booths Wood'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	Site ES-02 has been discounted. See above.

SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO592, Great Sankey PC	Increasing the load on the road network by developing the Green Belt adjacent to Omega will have a detrimental impact on residents in Great Sankey. Developing this area of land will leave no clear boundary between the local authorities of Warrington and St.Helens.	See above.
	All traffic connections are via Warrington and nothing exists in the St.Helens highway network. All traffic will be through already heavily congested local distributor routes.	See above.
	Site would not effectively function as part of Warrington and not St.Helens - residents of Warrington should not have to suffer impacts of decision made by neighbouring authority.	See above.
E0278, Parkside Action Group	The site could be facilitated by Warrington Council in their allocations.	See above.
E1583, Warrington Borough Council	Do not believe the scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62. The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington therefore we do not consider it could contribute to Warrington's future employment land supply.	See above.
E1572, GVA on behalf of Miller Developments	Consider this site should come forward as an allocation in order to design a layout which connects well to surrounding phases, in particular EA1.	See above.

SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LB0001, Save our Green Belt & Residents against Florida Farm	Sites HA2 & HS01 would cause too much traffic congestion just trying to get out of Garswood, and give rise to noise/air pollution. Better brownfield sites could be used.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	See above
LB0001, Save our Green Belt & Residents against Florida Farm Development	Development of this site will lead to more traffic congestion leading to the East Lancs around Garswood and Liverpool Road.	See above
	Flooding – drainage is poor and the site is prone to flooding in wet weather making it unsuitable for housing development.	See above
	Soil contamination – a previous proposal for a football training area was rejected because of land contamination.	See above
	Land instability/hazards – this land was subject to historic mine workings, there is a bell pit under site	See above
	Alternative uses are more appropriate - this area should be left for the welfare of horses, whilst the bottom part of the site could be turned into a station car park to relieve parking in surrounding area.	See above

SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Agree that exceptional circumstances for altering the Green Belt boundaries have been demonstrated. However, we consider this site represents a logical allocation which would deliver sustainable development in this plan period. The site would provide affordable housing and would consist of a comprehensive landscaping plan including existing features such as trees, together with contributions to local infrastructure.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	As part of any planning application a survey would be carried out to look for badgers, great crested newts and birds would be carried out. There are no major ecological constraints to the development of the site.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	There are no fundamental arboricultural constraints to the development of the site, the eastern boundary hedgerow maybe retained and restocked in order to plug gaps.	See above
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	There are no obstacles to the delivery of this site from a transport and highways perspective, there are a number of potential access points into the site.	See above

SITE HS02 - LAND SOUTH OF LEYLAND GREEN ROAD, NORTH OF BILLINGE ROAD AND EAST OF GARSWOOD ROAD, GARSWOOD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO19, MWA on behalf of J Murphy and Sons Ltd.	This is a logical extension and complementary to the allocated site.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site HS02 is proposed to be safeguarded to meet long term housing needs beyond 2035.
	Flood risk – the site is prone to flooding.	Policy LPC12 contains criteria to ensure that new development will not cause an unacceptable risk of flooding.
	Land stability/hazards – the site has been honeycombed underneath due to mine working from Blackleyhurst Colliery, clay pits and Garners Old Mines.	Ground stability issues would need to be addressed if the site were to be proposed for development in the future.
	Infrastructure - Water and gas mains run through site.	Comment noted. The Council is not aware that this would preclude the principle of development in this location.
LPPO19, MWA on behalf of J Murphy and Sons Ltd.	Support the safeguarded allocation of this site.	Support noted
1549, Persimmon Homes (North West)	Support the identification of this site. It is considered that the site is a logical and sustainable development site which can deliver housing early in the Plan period.	Support noted. There is no need for the site to be brought forward as an allocation in the Plan period, particularly in view of the reduced housing requirement.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1427, Residents of French Fields	The development will lead to merger of settlements; the conclusion drawn from the Green Belt review this site should be removed from the Green Belt is unjustified.	<p>There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. The loss of Green Belt land has been reduced compared to that proposed at Preferred Options stage. However, the Bold Garden Suburb is now proposed to be brought forward as a site allocation rather than to be designated as safeguarded land. The site has been merged with LPPO site HA6.</p> <p>It is anticipated that the overall development of the combined LPPO sites HA6 and HS03 will deliver nearly 3,000 dwellings including 480 to be delivered before 2035. Under Policy LPA05.1, a comprehensive master plan will be required to guide the development of the site.</p> <p>Further details of the reasons for the proposed approach are set out in the Green Belt Review 2018.</p>
	Access - Gorsey Lane is already dangerous and unable to cope with such scale of proposed development.	Policy LPA07 makes it clear that new development should maintain <i>"the safe and efficient flow of traffic on the surrounding highway network."</i>
	Noise and pollution from vehicles are already bad, additional traffic would make this worse.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with the planned development.
	Development of this land will result in the loss of valuable farmland which contributes to the British economy.	Data indicates that the site contains grade 3 agricultural land. Whilst the loss of this land is acknowledged this has been taken into account in the Green Belt Review.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0861, Davis Meade on behalf of J. & J. Kay	Change of use form agricultural land will of will threaten the security tenant farmers; flood risk - There is considerable gradient sloping towards Bold Road that causes surface flooding, development floodwater could enter the estate opposite.	Data indicates that the site contains grade 3 agricultural land. Whilst the loss of this land is acknowledged this has been taken into account in the Green Belt Review. Flooding issues are addressed in Policy LPC12, which sets criteria to ensure that development does not cause an unacceptable risk of flooding.
E1427, Residents of French Fields	Flood risk – significant development involving hard landscaping would increase flood risk for new and existing properties and surrounding road networks. Mitigation drainage issue would need to be addressed.	Flooding issues are addressed in Policy LPC12, which sets criteria to ensure that development does not cause an unacceptable risk of flooding.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site overlaps Local Wildlife Site 'Field North of Gorsey Lane LNR'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. Further, detailed guidance is set out in the St.Helens Biodiversity Supplementary Planning Document (2011).
	Development would lead to impacts on ecology, habitats and biodiversity – there is a Local Wildlife Site present and Priority Species (Skylark and Lapwing) have been witnessed.	Policy LPC06 acknowledges the important role played by biodiversity and geo-diversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments. Policy LPC06 addresses how international, national and locally designated and non-designated sites will be dealt with at the planning applications stage.
	Access to open space will be lost – public rights of way/footpaths cross the site. This will impact on people's health and wellbeing.	Comment noted. Public rights of way will need to be addressed in the master planning of the site.

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Existing infrastructure (roads and services) will be unable to cope	Policy LPA08 requires, where appropriate, developer contributions to fund necessary improvements including transport network.
	Electricity pylons cross part of the site	Comment noted
	Visual impact- trees would need to be planted along Bold Road to mitigate visual impact and road noise.	LPSD Policy LPC10 addresses tree and woodland issues associated with the site. This would also need to be addressed as part of the master planning of the site.
	As an alternative the northern part of this site could be examined separately for consideration as safeguarded land leaving the remainder in Green Belt.	Comment noted. The whole site is removed from the Green Belt. The Green Belt Review 2018 sets out reasons for the proposed approach.
E1554, Barton Willmore	Support the inclusion of land at Travers Farm, Bold which could accommodate 630 residential units.	Support noted
E1542, Barton Willmore on behalf of Andrew Cotton	The site is located in a sustainable area with good accessibility to nearby services and facilities. There are limited constraints near to or within the site which would prevent the site's development for housing. A single masterplan will enable the provision of better connections through the area, which currently lacks integration.	Support noted
E1542, Barton Willmore on behalf of Andrew Cotton	The site lies well connected with the existing urban area and relates more closely to the Council's land included in site HA06, and would request the site is promoted as a single site through the Green Belt assessment.	Comment noted

SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey	Strongly support the identification of this site, but consider it to be deliverable and as such should be allocated for housing now. The Council should allocate it as a Strategic Housing Allocation or at least a reserve site.	Support noted.

SITE HS04 - LAND NORTH OF BELL LANE AND SOUTH-WEST OF MILTON STREET, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1504, Bell Lane Plot Owners.	The land's inclusion is supported but it should be brought forward as an allocated site rather than safeguarded as this site is deliverable.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	to encourage leisure and ecological uses a connection from Dream through this safeguarded site should be considered.	See above.

SITE HS05 - LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways impact/safety - development of this site would generate additional traffic adding to existing problems on local roads especially during school drop-off.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Loss of open space - recently restored green areas of open space will now be lost to development.	See above
	Landscape impact – the semi-rural nature of this area will be permanently lost.	See above
	Wildlife/ecology – development would have a detrimental impact the habitats of species including birds, butterflies, rabbits and frogs.	See above
	Flood risk - this land is prone to flooding as a result of former mine working making it unsuitable for development.	See above
	Mining legacy – former historic and unrecorded mine workings/shafts are known to be present in this area.	See above
E1559, DLP Planning Ltd. on behalf of Philip Reynolds	This site is capable of coming forward within this Plan period and should be allocated as such. It can also yield more house numbers than that suggested in Table 4.8.	See above

SITE HS05 - LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1559, DLP Planning Ltd. on behalf of Philip Reynolds	The site offers a number of access points and lies within a good distance for facilities and services, with good public transport links. There are opportunities within the site for additional landscaping and buffering, and lies within Flood Zone 1 with no known drainage constraints.	See above

SITE HS06 LAND OFF COMMON ROAD/SWAN ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1466, Cllr Sims	Concern over the amount of development being proposed in Earlestown including this site, all proposed sites should be fully appraised.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Development will lead to additional traffic – roads are already congested.	See above
	Traffic congestion will lead to worsening air quality.	See above

SITE HS06 LAND OFF COMMON ROAD/SWAN ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	The Trust could not identify this site on either of the screening documents so have assumed that it could be allocated. The site is adjacent to Local Wildlife Site 'The Dingle'. In the absence of any information as to how this wildlife site will be protected the Trust objects to it being allocated on the basis that its development is likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS.	See above
E1544, How Planning on behalf of Taylor Wimpey UK Ltd.	Support the allocation of the site, however it should be an allocated site within this Plan period and not as a safeguarded site. If the site is not amended to be an allocation then the site boundary should be extended to the entire 6.1ha.	See above
E1509, Nathaniel Lichfield & Partners on behalf of Taylor Wimpey UK Ltd.	Welcome the provision of this safeguarded site.	See above
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the North West Ethylene pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	See above

SITE HS07 - LAND BETWEEN ASHTON ROAD AND M6, EARLESTOWN, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Inadequate highway infrastructure - Ashton Road suffers from heavy congestion with traffic heading to/from the motorway. This is worst at peak times when day starts and ends at Hope Academy.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1466, Cllr Sims	Concern over the amount of development being proposed in Earlestown including this site, all proposed sites should be fully appraised.	See above
	Air quality will worsen along Ashton Road as a result of increased traffic generated by the new housing development.	See above
	Increased traffic will lead to highway safety issues near Hope Academy/Selwyn Jones sports centre.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The Trust notes that this site has been shown as partially safeguarded. Local Wildlife Site 'Ellams Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to impact a designated Local Wildlife Site. Water Voles were confirmed in 2011.	See above

SITE HS08 - LAND SOUTH OF BURROWS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1470, Cllr Haw	Eccleston cannot cope with any additional development. Recent development has already put a strain on the existing infrastructure. Development will add to the flooding issues in the area which UU have already built a storage tank to release pressure.	See above
	The proposed Green Belt boundary should not exclude the boathouse, dinghy compound and car park at Eccleston Mere (L0863 & LPO544, Pilkington Sailing Club)	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Eccleston Mere'.	See above
	Loss of wildlife – a land survey conducted by Manchester Met University identified a number of birds and mammals on this site, three of which are RSPB red status: Yellowhammer, Skylark, grass hopper and warbles.	See above
E1446, Knowsley Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowsley residents and businesses	See above

SITE HS08 - LAND SOUTH OF BURROWS LANE, ECCLESTON

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support the allocation of this site which is capable of delivering between 185 and 215 dwellings rather than the 131 indicated and measures 8.3Ha.	See above
E1560, Pegasus Group on behalf of Redrow Homes North West.	The site should be considered as an allocated site rather than a safeguarded.	See above
E1560, Pegasus Group on behalf of Redrow Homes North West	There is sufficient capacity and opportunity within the site to provide a robust landscape and Green Infrastructure strategy. The site is considered sustainable and in close proximity to existing services. The site lies within Flood Zone 1 and there are no known physical constraints preventing development.	See above

SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The need for removal of this site from Green Belt and its allocation for housing has not been justified.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	This site is under Natural England High Level stewardship scheme and should be protected from development in order to protect wildlife.	As above
E1470, Cllr Haw	Eccleston cannot cope with any additional development. Recent development has already put a strain on the existing infrastructure. Development will add to the flooding issues in the area which UU have already built a storage tank to release pressure.	As above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Eccleston Mere'.	As above
	Infrastructure – a new water main has already been repaired twice, any new developments will make it even more liable for damage.	As above
E1446, Knowlsey Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowsley residents and businesses.	As above
E1558, Savills (UK) Ltd. on behalf of the Knowsley Estate	Support the deletion of this site from Green Belt and its allocation as Safeguarded land.	As above

SITE HS10 - LAND SOUTH OF FORMER CENTRAL WORKS, BELLEROPHON WAY, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on designated Local Wildlife Site 'Clough Wood and Grassland'.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1575, DPP Planning on behalf of Tesco Stores Ltd.	This site should be released from Green Belt for housing development but should be allocated instead of safeguarded as it is in sustainable location and would be available and deliverable within the Plan period.	As above
E1483, Dickman Associates Ltd. on behalf of the Legh Trust	Support the allocation of this site however it should be allocated for housing in this Plan period. The site is well screened by established woods as well as a watercourse which would be retained.	As above

SITE HS11 - LAND SOUTH OF STATION ROAD, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site 'Clough Wood and Grassland'.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Site HS11 should be a housing allocation and not a safeguarded site.	As above

SITE HS11 - LAND SOUTH OF STATION ROAD, HAYDOCK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO585, McAteer Associates Ltd. on behalf of Eccleston Homes Ltd.	Support the identification of this site but it should not be safeguarded given that the land is capable of delivery within the next two years. The Green Belt Assessment does not properly reflect the site's deliverability or advancement in comparison to allocated housing sites.	As above.

SITE HS12 - LAND AT MARTINDALE ROAD, CARR MILL, MOSS BANK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Increased traffic generated from development will increase vehicle pollution particularly at Moss Bank Road, Carr Mill Road, Martindale Road and Birchley Road.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Access via Moss Bank Road or Martindale Road will give rise to highway safety issues. Moss Bank road has a 3 tonne weigh limit.	As above.
	Elevations on this site may give rise to viability issues affecting the delivery of affordable housing.	As above.
	The site is habitat to numerous species of wildlife which will be lost to development.	As above.

SITE HS12 - LAND AT MARTINDALE ROAD, CARR MILL, MOSS BANK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1585, Bell Ingram Design Ltd. on behalf of Essar Oil	We wish to draw your attention to the proximity of the pipeline route to this site. It may be helpful to show the pipeline route on your proposals map or alternatively make reference to it in the site description.	As above.

SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site is Green Belt and should not be developed.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic impact and air quality - there will be a large increase in traffic on the only access route which runs through Tyrer Road an existing estate.	As above
E1457, Cllrs Gomez-Aspron, Bell & Dyer	The Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley. It is vital that these greenways are protected and not undermined by inconsiderate development.	As above

SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1458, Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads.	As above
	There will be only one access route into the development.	As above
	Will lead to over development - there is already a large development of houses on the Tyrer road.	As above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook'.	As above
	Newton Ward has already had its fair share of new housing built to date.	As above
	There will be a lack of amenities such as places in Schools and Doctors surgeries for this large development of houses.	As above
E1458, Winwick PC	Do not object to the site being allocated for housing.	As above
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that this site is a natural extension of the existing housing estate, however we request that an adequate buffer zone and greenway be protected along the Sankey Valley.	As above.

SITE HS14 - LAND EAST OF NEWLANDS GRANGE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There is already a 'large' development of houses on the Vulcan Estate which is adjacent to this site. Newton Ward has already had its fair share of new housing built to date.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to safeguard the site but with a reduced site size. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Traffic impact - there will be large increase in traffic on the only access route which run through the new Vulcan Estate.	Traffic impact issues will be addressed under Policy LPA07.
E1458, Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads	Traffic impact issues will be addressed under Policy LPA07. The site has also been reduced in size.
	Access - there will be only one access into the development. Over development - there is already a 'large' development of houses on the Vulcan Estate which is adjacent to this site. Newton Ward has already had its fair share of new housing built to date.	Traffic impact issues will be addressed under Policy LPA07. The site has also been reduced in size.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside.	The site overlaps Local Wildlife Site Newton Brook. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	Wildlife issues would be addressed under Policy LPC06.
	Lack of amenities - there will be a lack of amenities such as places in Schools, Doctors surgeries for this large development of houses.	Infrastructure issues would be addressed under Policy LPA08 in the event of the site coming forward for development.

SITE HS14 - LAND EAST OF NEWLANDS GRANGE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Loss of playing field - the loss of the Vulcan playing field which is an important green space and will impact on the quality of life and health for the residents of the Vulcan Village.	The reduced site area will exclude this playing field.
E1610, Wargrave Big Local	As an alternative Wargrave Big Local would welcome the opportunity to develop the Vulcan playing field as Community Allotments, we have the funding available to do this and it would greatly benefit the area of Wargrave and its residents.	The reduced site area will exclude this playing field.
E1458, Winwick PC	Do not object to the site being allocated for housing.	Comment noted.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	The site is suitable, available and deliverable within the first half of the Plan period so should be designated as an allocation rather than a safeguarded site.	Comment noted. There is no need for the site to be allocated for housing during the Plan period. The reasons why the site is safeguarded are set out in the Green Belt Review 2018.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Site HS14 should incorporate highway schemes that take traffic to the A49, these engineering solutions should come at the start of the development and not phased.	Highways issues would be addressed under Policy LPA07.

SITE HS15 - LAND EAST OF ROB LANE AND REAR OF CASTLE HILL, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk – the site is near to Newton Lake meaning ground is boggy and provides much needed flood plains when there is heavy rain.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	These fields are used by the local community daily as an area of natural beauty and for walking.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The site is adjacent to Local Wildlife Site 'Newton Brook, Newton Lake and Southern Woodland'. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS.	See above
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Support the designation of this site but to allow for flexibility and adapt to rapid change this site should be brought forward sooner. As the site has a strong boundary with the M6 it is recognised the need for noise attenuation to the motorway, and as such the boundary should change and include land in the entire ownership of our clients to ensure a barrier is part of the scheme.	See above

SITE HS15 - LAND EAST OF ROB LANE AND REAR OF CASTLE HILL, NEWTON-LE-WILLOWS			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Accept that this site is a natural extension of the existing housing estate, however, it seems extreme to extend to the public rights of way, request that a buffer zone be incorporated within the site	See above	

SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
	Flood risk – the site is near to Newton Lake meaning ground is boggy and provides much needed flood plains when there is heavy rain.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.	
	These fields are used by the local community daily as an area of natural beauty and for walking	See above	
	The site should be removed from the Green Belt but should be changed from Safeguarded to Allocated as site is viable now.	See above	

SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Support the designation of this site but to allow for flexibility and adapt to rapid change this site should be brought forward sooner. As the site has a strong boundary with the M6 it is recognised the need for noise attenuation to the motorway, and as such the boundary should change and include land in the entire ownership of our clients to ensure a barrier is part of the scheme.	See above

SITE HS17 - LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Site is Green Belt and should not be developed.	There is insufficient land within the current urban areas of the Borough to provide for its future development land needs and the LPSD therefore makes provision for some sites to be released from the Green Belt. Site HS17 is proposed to be safeguarded to meet long term housing needs beyond 2035. The reasons for this are set out in the Green Belt Review 2018.
E1458 Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads - although we do not object to them being allocated for housing.	Comment noted. Traffic issues would be addressed under Policy LPA07.

SITE HS17 - LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Newton Brook	Comment noted. Wildlife issues would be addressed under Policy LPC06.
E1547, Emery Planning on behalf of Wainhomes (North West) Ltd.	Agree that exceptional circumstances for altering the Green Belt boundaries have been demonstrated. However, we consider this site represents a logical allocation which would deliver sustainable development in this plan period.	Support noted. There is no need to bring the site forward for development within the Plan period.
E1458 Winwick PC	Although concerned with highway congestion we do not object to the site being included for housing.	Traffic issues would be addressed under Policy LPA07.
E1457, Cllrs Gomez-Aspron, Bell & Dyer	Site HS17 should incorporate highway schemes that take traffic to the A49, these engineering solutions should come at the start of the development and not phased.	Comment noted. Traffic issues would be addressed under Policy LPA07.

SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Flood risk - development will remove natural flood defence.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highway safety - roads are too narrow, access onto Muncaster Drive is dangerous (previous proposal was rejected planning permission as the access road at Muncaster Drive and Higher Lane Junction was deemed too dangerous).	See above
	Will result in loss of Grade 1 Agricultural Land.	See above
E0584, J Rosbottom	The site is located on prime agricultural land and has been in an Environmental Scheme, with NE funding, for 16 years with positive results.	See above
	Land is elevated - would impact on rural character as seen when entering the village.	See above
	Site is not enclosed and lacks strong boundaries to the north and east.	See above
E0584, J Rosbottom	The site has a high risk of flooding due to the gradient of the land and heavy rainfall running down quickly with restricted drains in Rookery Drive. Rainford as a whole has a high water table with an underground lake beneath it.	See above
E0584, J Rosbottom	The site is surrounded by working farms which will cause disturbance in the summer months through noise, humidity and dust.	See above
	Creating access would result in loss of historic stone wall, mature trees and hedgerows.	See above
	Wildlife/biodiversity - site is of importance for endangered Brown Hare and bird species including Pink Footed Geese.	See above

SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1456, Rainford PC	The site is prone to flooding.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	There are serious flooding issues with this site with water soaking in off the brow.	See above
E1497, National Farmers Union (NFU)	The site should be re-assessed and genuine farmland performances such as food production, conservation, flood risk reduction, education and leisure purposes should be taken into account. Sites of less importance and not Grade 1 farmland should be considered first.	See above
E1497, National Farmers Union (NFU)	This site has been in an Environmental Scheme, with NE funding, for 16 years with positive results. Payment similar to this has been made from the public purse to many farmers.	See above

SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1497, National Farmers Union (NFU)	Many endangered birds use this site which is an important step for St.Helens' biodiversity. Education trips have been carried out for the last 26 years.	See above
E1497, National Farmers Union (NFU)	This site experiences flooding and development will only compound this issue, putting any development at risk. There are also highway issues in Rainford with a lack of parking in the village centre.	See above
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
	This site should be removed as Safeguarded Land and allocated for residential use in this Plan period (E1562, Barton Willmore on behalf of Church Commissioners for England).	See above

SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Willmore on behalf of Church Commissioners for England	The site falls in Flood Zone 1 and does not contain any Tree Preservation Orders or areas of high landscape value. The site has no ground or land contamination issues and is located in close proximity to a number of local facilities including bus and rail connections, education and healthcare facilities.	See above
E0584, J Rosbottom	Agree with the ward Councillors that land at Ormskirk Road/By-Pass/Dairy Farm Road would be much more suitable as the sites would have better access and would be less intrusive on the village centre.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Bushy Lane is too narrow an unable to cope with additional traffic.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Drainage issues are known - the site floods each year despite new drainage.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	This site contains a mine shaft and part of the site is subject to flooding despite having had new drainage installed.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
E1456, Rainford PC.	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
	Wildlife loss - migrating birds use the woods.	See above
	The Rainford by-pass/Bushey Lane roundabout is congested and dangerous.	See above

SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site could be converted into a park/dog walking area.	See above
E1484, PWA Planning on behalf of Mr L. Martin	The site is unsustainable with residents being reliant on cars due to the isolated location of the site. Significant infrastructure improvements would need to be carried out before the site would be considered sustainable. Access to the site would be difficult. The site does not represent a logical extension to the existing residential area. The site could not offer any meaningful green space/green infrastructure, leading to developer contribution elsewhere. The allocation is not consistent with paragraph 80 of the NPPF.	See above
E1558, Savills on behalf of The Knowsley Estate	Approve of meeting development needs after 2033 and deletion of this land from the Green Belt for safeguarded land is supported.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Councillors suggest that this allocated site and site HA15 should be removed and consider land at Ormskirk Road/By-Pass/Dairy Farm Road to be much more suitable as the sites would have better access and would be less intrusive on the village centre.	See above

SITE HS20 - LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	Development is inappropriate for Rainford and destroy its rural character.	See above
	Hazards - coal shafts and walk in tunnels exist on the site.	See above
	Flood risk - the site is prone to flooding (as in December 2015), increased surface water will worsen this Highways impact - roads are already congested including Rookery Lane, Higher Lane and Mill Lane.	See above
	Local equestrian business at Holiday Moss will be affected.	See above
L0228, Rainford Heritage Society	This new housing site will have a detrimental impact on the heritage walks around Rainford and bring the parish closer to the surrounding parishes.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above

SITE HS20 - LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Rainford appears to have more than its "fair share" of safeguarded Land for the second Plan period. Further development will add to the existing highway problems. Both health and education facilities will have to be extended, and parking is a big issue in the village due to limited spaces.	See above
E1508, PWA Planning on behalf of JMB Farming	Integration with the surrounding area is considered to be largely achievable for this site considering its proximity to the existing settlement area and location adjoining other land also designated for significant residential development.	See above
E1508, PWA Planning on behalf of JMB Farming	Site HS20 is an extremely suitable site and should be removed as a safeguarded site and become an allocation for this Plan period.	See above

SITE HS20 - LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1508, PWA Planning on behalf of JMB Farming	It is an accessible site in terms of shops and transport; well contained visually as would adjoin Site HA15; is in Flood Zone 1; and support further improvements to public transport and highway improvements.	See above
E1508, PWA Planning on behalf of JMB Farming	Although agricultural land farmed presently, the landowner's farm more extensive areas within the local area and its loss would not give rise to any significant effects on the viability of the agricultural unit.	See above
E1508, PWA Planning on behalf of JMB Farming	This is a sustainable site thus should be an allocation within this plan period rather than the next.	See above

SITE HS21 - LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Will result in loss of Grade 1 Agricultural Land.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
	The site is in area of known flood risk	See above
	Wildlife - migrating birds use the woods and Read Squirrels are present.	See above

SITE HS21 - LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Highways - roads surrounding site are too narrow.	See above
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Rainford Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	See above
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	Rainford appears to have more than its "fair share" of safeguarded Land for the second Plan period. Further development will add to the existing highway problems. Both health and education facilities will have to be extended, and parking is a big issue in the village due to limited spaces.	See above
E1250, Rainford Action Group	Development will cause the loss of Grade 1 Agricultural land. There are various issues that this site would exacerbate including road congestion, poor public transport, lack of medical facilities and public services. There are flooding issues on this site and it would cause the loss of a natural habitat for wildlife.	See above
E1459, Cllrs Jones, Mussell & Reynolds	Serious flooding issues with HS18 site, with water soaking in off the brow.	See above

SITE HS21 - LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC	Rainford does not have the infrastructure to cope with the additional housing proposed on this site, including highways, health and education facilities, lack of retail outlets and parking, and poor public transport. Much of the land is also prone to flooding.	See above
E1456, Rainford PC	The site consists of Grade 1 agricultural land and there is no provision for lost farming which is a high source of employment for people in the Borough.	See above
E1517, Frost Planning on behalf of English Land Ltd.	Site should be allocated to a Mixed-Use Employment/Housing Allocation for immediate release to help meet employment/housing needs and unlock the delivery of EA10.	See above
E1558, Savills on behalf of The Knowsley Estate	This site is available and deliverable in the Plan period so should be allocated for housing in this period, rather than identified as 'Safeguarded Land'. However disagree that the boundary appears to follow a flood risk boundary - this doesn't comply with the requirements of the NPPF.	See above
E1563, Barton Willmore on behalf of Millar Homes	Fully support the allocation of this land, however disagree with the site capacity, which should be 240 dwellings for this site.	See above

SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of this site will start the merger of settlements contrary to Green Belt objectives.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1468, Cllr Long	Local residents are concerned over the negative impact new development will have on the existing highways and local services.	See above.
E1460, Cllr Glover	Site HS22 - this Phase 2 protected housing area will have the same issues on amenity and education and highways as Site HA8. Exiting traffic will have to use Elton Head Road as Rainhill Road into the village is not acceptable.	See above.
E0224, Rainhill Civic Society	Development of this site would lead to further highway problems. Safeguarded land should not come forward unless the Local Plan is further reviewed.	See above.
E1452, Rainhill Parish Council	We share local residents concerns that the proposal will lead to additional traffic congestion, a problem intensified should the High School extend, leading to detrimental highway safety. There will be an increase on education and health wellbeing facilities which will exacerbate existing health problems for residents.	See above.
E1400 Parish Cllr Long	Residents have strong concerns regarding the lack of infrastructure, and the pressure new development will have on the highways, education and health facilities.	See above.

SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Large aqueducts run under the site, it is uncertain if these were laid to withstand development above.	See above.
	Electricity pylons on the site pose a public health risk.	See above.
	Development will worsen traffic Rainhill High School drop off and collection times is already hazard with current traffic levels.	See above.
	Access to the site is restricted – there are issues with on road residential parking near The Coach & Horses Inn on Ritherup Lane and Tasker Terrace.	See above.
	Increased traffic will worsen congestion on Rainhill Road, Elton Head Road, St.Helens Linkway, Field Way, Gardeners Way, Roby Close, Ritherup Lane, Elderswood Road, Ellaby Road and Ansdell Villas Road.	See above.
	The Elton Head Road/St.Helens Linkway Junction exceed government air pollution levels for the past four consecutive years. It will also need expansion to cope with increased traffic.	See above.
	Local primary schools are fully subscribed.	See above.
	Ecology/wildlife - are at risk losing their habitat is lost including endangered species of bees, bats, owls, hedgehogs and Skylarks.	See above.

SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	It should be demonstrated that there will be no adverse impact on Local Wildlife Site 'Pendlebury Brook'.	See above.
	Heritage impact - the site is close to the protected Bournes Tunnel and St Anne's Well.	See above.
	Flood risk - The Environment Agency Flood Zone map shows part of the site (around 15%) is in Flood Zones 2 and 3. It is considered that the part of the site in Flood Zones 2 and 3 should be allocated as water compatible open space consistent with the government's Planning Practice Guidance.	See above.
E1464, Cllr De Asha	Support in general, however there are existing highway problems that would need to be dealt with as any new development will escalate these further. Education facilities will also have to be improved and extended	See above.
E1460, Cllr Glover	Support for new build, especially for this part of the Borough with a high ageing population, however, there are existing highway problems that would need to be addressed, and new education, healthcare and public facilities are needed.	See above.
E1468, Cllr Long	It is important that land designated as Safeguarded Land is not built upon before it is needed.	See above.

SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1555, Helen Howie on behalf of Wallace Land Investments	The developable area of the site needs to be re-estimated due to the high voltage overhead lines and flood risk areas.	See above.	
SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
	Development of this site will start the merger of settlements contrary to Green Belt objectives.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.	
E0224, Rainhill Civic Society	Development of this site would lead to further highway problems. Safeguarded land should not come forward unless the Local Plan is further reviewed.	See above.	
E1452, Rainhill Parish Council	We share local residents concerns that the proposal will lead to additional traffic congestion, a problem intensified should the High School extend, leading to detrimental highway safety. There will be an increase on education and health wellbeing facilities which will exacerbate existing health problems for residents.	See above.	

SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1400 Parish Cllr Long	Residents have strong concerns regarding the lack of infrastructure, and the pressure new development will have on the highways, education and health facilities. The retention of a strip of green land along the southern side of Mill Lane should be kept to ensure the character of the nearby heritage assets are protected	See above.
	Highway impact – the junction at Mill Lane/Warrington Road is subject to congestion and need extensive traffic control measures to address the increasing traffic.	See above.
	Highway safety – the Ashton Avenue/Mill Lane junction is very busy and access route to Briscoe Estate is a blind corner making accidents likely; increased congestion would make this even worse. Many of the roads are too narrow.	See above.
	Highway safety - drop off and collection times at tower College is a hazard with current traffic levels.	See above.
	Access and highway safety - Mill Lane is an extremely narrow road, single side pedestrian footpath. This road will need expansion to cater for additional traffic and reduce risk of accidents.	See above.

SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO561, Cronton PC	Development will greatly increase traffic flow through Cronton village as motorists avoid congestion at Rainhill Stoops roundabout. Hall Lane is in part single lane and totally unsuitable for increased traffic flow	See above.
	Flood risk – the development of this land will increase risk of flooding – areas to the bottom of the hill as well as the M62 will be liable to flooding from rain water that currently goes to fields and the water table will be removed.	See above.
	Heritage inapt – proposed development will be too close to the Conservation Area and Manor Farm Pub which dates back to 1662.	See above.
	Wildlife/ecology - endangered species of bees and Skylark are at risk if their habitats are developed.	See above.
	Local primary schools are already fully subscribed.	See above.
	Development of the site will result in footpath being lost.	See above.
E1446, Knowsley Council	Allocation of this site has the potential for an unacceptable adverse impact on Knowsley residents and businesses	See above.
	There is an over-reliance on a small number of sites that puts the Plan at risk. As such Site HS23 should be identified as an allocation for delivery in the first phase of the Plan.	See above.

SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Support in general, however there are existing highway problems that would need to be dealt with as any new development will escalate these further. Education facilities will also have to be improved and extended (E1464, Cllr De Asha)	See above.
	Support the removal of this site from Green Belt, however it should be allocated within this Plan period. The boundary should also extend and follow the M62 line rather than a line across a field (E1555, Helen Howie on behalf of Wallace Land Investments).	See above.
E1555, Helen Howie on behalf of Wallace Land Investments	This site is a more suitable site than HA8.	See above.
E1555, Helen Howie on behalf of Wallace Land Investments	The majority of the site is of low agricultural quality. There are no environmental designations on or adjoining the land. The site is not affected by any fluvial flooding but there are some surface water issues that will be addressed through improved drainage. There is a public right of way through the site and proposals will create a green corridor to accommodate this.	See above.

SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	The site is located within a SSSI Impact Risk Zone. The nearest SSSI is the Mersey Estuary which is located 6.1km to the south of the site. The proposals will have no impact on this designation. Detailed studies would be carried out in relation to the existing TPO's on site (E1555, Helen Howie on behalf of Wallace Land Investments)	See above.
E1460, Cllr Glover	Support for new build, especially for this part of the Borough with a high ageing population, however, there are existing highway problems that would need to be addressed, and new education, healthcare and public facilities are needed.	See above.

SITE HS24 - LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Development of the site will lead to urban sprawl and should not be removed from the Green Belt.	This site has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to safeguard the site but with a reduced site size. The reasons for this are set out in further detail in the Green Belt Review 2018.

SITE HS24 - LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Existing traffic issues will become worse on Elton Head Road, Lowfield Lane, St.Helens Linkway, Sutton Heath Road, Nutgrove Hall Drive, The Broads and Heatherleigh Estate.	Policy LPA07 addresses the issue of traffic impacts from development.
	Increased traffic will give rise to air pollution levels and associated health impacts.	Policy LPA07 addresses this through provision to minimise traffic and associated impacts including air pollution.
	Coal seams are likely to exist at the site as geology and historic maps dating back to 1849 suggest – historic mine workings area pose risks such as noxious gases such as methane. This will need to be investigated.	Ground conditions would need to be addressed in the event of the site being proposed for development.
	The cumulative impact of this and housing sites in Rainhill and Whiston Garden Village plan will add an additional 4000+ homes will be too much for local infrastructure to cope with.	LPSD Policy LPA08 requires that, where appropriate, developer contributions be provided to fund necessary improvements.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Local Wildlife Site 'Randles Brook' runs along the southern perimeter. In the absence of any information as to how this wildlife site will be protected the Trust objects to the site being partially safeguarded on the basis that its future development would be likely to have an adverse impact on a designated Local Wildlife Site. Water Voles are recorded on this LWS. Large amounts of geese are recorded in this tetrad so should the allocation go ahead HRA conditions should apply.	LPSD Policy LPC06 provides significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement. The site is proposed to be safeguarded for longer term use after the plan period of 2035.

SITE HS24 - LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1545, Ruth Jackson Planning on behalf of Gascoyne Holdings Ltd.	Release of land for housing in this vicinity will deliver much needed land for housing whilst safeguarding the remaining land as functional green gap	Support noted. The site is allocated to be safeguarded for longer term use after the plan period of 2035.	
E1546, Ruth Jackson Planning Ltd. on behalf of Fuavel, McMahon, Platt and Gascoyne Holdings Ltd.	Strongly support the release of this land for housing.	Support noted	
E1565, Frank Marshall & Co. on behalf of Mr Platt	Support the release of land from Green Belt, however it should be allocated in this Plan period and not safeguarded.	Support noted. There is no need to bring the site forward for allocation within the Plan period.	
E1568, Cassidy + Ashton on behalf of the Jones family	Support the removal of the site from Green Belt but it should be an allocation rather than safeguarded. Ground conditions are likely to be similar to neighbouring sites recently approved for residential development and surface water runoff and drainage can be dealt with in a similar manner. There is relatively little ecological value, with the greatest variety of species and value likely to be of the edge within trees and hedgerows which would be retained. The site also has a good relationship to the existing built form and services.	Support noted. There is no need to bring the site forward for allocation within the Plan period.	

POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two developers object to criteria 1. - last bullet point refers to 'demonstrable harm', however NPPF states 'severe' therefore the Policy is lowering the threshold and is unlikely to survive scrutiny as currently worded.	Comment noted. Policy LPA07 has been amended to reflect the 'severe harm' test in the NPPF (2018).
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	The policy refers to the adopted Ensuring a Choice of Travel Supplementary Planning Document SPD, and as such needs to be treated with caution and the Council should clarify the policy position on this.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E0442, Billinge Chapel End PC	The policy requires new developments to <i>"maintain the safe and efficient flow of traffic on the surrounding highway network"</i> . The proposal is likely to conflict with these requirements.	Comment noted.
E1467, Cllrs Glover, Neal & Baines	The proposed development at HA16 will be contrary to Criterion 7 and will have a detrimental impact on the existing network.	See comments on site HA16.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	In respect of criteria 4, the reference to key road networks should be clarified to confirm whether this refers to the primary route network as shown on figure 4.2.	The wording of criterion 4 has been amended to make its meaning clearer and to ensure that it reflects the revised NPPF (2018)
E1462, Cllr Deakin	A truck stop should be developed in the A49/M6 area to reduce the number of HGV's adding the existing heavily congested roads.	Comment noted. This is a matter which would need to be considered via relevant delivery agencies..

POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Welcome the reference and support given to the Skelmersdale Rail Link proposals (E1447, West Lancashire Council).	Support noted
E1494, Merseytravel	Would be useful to make reference to other transport strategies such as the LCR Rail Strategy, Bus Strategy, Freight & Logistics Strategy, etc.	Policy LPA07 refers to key strategic documents in the supporting text.
E1495, CPRE	The Plan should ensure as much development is reliant on public transport infrastructure to ensure it is truly sustainable. More progress is needed to improve public transport and sustainable models such as walking and cycling.	Policies LPA02 and LPA07 address the issue of sustainable transport. Policy LPA02 states that <i>“high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth”</i> .
E1496, Highways England	Support the policy in general, however as it references the Ensuring a Choice of Travel SPD, which is no-longer considered relevant in certain respects, the policy should include reference to supersede this document where possible.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support for criterion 6.	Support noted

POLICY LPA07 TRANSPORT AND TRAVEL		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Reference to the 'Ensuring a Choice of Travel SPD' made but is likely to be updated and/or evolve during lifetime of plan. Reference should be inserted to make clear any predecessor document will also be taken into account.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1494, Merseytravel	Improved sustainable travel access from the new Newton-le-Willows interchange should be promoted by the plan.	Policies LPA02 and LPA07 address the issue of sustainable transport. Policy LPA02 states that <i>"high quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth"</i> .
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Policy needs to confirm that the most up to date SPD and/or travel studies will be used during the plan period to ensure that the most relevant and up to date information is used.	Policy LPA07 has been amended to confirm the Council's intention to review the SPD.
E1496, Highways England	The Strategic Employment Sites are not primarily located to take advantage of sustainable and active transport, and, other than the Parkside site, are not located where freight rail can be provided.	Policy LPA04.1 reflects the need to provide sustainable and active transport provision to serve the sites.

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1250, Rainford Action Group	There is no infrastructure plan, making it impossible to fully assess the impact of the proposals for Rainford.	The LPSD allocations are supported by a robust evidence base including the St.Helens Infrastructure Delivery Plan (IDP) 2018. The IDP will be published with the LPSD.
E1456, Rainford Parish Council	It is difficult to see how the stipulation that the water flow rate must remain the same post development as it was before will be achieved.	Comment noted. Policy LPC12 promotes the use of sustainable drainage systems in appropriate cases.
E1571, Indigo Planning on behalf of Barratt Homes	Object to wording of the policy as it is vague and unjustified.	Policy LPA08 has been revised and is aligned with national policies including the NPPF(2018).
E1571, Indigo Planning on behalf of Barratt Homes	Further clarity needed on how policy clearly satisfies tests of the Framework and CIL Regs in terms of ensuring necessity and appropriateness of contributions/provisions sought	The revised wording of policy LPA08 (clause 2) makes it clear that its provisions are subject to the relevant statutory tests and national policy concerning developer contributions. The Council intends to produce a Supplementary Planning Document on Developer Contributions to provide detailed information on how and when developers will be expected to contribute towards services and infrastructure delivery.
E1571, Indigo Planning on behalf of Barratt Homes	In terms of developer contributions these should be dealt with via S106 contributions and calculated as such rather than being policy specific.	Policy LPA08 provides a suitable policy framework on developer contributions. The policy is sufficiently flexible to deal with specific cases.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	There is no mention of external funding for major infrastructure projects, allocated sites should not be expected to "fix" existing problems.	Comment noted. Developer contributions sought under the policy would be subject to the normal statutory tests.

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Any viability studies should be wholly independent so if the developer is required to pay for the study it should be done by an agreed independent third party of qualified surveyors not the Council's retained preferred external consultant.	The policy does not seek to determine whether the Council's viability consultant should be used..
	Two developers object to the text and state that the wording should reflect the requirements set out in the NPPF and make it clear that contributions will be subject to and not merely informed by site specific financial viability.	Comment noted. The Council intends to produce a Supplementary Planning Document on Financial Contribution to provide detailed information on how developers will contribute towards services and infrastructure delivery.
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Policy wording needs amending as it does not make sufficiently clear the circumstances in which certain contributions will be sought. Any financial contributions can be dealt with by way of S106 or CIL.	The Council intends to produce a Supplementary Planning Document on Financial Contribution to provide detailed information on how developers will contribute towards services and infrastructure delivery.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	The policy allowance for viability assessments is not supported.	to support policy LPA08, the Council has published a Borough-wide economic viability assessment (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Object to criterion 3 as it is unsound to phase development to coincide with the release of additional infrastructure. This can significantly delay development.	The approach in policy LPA08 is sound and aligned with national policies including the NPPF (2018).

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Object to criterion 5, part IV should be deleted as planning obligations need to pass the statutory tests found in Reg 122 of the CIL Regulations.	The policy has been revised and is clear that its provisions are subject to these tests.
LP0140, Merseyside Fire & Rescue Authority	Merseyside Fire and Rescue Authority are suitably reassured by the policy for infrastructure delivery and funding.	Support noted.
E1495, CPRE	Broadly supportive of policy	Support noted
E1496, Highways England	Highways England should be consulted as soon as possible on the potential infrastructure requirements considered for the IDP where these include the SRN. Further detail should be included within the specific site allocations, and sites phased accordingly within the Plan where this is identified.	Comment noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Support the policy in general but the Council must make sure they do not impose requirements that could make schemes unviable.	Support noted. Policy LPA08 reflects viability issues. It states that <i>“When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development”</i> .
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	The reference to viability review and ensuring funding sought for future infrastructure does not undermine viability of a scheme is welcome, and should reflect para 204 of the NPPF.	Policy LPA08 reflects viability issues. It states that <i>“When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development”</i> .

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1563, Barton Willmore on behalf of Millar Homes	Welcome the clarity and flexibility of this policy and types and priority of infrastructure to be delivered. The Council should only seek planning obligations from developments where it can be shown to meet all the tests as set out in para 204 of the NPPF.	The Policy reflects these tests.
E1549, Persimmon Homes North West	Accepts the Council's approach to obligations and highlights para 173 of the NPPF. Sites of challenging viability need to have a clear balance between the deliverability of the scheme and the requirement for planning obligations.	Comment noted.
E1561, Turley on behalf of Story Homes North West Ltd.	Support in general however contributions should be determined on a site by site basis.	Support noted. Policy LPA08 provides a suitable policy framework on developer contributions. The policy is sufficiently flexible to deal with specific cases.
LPPO140, Merseyside Fire & Rescue Authority	The details of the proposed Developer Contributions Supplementary Planning Document and the Infrastructure Delivery Plan should also be available for consultation as part of the suite of documents to this consultation.	Comment noted. The infrastructure Delivery Plan will be published with the LPSD.
E1502, United Utilities	Future developer(s) should contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure.	Comment noted.

POLICY LPA08 - INFRASTRUCTURE AND FUNDING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1502, United Utilities	Many of the proposed allocated sites have UU assets running through them. All UU resources will need to be afforded due regard in the master planning process for a site.	Comment noted.

POLICY LPA09 - GREEN INFRASTRUCTURE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1561, Turley on behalf of Story Homes North West Ltd.	Criteria 3. - Enhancements to the Green Infrastructure network are not always necessary to ensure development is acceptable in planning terms, and as such the policy should be amended to include "where required".	LPSD Policy LPA09 is aligned with national policies especially Para.96 of the NPPF.
E1492, Sport England	Policy is supported but should be strengthened so that justification provides clarity around how playing field provision differs from other open space typologies.	Support noted. Playing fields are addressed under policies LPA08 (as a form of infrastructure) and LPC05.
E1501, Canal & River Trust	Support the provision of this policy, specific reference should be made to the role that the canal corridor can provide.	Support noted. Policies LPA09 and LPC07 provide policy provision to cover this issue.

POLICY LPA09 - GREEN INFRASTRUCTURE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Where development proposals result in some loss or fragmentation of green infrastructure, that compensatory provision can be offered and provided to offset any loss. The last sentence of the policy should be reworded to reflect this, in line with para 118 of the NPPF.	Comment noted. The scope for compensatory provision in appropriate cases is extensively covered in various parts of the Plan including policies: LPC05: Open Space and Outdoor Sports Facilities LPC06: Biodiversity and Geodiversity LPC08: Ecological Network LPC09: Landscape Protection and Enhancement; and LPC10: Trees and Woodlands
E1488, Historic England	An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF	This matter is covered by Policy LPC 11.
E1499, Natural England	Policy should be extended to define what the Green Infrastructure is and include links to definitions.	Comment noted. Clause 1 sets out the key aspects of the green infrastructure network in St.Helens.
E1503, Kingsland Strategic Estates Ltd.	This policy should retain/place significant emphasis on the objective to enhance Green Infrastructure as opposed to mitigation.	Comment noted. The revised policy contains several references to enhancement.
	Those sites proposed for release, such as Site HA4 are extremely well placed to deliver strong and enhanced connections to Greenways and to assist in the delivery of the Bold Forest Park Area Action Plan.	Comment noted

POLICY LPA09 - GREEN INFRASTRUCTURE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	The Open Spaces Study does not form part of the development plan and the current approach seeks to effectively give it development plan status by actively linking it to a policy within the LP. Policy should explicitly list space standards and only refer to the Open Spaces Study as evidence.	Comment noted. Open space standards can be found in the supporting text to Policy LPC05 (table 7.1).
E0442, Billinge Chapel End PC	Policy refers to Billinge Hill as a new nature reserve site. Therefore it is disappointing that such a significant and popular site will be adversely affected by Site HA1.	Comment noted. This site has been deleted as a site allocation.
E1492, Sport England	Sport England suggests amending point 2 of policy LPA09 to say <i>"The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."</i>	Comment noted

POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0278, Parkside Action Group	The Omega EA1 development is linked to the Warrington BC Omega development and as such the SRFI would be better suited here. The Parkside site would be better used as an education facility such as a university.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use.
L0770, Parkside Action Group	Previous documents make it clear that Parkside West should only be set aside for the purpose of an SRFI. It is clear that the only reason to remove it from its intended purpose is to support the Council's relationship with Langtree development.	Parkside West (site 8EA) and the Parkside East site are required to provide the single largest economic development opportunity in the Borough. The parts of the site which are not directly required to provide rail or road infrastructure or landscaping will also make an important contribution to meeting needs for employment development.
E1458, Winwick PC	Concern that the aspirations for Parkside East to be developed as a SRFI are not realistic given movements of goods by this method of transport, which could lead to a site being used for a different purpose and further impact on local roads.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1458, Winwick PC	Development of this site would be harmful to the open aspect of this area for residents of Winwick.	Policy LPC09 addresses the visual impact from new development.
E1488, Historic England.	There is no mention that sites EA8 & EA9 lie in close proximity to designated heritage assets, despite being identified in the SA and its conclusion that the effects on them is likely.	Comment noted. Impacts on heritage assets are addressed in Policies LPA04.1 and LPC11.

POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Strongly object to a SRFI here as it will severely harm the ability of the Newton-le-Willows GB to fulfil its purposes, as well as causing adverse environmental and social impacts, and due to the spare capacity on the West Coast Mainline.	The development of rail freight terminals remains a key priority of national policy. The Parkside East site is uniquely placed to address this. Policy LPA10 however recognises that the site also has potential for development of other rail enabled uses. It will allow a range of employment uses to be developed provided at least 60 hectares of the site is reserved for development of rail enabled use. The reasons for releasing the site from the Green Belt are set out in the St.Helens Green Belt Review 2018.
E1495, CPRE	Query the robustness of the AECOM Study concerning the alternative options for the SRFI scheme.	The evidence supporting the LPSD policy LPA10 is robust and is aligned with national policy.
E1486, McGinn MP	Welcome the inclusion of Parkside and the identification of Earlestown as the second town centre within the Borough; however it needs to be made clear that traffic generated from the Parkside development will be directed to the motorway to minimise the impact on local roads.	Support noted. LPSD Policies LPA04.1 and LPA07 address the issue of traffic impacts from the development.
E1494, Merseytravel	Support the policy, reference should be made to the AECOM Parkside Study and other technical studies that have been produced in regards to rail connection.	Support noted

POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1496, Highways England	Site EA8 will potentially generate a number of vehicle movements which may impact on J22 of the M6, and requires direct access to the site via the M6. It should be noted that as part of the Smart Motorway upgrade J22 is identified for improvements and scheme/design for direct access to the site would need to pay due cognisance to this proposal.	Policy LPA07 and the master planning requirements within Policy LPA04.1 and LPA10 address issues concerning traffic and vehicle movement from the site.	
E1496, Highways England	The IDP and transport evidence base for the site allocations is not yet available for review. As this site has the potential for significant impacts on the SRN, and require HE's cooperation in regards to a new access point, it is essential that this transport evidence base is reviewed as soon as possible	The Local Plan Transport Impact Assessment and the Infrastructure Delivery Plan (IDP) will be published with the LPSD. The Council wishes to continue working pro-actively with Highways England to address these issues.	

POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1570, Emerson/Orbit	Object as policy should include improvement of linkages to Linkway West and identify it as a part of the centre or at least as Retail Park on the St.Helens Core Area Map. The development will help to retain trade and spend in the town centre that is currently lost outside the Borough by providing a new bowling alley and improving the leisure and retail offer, which will create linked trips between other operators within the town centre.	Policy LPB01 has been revised and recognises (in what is now point 5) the importance of linkages between the town centre and Linkway West. The town centre boundary has not been extended to include Linkway West. The approach set out in Policy LPB01 accords with relevant policies in the NPPF.	
E1482, Spawforths on behalf of Network Space	The Area of Opportunity identified on the Policies Map does not outline what would be acceptable nor the evidence to support this. It is difficult to understand how a proposal might impact or indeed work alongside the Area of Opportunity without knowing what this may be. Policy is imprecise and is therefore not effective.	The Council's 'town Centre Strategy' sets out aspirations for the future of St.Helens town Centre. The LPSD is aligned with this Strategy which will enable the implementation of its recommendations including the identification of potential redevelopment opportunity areas to revitalise and enhance the town Centre's retail and leisure offer.	
E1482, Spawforths on behalf of Network Space	The role of the CSA should also be considered as an Area of Opportunity and the Policy must have inherent flexibility so as to respond to market requirements and not inadvertently miss out on development opportunities.	Policy LPB01 continues to focus retail and other town centre use investment into suitable locations within the town centre as a first preference (as opposed to the remainder of the Central Spatial Area). This approach is in line with national policy.	

POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1482, Spawforth's on behalf of Network Space	The second criterion seeks to limit what Langtree Park Phase 2 may offer. The criterion allows leisure, food and drink uses, conferencing and hotels. It does not prevent retail or 'intensive leisure' provided that such uses do not compromise planned investment in the town Centre. Again it is unclear what 'intensive leisure' means and hence this is too imprecise for inclusion in Policy. It is also unclear what 'planned investment' in the town Centre means as this has not been identified. This too is unclear and so again is imprecise.	LPSD has removed point 2 of the policy LPB01 referring to uses considered acceptable on Langtree Phase 2 site as any development proposals for a main town centre use on this site would still be subject to the national policy tests concerning alternative sequentially preferable sites and the impact on existing centres.
E1501, Canal & River Trust	Support for policy seeking to secure opportunities to improve the public realm by retaining and enhancing the existing waterway of the St.Helens canal.	Support noted
E1482, Spawforth's on behalf of Network Space	Network Space concur that linked trips within all facilities within the CSA should be actively encouraged as part of a wider strategic town centre vision. It is imperative that opportunities for town centre uses that would form a regional/city regional draw within the CSA must not be lost and the policy should have more flexibility to allow the town Centre to expand to the south onto Langtree Park so that it can effectively compete with other centres in this part of the North West.	Comment noted. The LPSD does not expand the designated town centre in the manner suggested. Its approach on this point is in line with relevant evidence in the Retail and Leisure Study 2017 and national policy.

POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1470, Cllr Haw	Vacant land adjacent to Langtree Stadium should be used for affordable housing. Rather than building houses out in semi-rural Eccleston, there needs to be more focus on regenerating the town and encouraging people to live here, which will revive and regenerate the town centre, and reduce the need to release precious GB.	Comment noted. Clause 6 of the revised Policy LPB01 confirms that proposals for housing or a mix of housing and other suitable use(s) within or on the edge of the town Centre will be supported where they would avoid prejudicing the retail and service role of the town Centre.

POLICY LPB02 - EARLESTOWN TOWN CENTRE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1575, Tesco Stores Ltd.	Support the inclusion of the Tesco store within the town Centre boundary and Primary Shopping Area	Support noted
E1457 Cllrs Gomez-Aspron, Bell & Dyer	Generally support, however, wording needs amending in line with the Core Strategy by adding the following line " <i>provide a framework for future regeneration and redevelopment</i> ".	Support and comment noted. This wording has been added in clause 4 of the policy.
E1575, Tesco Stores Ltd.	Consider it appropriate to have a separate policy specifically for Earlestown which recognises the centre's importance within the local retail hierarchy.	Support noted
	Policy needs to address air quality issues along Market Street	Policy LPD09 addresses air quality issues.

POLICY LPC01 - HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO585, Eccleston Homes	The requirement that on greenfield sites of 25 or more units 5% of the market housing should be bungalows is unjustified. There is no planning reason for such an imposition and the market should be allowed to determine the mix of housing on any site.	The requirement for bungalows responds to evidence of demand in the Mid Mersey SHMA (2016) and the St.Helens SHMA update 2018. It has been retained in the policy.
LPPO863, Hollis Vincent	This policy should apply only to new proposals, not to sites with extant consent for housing.	Comment noted
E1489, Home Builders Federation	Criterion 2 - the reasoning for 5% of bungalows is unclear - more evidence is required to back this up. Plus it is for all Greenfield sites regardless of their location. Recommend changes it to a supportive policy stance which encourages rather than requires	The requirement for bungalows responds to evidence of demand in the Mid Mersey SHMA (2016) and the St.Helens SHMA update 2018. It has been retained in the policy.
E1489, Home Builders Federation	Criterion 3 - this standard is inappropriate and contrary to national policy. Specific evidence is required to include such a requirement.	The reference to Lifetime Homes has been replaced with targets concerning the optional building regulations standards for 'accessible and adaptable' and 'wheelchair user' dwellings. The targets set out are justified by the evidence and are consistent with national policy.
	Thirteen developers object to the 20% requirement or more of all units to be designed to Lifetime Homes standard as they consider this to be contrary to national policy.	The reference to Lifetime Homes has been replaced with targets concerning the optional building regulations standards for 'accessible and adaptable' and 'wheelchair user' dwellings. The targets set out are justified by the evidence and are consistent with national policy.

POLICY LPC01 - HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Whilst SHMA is important in identifying overall housing mix required across the Borough, new housing developments should be designed with 'reference to latest SHMA' as opposed to being required to be 'consistent with' the SHMA.	The policy retains the reference to 'consistent with' to provide certainty.
LPPO356, McCarthy & Stone	Council is commended for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population. The wording of this sub-clause contributes to this goal and an inclusive plan with respect to older people.	Support noted
LPPO538, Torus Housing	Torus/Helena committed to providing appropriate supported and specialist housing although viability of schemes is difficult in the current political environment.	Comment noted.
E1489, Home Builders Federation	Criterion 6 - support the flexibility element but should not be used to justify the unsustainable requirements of the rest of the policy	Support noted. Some other policy requirements have been revised.
E1459, Cllrs Jones, Mussell & Reynolds	Support the provision for the elderly, as Rainford needs more sheltered accommodation	Support noted
E1503, Kingsland Strategic Estates Ltd.	The policy provides certainty and clarity for landowners and developers regarding the mix of housing sites should deliver	Support noted

POLICY LPC01 - HOUSING MIX		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO356, The Planning Bureau Ltd. on behalf of McCarthy & Stone Retirement Lifestyles Ltd.	Commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population. We consider the wording of this sub-clause contributes to this goal and an inclusive plan with respect to older people.	Support noted.
E1556, JLL on behalf of Suttons Group	Support removal of the requirement for affordable housing from all brownfield sites apart from Zone 4. This is consistent with the priority afforded to the regeneration of brownfield sites within the NPPF.	Support noted
	Suggest that this policy incorporates more flexibility to allow an assessment of site specific needs.	LPSD Policy LPC01 allows flexibility in the delivery of mix of housing. It states that <i>"New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes consistent with relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)"</i> .

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1542, Barton Wilmore	It is unclear whether the proposed approach of parts a) and b) will provide a sufficient level of housing to address this need or oversupply. More clarity should be provided on the numbers of affordable dwellings the Council expects to be delivered over the Plan period.	It is not possible to accurately predict the exact balance of housing development that will take place across the defined zones over the Plan period, nor the resultant density. That being the case, it is considered reasonable to set out the proportion of dwellings brought forward for implementation that are to be affordable.
E1542, Barton Wilmore	Zones 2 and 3 should be merged to create a single area, allowing for the policy to be simplified	The Council's approach to this point is informed by its viability evidence. Consideration is being given to this point.
E1542, Barton Wilmore	Unable to support the proposed percentages outlined within this policy due to the lack of evidence regarding viability supporting the plan	The St.Helens Local Plan Economic Viability Report 2018 shows that there are geographical disparities in viability and this has informed the zonal approach proposed. Policy LPC02 contains affordable housing zones which follow ward boundaries as presented in Figure 6.1.
E1560, Pegasus Group on behalf of Redrow Homes North West	Accept that some brownfield sites benefit from lower affordable housing targets compared to greenfield, however, we have not seen evidence on this matter.	The lower requirement for affordable housing on brownfield sites is a result of the overall assessment of the viability of such sites in relation to greenfield site. This is considered by the St.Helens Local Plan Economic Viability Assessment (2018), which is referenced in the Reasoned Justification.
E1560, Pegasus Group on behalf of Redrow Homes North West	Question whether the 30% requirement could be reduced for some zones assuming the annual affordable housing requirement could still be met.	The St.Helens Local Plan Economic Viability Report 2018 shows that there are geographical disparities in viability and this has informed the zonal approach proposed.
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Disagree with brownfield sites only having to provide 10% whereas greenfield sites have to provide 30%. A flat affordable housing requirement should be provided which is supported by robust and up to date evidence	Comment noted. The disparities in affordable provision on greenfield and brownfield land are due to viability differences. If a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSPD
EFP0260, Billinge PC	New homes need to be affordable	Comment noted
E1571, Indigo Planning on behalf of Barratt Homes	Policy should recognise the requirement for starter homes and be included on residential sites from the outset.	Comment noted. Starter homes are only part of the range of affordable housing options that are available. Clause 3 has been revised to support affordable home ownership in line with national policy.
LPPO538, Torus	Some sites in Zones 2 and 3 where affordability is an issue, therefore shared ownership schemes may be a viable option on some of these sites	Comment noted
LPPO863, Hollis Vincent	The viability for affordable homes should be assessed on a site by site basis, as provided for by point 3 of the Policy, and should not apply to schemes with extant planning consent	Comment noted. Policy LPC02(4) states that <i>"provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development"</i> .
E1445, Sefton Council	The Plan does not appear to include an affordable housing requirement. NPPF para 159 states that Local Plans should address the needs of all housing types including affordable housing. This would help justify the requirements for affordable housing in Policy LPC02.	Policy LPC02 is aligned with national policy and guidance. Evidence of the numbers of affordable homes needed in the Borough as a whole is set out in the supporting text to Policy LPC01.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Newton-le-Willows is in Zone 4, but the subscript to Figure 6.1 states that this zonal designation only applies to part of the area, but does not go on to say which particular areas. More clarity for landowners will be required to assess the levels of affordability impacts on viability.	The affordable housing zones have been revised in the light of the Economic Viability Assessment 2018 and follow ward boundaries.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1459, Cllrs Jones, Mussell & Reynolds	Welcome 30% of allocations having to provide affordable housing, to enable 2nd and 3rd generations to gain access on the property ladder. However developers always submit applications to remove the affordable housing element from the scheme, this must not be allowed to happen.	Support noted.
E1561, Turley on behalf of Story Homes North West Ltd.	Welcome efforts to improve affordability; however the variation in the level of provision needs to be fully evidenced and tested. Part 3 represents a sensible and practical approach ensuring flexibility.	Support noted. The zonal variation in the provision of affordable housing is supported by St.Helens Local Plan Economic Viability Report (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England	Note a degree of flexibility, however there should be some reference to starter homes within the policy and Part 1 should be deleted as affordable housing is not restricted to provision by Registered Providers of Social Housing.	Comment noted. Starter homes are only part of the range of affordable housing options that are available. Clause 3 has been revised to support affordable home ownership in line with national policy.
E1469, Cllrs Banks, Bond & Burns	Lack of affordable housing in potential new developments disproportionately affects local residents and has a direct effect on social mobility and is a driver of regeneration and prosperity in post-industrial communities.	Comment noted. Policy LPC02 addresses this.
E1503, Kingsland Strategic Estates Ltd.	Recommend that the policy specifically incorporate a level of flexibility for those sites close to the boundaries. The dynamics of local markets will change over the plan period and the policy should recognise and allow for this.	Comment noted. The zones follow ward boundaries as indicated by the St.Helens Economic Viability Assessment 2018.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Generally supportive of policy, however, it remains unclear how the Council arrived at a 30% provision of affordable housing requirement. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.	Support noted. Affordable housing requirements are informed by evidence in the St.Helens Strategic Housing Market Assessment Update 2018 and the St.Helens Local Plan Economic Viability Report (2018).
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Welcome this approach as opposed to a Borough wide target. However levels of affordable housing provision must be based on the results of the Economic Viability Report.	Support noted. The targets in policy LPC02 are informed by evidence including the St.Helens Local Plan Economic Viability Report (2018).
	Support the flexibility of this policy in terms of site by site basis and viability assessments.	Support noted
E1542, Barton Wilmore	Support criteria 3 & 4 of this policy	Support noted
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	The caveat to relax affordable housing provision following a viability assessment is supported.	Support noted
E1549, Persimmon Homes North West	Supports part 3, and it is considered important that the Council demonstrate flexibility in renegotiating the amount and tenure of affordable housing.	Support noted.
E1556, JLL on behalf of Suttons Group	Support removal of the requirement for affordable housing from all brownfield sites, apart from Zone 4.	Support noted.

POLICY LPC02 - AFFORDABLE HOUSING PROVISION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Generally supportive of policy but there is a lack of viability evidence to back up the zonal requirements.	Support noted. The targets in policy LPC02 are informed by evidence including the St.Helens Local Plan Economic Viability Report (2018).
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	In total agreement with this policy regarding the distribution and variation of affordable housing requirements.	Support noted
LPPO538, Torus	Specific brownfield sites may be unviable if affordable provision is required. However there will be sites within Zones 2 and 3 where affordability is an issue and new build market sale, even within these lower value areas, will be out of reach for aspiring home owners. Shared ownership may be viable on some of these sites.	Comment noted. Where a developer considers that the affordable housing requirements set out by this policy are not viable on a specific site, then this will need to be justified through a robustly prepared, transparent and independent financial appraisal.
E1489, Home Builders Federation	Without a published viability report, which considers the cumulative impacts of all plan policies and obligations, it is not possible to determine whether the proposed policy would retain viability in the majority of cases.	The LPSD is informed by an up-date viability report.

POLICY LPC03 - GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	The sites are adjacent to Local Wildlife Site 'Thatto Heath Meadow'. It should be demonstrated that there will be no adverse impact on a designated Local Wildlife Site.	No change made. Local Wildlife Sites are given adequate protection by policy LPC06.
E1488 Historic England	A criterion should be included safeguarding the historic environment from unjustified harm in order to guide any future sites which may come forward.	No change made. Heritage assets are given adequate protection by policy LPC11.

POLICY LPC04 - RETAIL AND TOWN CENTRES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, The Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the exclusion of the Linkway West development site, which is an accessible town centre site and the town centre boundary amended to include this area.	The LPSD does not extend the town centre to include the Linkway West site. The St.Helens Retail and Leisure Study 2017 states that the existing St.Helens town centre boundary as defined by the adopted development plan is relatively extensive, particularly to the north covering large areas of residential uses and other non-town centre uses. The study highlights that the A58 ring-road acts as a 'natural' boundary to the south west of the town centre. It recommends that the new Linkway development at Westpoint is not included within the town centre boundary. This is primarily due to the lack of any direct and accessible crossing over the A58. This consolidated boundary reflects the appropriate character of the in line with the approach in the NPPF (2018).

POLICY LPC04 - RETAIL AND TOWN CENTRES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, The Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the absence of Millfields Court, Eccleston Grange from the proposed retail hierarchy. By the time that the Local Plan is adopted in late 2018, it is anticipated that Millfields Court will be fully operational. This should be designated as a Local Centre in the Plan.	Millfields Court has not been added to the list of centres. The hierarchy of centres listed in policy LPC04 accords with the findings of the St.Helens Retail and Leisure Study 2017. The centre boundaries will be kept under review in line with the NPPF to reflect changing needs.
E1575, DPP Planning on behalf of Tesco Stores Ltd	Object to the exclusion of the Tesco store from the draft Clipsley Lane local centre boundary.	This change has not been made. The boundaries of the local centre accord with the findings of the St.Helens Retail and Leisure Study 2017. The Tesco store is across a busy main road from the local centre.
	The proposed Rainhill District centre map is not consistent with national policy as there are no defined Primary Shopping Areas, Primary Retail frontages and Secondary retail frontages.	This change has not been made. The Council's Retail and Leisure Study (2017) provides robust evidence to justify defining Rainhill as a District Centre. The centre has a diversity of uses and facilities which are consistent with a district centre designation. It is however insufficiently large to justify having a separately defined Primary Shopping Area, or separate Primary and Secondary retail frontages.
E1563, Barton Willmore on behalf of Millar Homes.	Generally supportive, specifically the identification of Rainford as a Local Centre.	Support noted
E1482, Spawforth on behalf of Network Space	The general approach to the policy is sound, however the role and opportunities that the Central Spatial Area presents must be recognised to improve the critical mass of the town centre	Comment noted. Policy LPC04 in the LPSD is considered to provide a positive framework for the regeneration of the town centre and the Central Spatial Area as a whole.
	Updated retail and Leisure Needs Evidence should be made available when finalised.	The St.Helens Retail and Leisure Study (2017) has been published on the Council website.

POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
LPPO544, Pilkington Sailing Club	The clubhouse, car park and dinghy compound at Eccleston Mere should be included in the Open Space and Recreation Site designation as is associated infrastructure.	The boundaries of designated open space at Eccleston, Pilkington Sailing Club have been amended on the Policies Map to reflect the area that fulfils the open space function.
	There is insufficient green open space in Rainford. In particular: Rainford has no parks; only has 1.92 ha per 1000 population of natural and semi natural green space (this is below the threshold set out in your core strategy); and only has 0.28 ha per 1000 of amenity green space - this is the lowest in the Borough and analysis of these sites also show they are of poor quality.	<p>The St.Helens Open Space and Recreational study (2016) concludes that the Rainford area is served by the following typologies of open space and recreational facilities: Natural and Semi-Natural Green Space (20ha); Amenity Green Space (2.90ha); Children and Young People (0.98ha); Cemeteries and/or Churchyards (1.07ha).</p> <p>Under Policy LPC05, the Council will seek to protect existing areas of open space unless specified criteria in the policy are satisfied. Under Policy LPD03, the Council will also require new housing development to be served by an appropriate quantity of new open spaces to serve the new population where there would otherwise be a deficiency in the quantity, accessibility or quality of open space in that area.</p>
E1492, Sport England	Policy is supported but should be strengthened so that justification provides clarity around how playing field provision differs from other open space typologies and how local standards are not appropriate for outdoor sports as they cannot take account of sports catchment areas	Support noted. Policy LPC05 has been reviewed to reflect comments. A table in the supporting text (setting out the standards for different types of open space) refers – in the case of outdoor sport – to the needs assessment and site-specific recommendations in the Council's latest Playing Pitch Strategy and Action Plan.
E1479, Edward Lander Associates	Support the Policy, Rainford Golf Course is covered by this policy and as such should be removed from the GB.	Support noted.

POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Needs to recognise open spaces are possessed of historic interest. Cemeteries, parks and gardens may be registered. The policy could give additional definition and protection to historic and archaeological resources and assets.	Comment noted. Policy LPC05 supporting text references all typologies of open space including parks and gardens and cemeteries. Policy LPC05 has not been changed to refer to historic and archaeological assets as these are covered adequately by Policy LPC11.
E1503, Kingsland Strategic Estates Ltd.	This policy underpins the Vision and many of the Strategic Aims, perhaps the criteria could be re-ordered making it clear that the threshold is not to retain but to enhance facilities.	Comment noted. Enhancement is referred to in clause 1 of the Policy.
	Playing fields at Sidac should be designated as Local Green Space.	The Sidac Playing Field has received planning permission (Ref.P/20170890) for residential development. The site is not designated as a Local Green Space.

POLICY LPC06 - BIODIVERSITY AND GEOLOGICAL CONSERVATION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1499, Natural England	Policy need amending to bring it in line with the NPPF, with more emphasis on designated sites (para 113 of the NPPF).	Policy LPC06 has been amended to align with national policies and guidance including the NPPF (2018).
E1562, Barton Wilmore on behalf of the Church Commissioners for England.	Do not consider that this policy is balanced and in order to be sound the policy should be amended to state that if appropriate mitigation is proposed it is acceptable.	Policy LPC06 is robust and is aligned with national policies and guidance including the NPPF(2018). The circumstances in which mitigation should be pursued are appropriately addressed in the policy wording.

POLICY LPC06 - BIODIVERSITY AND GEOLOGICAL CONSERVATION		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Four developers object to Criteria 4 and the requirement for a 3:1 ratio for new off-habitat, and a 25 year management and implementation plan.	Policy LPC06 has been revised. However, the emphasis on avoiding harm to biodiversity (and on providing adequate mitigation and/or compensation as a last resort) has not been weakened. This is in line with national policy.
	Four developers query whether development viability has been taken into account; a more flexible approach is recommended.	Comment noted.
E1503, Kingsland Strategic Estates Ltd.	Welcomed policy, however, criteria 4 could be made clearer; acknowledging that it certain instances, there may be a benefit to the Borough to accept an offsite contribution.	Comment noted. The policy appropriately sets out the circumstances in which off-site mitigation may be considered.
E1499, Natural England	Generally supportive but the policy could be strengthened to ensure delivery and achieve the Vision for the Borough.	Comment noted. The policy as amended is considered to be sufficiently strong.
E1560, Pegasus Group on behalf of Redrow Homes North West	Policy needs to be amended in line with the NPPF and state 'where possible' with regards to a net increase in biodiversity.	LPSD Policy LPC08 covers net gains in biodiversity.
E0442, Billinge Chapel End PC	Site HA1 has a border with a local wildlife site (LWS14) and it is not clear how the conflict between a housing development and the Council's commitment to safeguard this local wildlife site will be addressed.	LPSD Policy LPC06 affords significant protection to wildlife in accordance with national policy and relevant legislation and where necessary will require appropriate levels of mitigation, compensation and enhancement.
E1492, Sport England	Policy quite rightly does not provide a local standard for outdoor sport	Comment noted.

POLICY LPC07 - GREENWAYS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1503, Kingsland Strategic Estates Ltd.	We support the concept of the Greenways but suggest that the proposed release of sites from the Green Belt provide an opportunity to extend this important network.	Support noted. Greenways have a primary function of providing sustainable movement and ensuring links to vital local communities' assets including access to employment sites, heathy facilities, recreational facilities and environmental assets such as wildlife habitat and wildlife corridors. The site profiles for the strategic sites refer to the need where appropriate to consider opportunities to extend greenway linkages.
E1495, CPRE	We would encourage the Council to identify areas of Tranquillity and set out policy accordingly.	The need for areas of tranquillity, or how they would be defined is not clearly set out in national policy. The LPSD does not therefore identify such areas.

POLICY LPC08 - ECOLOGICAL NETWORK		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1457, Cllrs Gomez-Aspron, Bell & Dyer	HA12 site is adjacent to SH3 a recognised protected area - the Council should not be removing parkland accessed by the public from public use; especially along the heritage asset of Sankey Valley.	Site HA12 has been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the site in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.
E1503, Kingsland Strategic Estates Ltd.	The sites proposed for release from the Green Belt are uniquely placed to deliver enhancements and this opportunity should be grasped.	Comment noted.

POLICY LPC09 - LANDSCAPE PROTECTION AND ENHANCEMENT			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
Rep.ref.no.	Summary of main issue	How each main issue has been addressed	
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Whilst the rationale of this policy is correct, further clarity is needed in relation to when assessments of landscape sensitivity and visual impact assessments are needed and that essentially this needs to be determined on a case by case basis.	Policy LPC09 has been revised. The policy wording contains appropriate flexibility by confirming that clause 1 applies having regard to the scale and nature of the proposal.	
E1488, Historic England	Welcome the reference to the European Landscape Convention in the supporting text, but fails to recognise its landscape protection definition. Similarly, St.Helens is covered by the Merseyside Historic Landscape Characterisation project but neither are mentioned in the policy.	Policy LPC09 has been revised to incorporate the Merseyside Historic Character Study.	

POLICY LPC10 - TREES AND WOODLAND			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
	Three developers raised concern in respect of part 5 and replacement tree ratios. Further clarity is required on these issues to ensure that this Policy requirement is sound.	The 2 for 1 tree replacement ratio in Policy LPC10 is aligned with the requirement in the NPPF to contribute to and enhance the natural and local environment. It has therefore been retained.i	

POLICY LPC10 - TREES AND WOODLAND		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Fails to recognise that many trees and areas of woodland are of heritage conservation value in their own right, some may benefit the setting of a listed building or lie along historic rights of way	Clause 7 of policy LPC10 refers to the heritage value of woodland. The policy also gives clear protection for example to veteran trees. Policy LPC11 is also relevant to this issue in specific cases.
E1503, Kingsland Strategic Estates Ltd.	This is a balanced policy that sets clear criteria.	Support noted
E1500, Environment Agency	Biodiversity Action Plans have been superseded by the Government's Biodiversity 2020 national strategy	Comment noted
E1571, Indigo Planning on behalf of Barratt Homes	Question the necessity for policy to refer to protection of trees already subject to TPO and also references to 'veteran trees' and 'hedgerows'.	Comment noted

POLICY LPC11 - HISTORIC ENVIRONMENT			
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD	
E1488, Historic England	Policy is not supported by robust local evidence on historic environment	The LPSD has a robust policy framework for the protection, enhancement and management of Historic assets. The Council's Heritage Background Paper (2018) will set out a positive strategic approach towards the protection and enhancement of heritage assets across the Borough of St.Helens. The LPSD is also informed by Heritage Impact Assessments (HIA) which will be published as supporting local evidence.	
E1488, Historic England	Policy is silent on how historic environment issues would be addressed through the vision.	Policy LPC11 has been revised and contains appropriate provisions to protect and enhance the historic environment. The vision in chapter 3 also refers appropriately to the Borough's unique heritage.	
E1488, Historic England	The NPPF makes it clear that even 'less than substantial' harm to either designated or non-designated heritage assets will be unsustainable it is not outweighed by public benefits part 1 c. is unsound therefore. Part 5 should reference the Merseyside Historic Landscape Characterisation project.	Comment noted. The revised policy is considered to comply with the relevant sections of the NPPF (2018).	
E1503, Kingsland Strategic Estates Ltd.	Agree with the underlying objective but consider the policy could be expanded and include the need for developers to undertake a desktop review of the history of the site and help the Council and local residents to record any historic interest.	Comment noted. This matter is addressed in clause 2 of the revised policy.	

POLICY LPC11 - HISTORIC ENVIRONMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
L0228, Rainford Heritage Society	The sites allocated in Rainford will bring Rainford closer to neighbouring parishes which will intrude into our heritage.	Policy LPC11 sets out how the Council will seek to conserve St.Helens' historic environment and promote awareness of its shared heritage. All proposals for development which may affect heritage assets or their settings are required to be accompanied by an Assessment of Significance which forms part of a Design and Access Statement and/or a Heritage Impact Assessment.
L0228, Rainford Heritage Society	Development will affect existing footpath network which are part of Rainford's heritage.	Most footpaths are not subject to any designation or identification as a heritage asset. However, they are (where they form a right of way) protected under other legislation.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	Historic buildings often provide valuable habitats for wildlife (e.g. bats). The policy should contain a requirement for such habitats to be protected and for planning applications to be accompanied by an ecological assessment.	This matter is adequately covered by policy LPC06, which addresses how ecological habitats and protected species should be addressed in planning applications.
E1488, Historic England	Historic and cultural assets could bring considerable impact on the value of a much broader range of economic sectors.	Comment noted

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT

Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Object to the draft policy, specifically point 11) as currently worded - it is not the role of new development to 'enhance' water quality of existing water resources.	The NPPF (2018) has been revised to indicate that development should "wherever possible, help to improve local environmental conditions such as air and water quality".

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1456, Rainford PC.	Rainford is prone to flooding and it is difficult to see how the stipulation that water flow rate remains the same will be achieved.	Policy LPC12 seeks to ensure that new development will not cause an unacceptable risk of flooding and water quality and sets out the requirements for developers to demonstrate how flood risk will be addressed.
E1491, NFU	The last sentence is confusing and should be re-written. What is riparian development? Attenuation is recognised but sometimes on farmland this can have significant implications for farmers	Comment noted. The phrase 'riparian' no longer appears in the policy.
E1561, Turley on behalf of Story Homes North West Ltd.	Support the ambition to ensure that flood risk arising from new development is attenuated, however, it is considered this should be determined on a site-by-site basis.	Support noted. The policy has been revised and is considered to include suitable criteria to determine when attenuation will be required.
E1488, Historic England	New development in inappropriate places may alter the hydrology of other areas, thereby potentially giving rise to concomitant threats to buried archaeology.	Comment noted. Clause 4 of the policy refers to the need to protect buried archaeology.
E1491, NFU	A future proofed progressive policy should recognise that flooding and "slowing the flow" will be more of an issue and it may require a local resolution linked to work on natural capital or eco-system services.	Comment noted. Policy LPC12 has been revised and is considered to include a suitable emphasis on these matters.

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1499, Natural England	Generally supportive but have some concerns that the policy does not recognise the need to protect habitats from water related impacts only minimise damage and should seek enhancements, would like to see this section, cross referenced with the Green Infrastructure section to ensure consistency and evidence of policy linkages are maintained.	Support noted. LPSD Policy LPC06 acknowledged the important role played by Biodiversity and Geodiversity in supporting the full range of ecosystem services provided by the landscape and interaction of species and their habitats, with their non-living environments.
E1500, Environment Agency.	There needs to be some consistency in regards to the reference to the Sankey Catchment Action Plan.	Comment noted
E1500, Environment Agency	Criterion 5 – needs amending to emphasise the need to attenuate and filter surface water, improving water quality and reducing peak flow during flooding.	Policy LPC12 has been revised to reflect this comment – see clause 5.
E1500, Environment Agency	Criterion 9 is confusing - it is not clear whether this is related to biodiversity and nature conservation or WFD. The two are linked but are not necessarily the same, depending on what exactly is meant by biodiversity asset/nature conservation.	Policy LPC12 has been revised for clarity.
E1500, Environment Agency	Criterion 10 also needs amending	Policy LPC12 has been revised for clarity.
E1500, Environment Agency	In regards to SUDs the wording needs to emphasise the need to attenuate and filter surface water, improving water quality and reducing peak flow during flooding and improve clarity in relation to the WFD.	LPC12 has been revised to reflect this comment.

POLICY LPC12 - FLOOD RISK AND WATER MANAGEMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1500, Environment Agency	Note that Biodiversity Action Plans have been superseded by the Government's Biodiversity 2020 national strategy.	Comment noted
E1502, United Utilities	Development within Groundwater Source Protection Zones should be in accordance with the Environment Agency position statement entitled 'Groundwater Protection: Principles and practice (GP3)'. The development should be supported by an appropriate risk assessment which considers the impact on the groundwater environment.	Comment noted
E1502, United Utilities	Development proposals should be supported by a construction management plan which sets out how the risk to the groundwater environment during any construction process will be managed.	Comment noted. This is addressed in clause 7 of the policy.
E1502, United Utilities	Developers will need to ensure that any water and wastewater assets will be protected from development that could compromise their physical integrity or effective maintenance. We would be keen to see this requirement incorporated into your planning policies.	This matter is addressed by clause 14 of the revised policy.

POLICY LPC13 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Nine developers strongly object to Part 2 - as they suggest it is unclear what justification or evidence there is for the requirement for a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regs, policy it appears overly onerous	The revised clause 4 of policy LPC13 requires proposals for new development within a strategic employment site or a strategic housing site to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s) unless this is shown not to be practicable or viable. This approach is considered to accord with the policy in the NPPF to promote the use of low carbon forms of energy.
E1489, HBF	Criterion 2. 1.- 'fabric first' approach is unjustified and contrary to national policy. The proposed policy requirement would have significant viability implications.	Policy LPC13 has been revised and does not refer to a 'fabric first' approach.
	Broadly supportive of policy (E1495, CPRE)	Support noted
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Support the opportunities presented through the deployment of decentralised, low carbon and renewable energy where there is sufficient mixed-use development to provide the necessary heat load.	Support noted
E1512, Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	Generally supportive but policy should not include a requirement that exceeds Building Regs.	Comment noted
E1563, Barton Willmore on behalf of Millar Homes	Further evidence is required to demonstrate that this Policy is sound, including testing through the Viability Assessment.	The LPSD is supported by an up-to-date viability assessment report (2018). This will be published as part of the evidence supporting the Plan.

POLICY LPC14 - MINERALS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Note that the western section of the land south west of J23 at Haydock is within a mineral safeguarding area for coal measures. Criteria 2 considers development in such areas, however the lower threshold for Green Belt sites should be removed and other exceptions allowing information submissions in support of development proposals should be retained.	Comment noted. The distinction between Green Belt and non-Green Belt sites has been removed.
E1562, Barton Willmore LLP on behalf of the Church Commissioners for England	Policy should state that allocated sites are exempt from MSAs (as implied in para 7.103). The policy should be more flexible and the benefits of development should be considered against the quantum of land potentially sterilised by non-minerals development.	Comment noted. The policy allows for a balanced consideration of a proposal's benefit. Non-mineral development may be permitted where the need for the proposed development outweighs the need to safeguard the mineral resource.
E1493, The Coal Authority	Criterion 2 - pleased to note that the policy defines the generic Mineral Safeguarding Areas, with a detailed surface coal resource area	Comment noted
E1493, The Coal Authority	Criterion 4 - welcomes the acknowledgement for the potential for future proposals for the exploitation of onshore oil and gas resources (including unconventional hydrocarbons)	Comment noted
	Broadly supportive of policy (E1495, CPRE)	Support noted

POLICY LPC15 – WASTE		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1495, CPRE	Broadly supportive of policy	Support noted

POLICY LPD01 - ENSURING QUALITY DEVELOPMENT IN ST.HELENS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1571, Indigo Planning on behalf of Barratt Homes	Reference of need to 'avoid loss of high quality soils' at point 2) i) not explained or justified and in the absence of evidence, we object to this particular part of the draft policy.	The reference to protection of soils has been retained as this is considered to be an important sustainability issue. The policy allows for loss of or damage to soils where justified by wider benefits.
E1498, Wildlife Trust for Lancashire, Manchester & North Merseyside	There is a notable absence of any reference to wildlife/ecology/biodiversity. There should be a requirement for all proposals to have regard to the ecology of the site and the surrounding area and for new development proposals to be accompanied by an ecological assessment.	This matter is covered extensively in other policies, for example: LPC06 (Biodiversity and Geological Conservation); LPC08 (Ecological Network); LPC09 (Landscape Protection and Enhancement); and LPC10 (Tree and Woodland).
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Significant concerns to criteria 3(ii) which requires new development to use local and recycled building materials. The wording of this policy is too prescriptive and criterion 3(ii) should be deleted.	The policy still encourages the use of recycled and/or locally sourced materials. This is by means of a cross reference to the Merseyside and Halton Joint Waste Local Plan, which is part of the adopted development plan.
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	Support noted. This is covered in policy LPA11 'Health and Wellbeing' and in other parts of the LPSD which relate to open space and green infrastructure networks.
	Fully support this policy.	Support noted

POLICY LPD01 - ENSURING QUALITY DEVELOPMENT IN ST.HELENS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1493, The Coal Authority	Criterion 2 (iv) - although not referring to coal mining legacy, this part is a welcome inclusion.	Comment noted
E1495, CPRE	Support this policy, the Council must promote a sense of pride in its places as new development comes through.	Support noted
	Part 3. ii. - should be amended and the words " <i>where possible</i> " should be added.	Comment noted
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.
E1493, The Coal Authority	Wish to highlight that 'unstable' should be taken to include land within the defined Coal Authority Development High Risk Area, and development proposals within this area should be accompanied by a Coal Mining Risk Assessment.	Comment noted
E1502, United Utilities	Council and the developer to consider proximity to existing United Utilities wastewater treatment works.	Comment noted

POLICY LPD02 - DESIGN AND LAYOUT OF NEW HOUSING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPD02
E1571, Indigo Planning on behalf of Barratt Homes	Wording introducing the policy unclear therefore object on this principle basis.	Policy LPD02 has been updated.
E1499, Natural England	There is a notable absence of any reference to ecology and biodiversity. There should be more reference in the policy to such matters.	This matter is covered extensively in other policies, for example: LPC06 (Biodiversity and Geological Conservation); LPC08 (Ecological Network); LPC09 (Landscape Protection and Enhancement); and LPC10 (Tree and Woodland).
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	Support noted. This is covered in policy LPA11 'Health and Wellbeing' and in other parts of the LPD02 which relate to open space and green infrastructure networks.
E1495, CPRE	Support the use of local materials, we are seeing too many copy book housing developments coming forward that are incongruous with the St.Helens locality.	Support noted. This approach is reflected in Policy LPD02.
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	There is significant overlap with policy LPD01.	Comment noted
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPD02, primarily policy LPC11.

POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPD03
E1492, Sport England	A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas. It is suggested that policy makes clear that the on-site open space requirement does not include outdoor sport but that off-site contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.	Supporting text has been revised to make clear that Open Space Standards do not apply to outdoor sports provision. The policy and supporting text has been revised with more detail added to offer greater clarity to developers over when the Council will expect new residential development to provide new open space, where and in what form.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	The requirements seem unduly prescriptive	The approach in policy LPD03 is consistent with national policies and guidance including the NPPF.
E1509, Nathaniel Lichfield and Partners on behalf of Taylor Wimpey UK Ltd.	Generally supportive, however, whilst reference is made in the sub-text to the provision requirements in SHUDP Policy GEN 6 'which have worked successfully', no justification is given in the policy for the requirement for 40m2 of open space per dwelling	Comment noted. Relevant evidence concerning this issue is set out in the St.Helens Economic Viability Assessment 2018.
E1499, Natural England	It is important for ecosystem services to have space to absorb rainwater, provide habitat and connections for wildlife, and space for people to play sport and spend time relaxing outdoors.	Comment noted
	Three developers suggested that further detail and robust justification and evidence for the open space requirements is needed	Policy LPD03 is supported by robust and up-to-date evidence in the St.Helens Open Space, Sports and Recreation Assessment
	Three developers suggested that provision should be on a site by site basis.	Policy LPD03 is robust and aligned with the NPPF.

POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	Two developers comment that the policy does not take into account the size of dwellings, their own private space or if there is any existing open space.	The local evidence supporting this policy is robust and consistent with national policies including the NPPF. The revised policy wording also takes account of whether there would be any deficiencies in open space provision in the area as a result of a development being implemented.

POLICY LPD04 - HOUSEHOLDER DEVELOPMENTS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1488, Historic England	Policy conveys no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.
E1488, Historic England	Development should take account of the status and significance of heritage assets	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.

POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
	There is no reference to the need to protect wildlife habitats in older buildings, for example bat roosts (E1499, Natural England)	This matter is adequately covered by policy LPC06, which seeks to protect wildlife habitats and protected species from harmful development.

POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1491, NFU	Welcome the reference to conversions and agricultural workers dwellings. However, the policy should go further and seek to promote diversification opportunities that will support farm businesses.	This matter is covered by clause 7 of Policy LPA02, which confirms that 'the Council will support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses'.
E1488, Historic England	Policy conveys no clear requirement for development to respect the status and significance of heritage assets and the context in which they are found (see para 137 of the NPPF).	Comment noted. Heritage issues are extensively covered in other parts of LPSD, primarily policy LPC11.

POLICY LPD06 - DEVELOPMENT IN PROMINENT GATEWAY LOCATIONS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E0442, Billinge Chapel End PC	Appears to be conflict between this policy and Policy LPC02.	Policy LPD06 is robustly prepared and is aligned with national and local policies.
E1483, Dickman Associates Ltd. on behalf of Legh Trust	Sites HS15 & HS16 both have strong boundaries with the M6 and as such the clients full land ownership should be included in the safeguarded area to ensure such a barrier is part of the scheme.	Sites HS15 and HS16 have been re-appraised in accordance with the Green Belt Review 2018. As a result of this process, and of the reduced housing requirement set by Policy LPA05, the LPSD proposes to keep the sites in the Green Belt. The reasons for this are set out in further detail in the Green Belt Review 2018.

POLICY LPD07 - DIGITAL COMMUNICATIONS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSP
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd) and Peel Energy	Object to the requirement for the provision of fibre enabled broadband. Media network providers should have installed the necessary infrastructure within a region and it is not for developers to meet this requirement.	This requirement is considered to be justified and is still included in the policy. The Government has brokered an agreement between Openreach and the Home Builders Federation to offer access to full fibre broadband for all new developments, free of charge for developments of over 30 dwellings registered from November 2016, or as part of a co funded initiative.
E1488, Historic England	The word 'normally' is unnecessary, it provides no control or clarification (part (iv))	Comment noted and addressed in the LPSP.

POLICY LPD08 - ADVERTISEMENTS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSP
None	None	N/A

POLICY LPD09 - AIR QUALITY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSP
E1495, CPRE	This policy is not strong enough, only focussing on not making air quality any worse. It should make firm commitments to work towards improved air quality.	Comments noted. The policy is considered to be sufficiently positive, through its promotion of sustainable modes of transport.

POLICY LPD09 - AIR QUALITY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPD09
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	Object to Criteria 2 as development proposals should assess the impact of potential emissions generated by the proposal on existing air quality levels. It should not be necessary to reduce existing air quality/pollution issues, unless this can be achieved as a further benefit of a proposal	Comment noted. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
LA399, Newton Resident & Friends Assoc.	Proposals will result in increase in traffic which will add to air pollution in the surrounding area - it is already deemed inadequate in High Street area.	Comment noted. Policies LPD09 and LPA07 address the issues of air quality and traffic impact respectively associated with planned development. Policy LPD09 seeks to ensure that development will not lead to a significant deterioration in local air quality.
E1499, Natural England	Generally supportive but would like to see the policy strengthened to recognise impacts on European and National sites. The policy does not take into account the cumulative impacts on air quality, from individual sites, in the context of European and National designated sites.	Support noted. Policy LPC06 has been revised to reflect these comments.
L0770, Parkside Action Group	Wholeheartedly support this policy	Support noted
E1461, Croft PC	Increased traffic volumes are likely to have a negative impact on air quality	Policies LPD09 and LPA07 address the issues of air quality and traffic impact associated with planned development.
E1464, Cllr De Asha	Proposed development at Rainhill will lead to a significant impact on air pollution and lead to dangerous levels of pollution for residents.	Policies LPD09 and LPA07 address the issues of air quality and traffic impact associated with planned development.

POLICY LPD09 - AIR QUALITY		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1494, Merseytravel	DEFRA published a new national Air Quality Plan, which is to be amended in line with EU regulations and as such that document could have implications for St.Helens as the LCR will be required to tackle the increasing air quality challenge.	Comment noted
POLICY LPD10 - HOT FOOD TAKEAWAYS		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1570, the Emerson Group on behalf of Orbit Investments (Properties) Ltd.	Object to the proposed exclusion zones for new hot takeaways, as it incorrectly presumes all takeaways are unhealthy. The policy as worded is too negative and the SPD was not tested through examination.	Policy LPD10 and its supporting text have been revised. However, the criteria concerning the location of hot food uses are retained. They are considered to be justified on the basis of evidence, and in order to promote healthy eating habits and reduce the rate of childhood obesity.
POLICY LPD11 - HEALTH AND WELLBEING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1492, Sport England	Policy generally supported subject to it being strengthened to include physical activity opportunities within the design of new developments in line with the 10 principles of Active Design.	This has been addressed in Policy LPD11 (clause 5).

POLICY LPD11 - HEALTH AND WELLBEING		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1503, Kingsland Strategic Estates Ltd	Support this Policy.	Support noted
L0770, Parkside Action Group	Completely support this policy.	Support noted
E1488, Historic England	An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.	Comment noted.
E1495, CPRE	Life expectancy in St.Helens is significantly lower than the national average. Access to good quality urban green space and local countryside is vital in the future to promote improved fitness of the population through walking, cycling and other leisure activities.	The provision of urban open space is covered under policies LPC05 and LPD03 of the LPSD.

DRAFT POLICIES MAP		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1518, Cass Associates on behalf of Redrow Homes Ltd.	The map does not exclude the land at Junction Road/Stanley Avenue from the Green Belt.	Comment noted. This site is still included in the Green Belt. The reasoning behind this decision is set out in the Green Belt Review 2018.

DRAFT POLICIES MAP		
Rep.ref.no.	Summary of main issue	How each main issue has been addressed in the LPSD
E1566, Cassidy + Ashton on behalf of FDL Packaging Group	Our site (FDL Packaging Site (Site Ref: 153-SHLAA 2016) is not covered by any site specific policy within the emerging Local Plan. The fact the site is unallocated for any land use could be seen as an indicator for flexibility in the future use and development of the site.	Comment noted
	The fact there are no proposed housing allocation sites on non-Green Belt land through the Draft policies maps is evidence of the significant shortfall in housing land supply. The situation in terms of Employment Land by comparison is considered to be less serious.	Comment noted
LPPO544, Pilkington Sailing Club	The clubhouse, carpark and dinghy compound at Eccleston Mere should be removed from the Policies Map as GB as it is included in the Open Space and Recreation Site designation as is associated infrastructure.	The boundaries of designated open space at Eccleston, Pilkington Sailing Club have been amended on the Policies Map to reflect the area that fulfils the open space function
	Key sites with planning permission for housing should be shown as being allocated for housing development on the Policies Map.	The largest sites with current planning permission are now marked on the LPSD Policies Map.

APPENDIX 1

Reference Index 1: List of respondents contributing to LPPO ‘Main Issues’ (and Ref. No.)

Barton Willmore.....	E1542
Barton Willmore on behalf of Andrew Cotton	E1554
Barton Willmore on behalf of Avenbury Properties.....	E1519
Barton Willmore on behalf of Church Commissioners for England.....	E1562
Barton Willmore on behalf of Jones Homes (North West) Ltd.....	E1543
Barton Willmore on behalf of Millar Homes	E1563
Bell Ingram Design Ltd. on behalf of Essar Oil.....	E1585
Bell Lane Plot Owners.....	E1504
Billinge & Seneley Green PC	LPPO801
Billinge Chapel End PC	E0442
Billinge PC.....	FP0260
Canal & River Trust.....	E1501
Carmel College	E0119
Cass Associates on behalf of Redrow Homes Ltd.	E1518
Cassidy + Ashton on behalf of FDL Packaging Group	E1566
Cassidy + Ashton on behalf of the Jones family	E1568
Cllr De Asha	E1464
Cllr Glover	E1460
Cllr Haw.....	E1470
Cllr K Deakin, St.Helens Borough Council - Earlestown Councillor.....	E1462
Cllr Long.....	E1468
Cllr McCauley	LPPO808
Cllr Mitchell (Burton & Winwick Ward).....	LPPO534
Cllr Preston, St.Helens Borough Council - Earlestown Councillor.....	E1463
Cllr Sims	E1466
Cllrs Bond, Burns & Banks (Haydock Ward Councillors).....	E1469
Cllrs Glover, Neal & Baines.....	E1467
Cllrs Gomez-Aspron, Bell & Dyer	E1457
Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	E1459
CPRE	E1495
Croft PC	E1461
Cronton PC	LPPO561
Culcheth and Glazenbury PC.....	E1453
Davis Meade on behalf of J. & J. Kay.....	L0861
De Pol Associated on behalf of Metacre Ltd.	E1564
Dickman Associates Ltd. on behalf of Legh Trust	E1483
DLP Planning Ltd. on behalf of Mr P. Reynolds	E1559
DPP Planning on behalf of Tesco Stores Ltd	E1575
Edward Landor Associates.....	E1479
Edward Landor Associates on behalf of Z. Mallik.....	E1472
Emery Planning on behalf of Wainhomes (North West) Ltd.	E1547
Environment Agency	E1500
Frank Marshall & Co. on behalf of Mr Platt.....	E1565
Frost Planning on behalf of English Land Ltd.....	E1517
Great Sankey PC	LPPO592
GVA on behalf of Miller Developments.....	E1572
Harris Lamb Property Consultancy on behalf of the Revelan Group Ltd.	FP0717
Helen Howie on behalf of Wallace Land Investments	E1555
Highways England.....	E1496
Historic England	E1488

Hollis Vincent	LPPO863
Home Builders Federation.....	E1489
Homes & Communities Agency.....	E1510
How Planning on behalf of Taylor Wimpey UK Ltd.....	E1544
Indigo Planning on behalf of Barratt Homes.....	E1571
J Rosbottom	E0584
JLL on behalf of Suttons Group.....	E1556
Jockey Club Racecourse Ltd.....	E1580
Kingsland Strategic Estates Ltd.	E1503
Knowlsey Council.....	E1446
Lane Head Residents' Association.....	E1532
Liverpool St.Helens FC	E1609
McAteer Associates Ltd. on behalf of Eccleston Homes Ltd.	LPPO585
McGinn MP	E1486
Merseyside Fire & Rescue Authority	LPPO140
Merseytravel.....	E1494
Michael Sparks associates on behalf of Canmoor Developments Ltd.....	E1521
MWA on behalf of J Murphy and Sons Ltd.	LPPO19
N. Cliffe	E1507
Nathaniel Lichfield & Partners on behalf of Taylor Wimpey UK Ltd.....	E1509
Nathaniel Lichfield and Partners on behalf of Bericote Properties Ltd.	E1512
National Farmers Union (NFU).....	E1491
National Farmers Union (NFU).....	E1497
Natural England	E1499
Network Rail.....	E1490
Newton Resident & Friends Assoc.....	LA399
Nexus Planning on behalf of BXB Ltd	E1569
Nexus Planning on behalf of NHS Property Services.....	E1548
Parish Cllr Trisha Long.....	E1400
Parkside Action Group	E0278
Parkside Action Group	L0770
Pegasus Group on behalf of Redrow Homes North West	E1560
Persimmon Homes North West.....	E1549
Peter Brett Assoc. on behalf of Smith Property Developments and Interland ...	E1557
Pilkington Sailing Club.....	L0863
Pilkington Sailing Club.....	LPPO544
PWA Planning on behalf of JMB Farming	E1508
PWA Planning on behalf of Mr L. Martin	E1484
Rainford Action Group.....	E1250
Rainford Action Group.....	LPPO588
Rainford Heritage Society	L0228
Rainford PC.....	E1456
Rainhill Civic Society	E0224
Rainhill PC	E1452
Residents Against The Development Of Green Belt - Rainhill	FP0456
Residents of French Fields.....	E1427
Ruth Jackson Planning on behalf of Fuavel/McMahon/Platt/Gascoyne	E1546
Ruth Jackson Planning on behalf of Gascoyne Holdings Ltd.	E1545
Save our Green Belt & Residents against Florida Farm Development.....	LB0001
Savills (UK) Ltd. on behalf of the Knowsley Estate	E1558
Savills on behalf of Crown Golf	E1567
Sefton Council.....	E1445
Spawforths on behalf of Network Space	E1482
Spawforths on behalf of Parkside Regeneration LLP	E1481
Sport England	E1492

The Coal Authority.....	E1493
The Emerson Group on behalf of Orbit Investments (Properties) Ltd.....	E1570
The Planning Bureau Ltd. on behalf of McCarthy & Stone	LPPO356
Torus Housing.....	LPPO538
Turley on behalf of Peel Holdings (Land and Property Ltd) and Peel Energy ...	E1511
Turley on behalf of Story Homes North West Ltd.	E1561
United Utilities	E1502
Wargrave Big Local.....	E1610
Warrington Borough Council	E1583
West Lancashire Council.....	E1447
Wigan Council	E1448
Wildlife Trust for Lancashire, Manchester & North Merseyside	E1498
Winwick PC	E1458
Y. Fovargue MP for Makerfield.....	E1465

Reference Index 2: Location of LPPO ‘Main Issue’ responses by Ref. No.

E0224	19, 33, 39, 76, 85, 173, 176
E0278	57, 62, 69, 136, 137, 193
E0442	24, 86, 87, 183, 192, 211, 227
E0584	162, 165
E1250	20, 40, 74, 76, 77, 113, 115, 129, 130, 164, 166, 168, 171, 186
E1400	25, 173, 177
E1427	25, 141, 142
E1445	28, 79, 132, 203
E1446	25, 39, 85, 149, 151, 178
E1447	28, 42, 76, 84, 184
E1448	41, 43, 52, 71
E1452	129, 173, 176
E1453	20, 39, 51, 57, 62
E1456	21, 111, 115, 163, 166, 169, 172, 186, 217
E1457	59, 64, 69, 84, 107, 108, 110, 111, 124, 129, 134, 154, 155, 157, 159, 161, 198, 212
E1458	20, 27, 58, 70, 77, 110, 155, 156, 157, 160, 161, 193
E1459	112, 115, 117, 130, 163, 166, 167, 169, 171, 200, 204
E1460	27, 42, 81, 104, 126, 133, 173, 175, 180
E1461	22, 67, 229
E1462	97, 126, 183
E1463	97, 124
E1464	101, 123, 175, 179, 229
E1465	23, 40, 47, 49, 50, 52, 55
E1466	28, 146, 148
E1467	16, 17, 28, 122, 123, 183
E1468	23, 28, 75, 133, 173, 175
E1469	28, 40, 53, 54, 56, 68, 71, 81, 204
E1470	17, 21, 23, 35, 78, 99, 118, 134, 149, 151, 198
E1472	32
E1479	22, 27, 29, 40, 114, 116, 134, 209
E1481	17, 29, 63, 64
E1482	19, 196, 197, 208
E1483	35, 72, 127, 152, 158, 160, 186, 187, 203, 225, 227
E1484	167
E1486	22, 28, 42, 64, 81, 194
E1488	16, 44, 58, 62, 68, 84, 102, 126, 127, 191, 193, 207, 210, 213, 214, 215, 216, 217, 223, 224, 226, 227, 228, 231
E1489	26, 132, 199, 200, 206, 220
E1490	84
E1491	19, 27, 43, 217, 227
E1492	35, 103, 110, 122, 190, 192, 209, 211, 222, 224, 225, 230
E1493	221, 223
E1494	33, 78, 184, 185, 194, 230
E1495	17, 19, 20, 36, 37, 38, 43, 47, 50, 58, 61, 68, 76, 81, 123, 131, 184, 188, 194, 212, 220, 221, 222, 223, 224, 228, 231
E1496	30, 38, 39, 60, 71, 81, 84, 184, 185, 188, 195
E1497	163, 164
E1498	28, 49, 51, 57, 65, 67, 87, 92, 106, 109, 111, 112, 117, 119, 136, 142, 147, 148, 149, 151, 152, 155, 156, 158, 161, 171, 175, 181, 207, 216, 222
E1499	18, 105, 116, 121, 191, 210, 211, 218, 224, 225, 226, 229
E1500	214, 218, 219

E1501	190, 197
E1502	41, 43, 189, 190, 219, 223
E1503	18, 20, 91, 144, 191, 200, 204, 210, 211, 212, 214, 215, 231
E1504	34, 144
E1507	105
E1508	33, 169, 170
E1509	13, 29, 93, 95, 98, 125, 144, 147, 205, 225
E1510	13, 41, 46
E1511	14, 15, 26, 41, 51, 69, 80, 81, 106, 124, 128, 131, 183, 184, 188, 191, 206, 220, 221, 222, 224, 228, 229
E1512	13, 14, 30, 36, 43, 48, 70, 128, 188, 220
E1517	66, 116, 172
E1518	32, 33, 231
E1519	39
E1521	27, 54, 56
E1532	59, 62
E1542	36, 37, 131, 133, 143, 202, 205
E1543	15, 18, 132, 157, 187, 205
E1544	15, 128, 147
E1545	182
E1546	182
E1547	18, 113, 133, 139, 161
E1548	23, 31, 109
E1549	31, 36, 82, 89, 189, 205
E1554	143
E1555	29, 33, 34, 83, 103, 122, 126, 176, 179, 180
E1556	83, 126, 201, 205
E1557	32, 39, 64
E1558	33, 37, 113, 114, 120, 132, 151, 167, 172
E1559	31, 131, 134, 145, 146
E1560	16, 24, 150, 202, 211
E1561	15, 18, 120, 121, 189, 190, 204, 217
E1562	18, 21, 32, 34, 128, 130, 164, 165, 183, 185, 187, 188, 192, 202, 204, 210, 213, 221
E1563	37, 42, 66, 116, 131, 172, 189, 208, 220
E1564	31, 83, 124, 129
E1565	182
E1566	27, 35, 42, 80, 206, 232
E1567	103, 104
E1568	83, 84, 182
E1569	23
E1570	196, 207, 208, 230
E1571	30, 91, 125, 126, 185, 186, 200, 203, 214, 216, 220, 222, 224
E1572	36, 46, 131, 136, 137
E1575	29, 32, 152, 198, 208
E1580	42, 134
E1583	29, 46, 60, 65, 71, 135, 137
E1585	49, 53, 96, 98, 107, 147, 154
E1609	121
E1610	157
FP0260	24, 88
FP0456	24, 40, 77, 101
FP0717	24, 27
L0228	25, 116, 164, 168, 216
L0770	40, 61, 62, 78, 193, 229, 231

L0861	96, 142
L0863	129, 149
LA399	22, 229
LB0001	26, 44, 79, 89, 138
LLPO538	30
LPPO140	188, 189
LPPO19	34, 140
LPPO356	200, 201
LPPO534	25
LPPO538	85, 200, 203, 206
LPPO544	149, 209, 232
LPPO561	178
LPPO585	112, 127, 153, 199
LPPO588	25, 26, 41
LPPO592	44, 135, 137
LPPO801	13, 26, 41, 72, 79
LPPO808	83
LPPO863	199, 203

APPENDIX 3**METHODS OF CONSULTATION EMPLOYED AT VARIOUS STAGES**

	Document preparation	Regulation 18 Stage	Post consultation feedback	Publication of Local Plan
Stakeholder Meetings	●		●	
Individual Consultation Letter/email		●		●
Publication in Community Magazine	●	●	●	●
Publication on Website		●	●	●
Public Notice ² or press release		●		●
Deposit in Public Buildings		●	●	●
Presentation offered to business and community groups		●	●	●
Consultation Letter/email to interest groups	●	●	●	●
Articles in Specialist Publications		●		●

² Where required by Regulation

APPENDIX 4

SPECIFIC CONSULTATION BODIES AS SET OUT IN THE 2012 LOCAL PLAN REGULATIONS

“specific consultation bodies” means the following—

- (a) the Coal Authority,
- (b) the Environment Agency,
- (c) the Historic Buildings and Monuments Commission for England (known as English Heritage),
- (d) the Marine Management Organisation,
- (e) Natural England,
- (f) Network Rail Infrastructure Limited (company number 2904587),
- (g) the Highways Agency,
- (h) a relevant authority any part of whose area is in or adjoins the local planning authority’s area,
 - (i) any person—
 - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and
 - (ii) who owns or controls electronic communications apparatus situated in any part of the local planning authority’s area,
- (j) if it exercises functions in any part of the local planning authority’s area—
 - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(9) or continued in existence by virtue of that section;
 - (ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989(10);
 - (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(11);
- (iv) a sewerage undertaker; and
- (v) a water undertaker;
- (k) the Homes and Communities Agency(12); and
- (l) where the local planning authority are a London borough council, the Mayor of London

APPENDIX 5

GENERAL CONSULTATION BODIES AS SET OUT IN THE 2012 LOCAL PLAN REGULATIONS

“general consultation bodies” means the following—

- (a) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area,
- (b) bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,
- (c) bodies which represent the interests of different religious groups in the local planning authority's area,
- (d) bodies which represent the interests of disabled persons in the local planning authority's area,
- (e) bodies which represent the interests of persons carrying on business in the local planning authority's area;

APPENDIX 6

LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT SCOPING STAGE

[N.B. 120 'private' individuals names have been excluded from this list.]

A Crithcley & Sons
Accent North West
Accountable Officer for St.Helens CCG
AIDAPT
Aimia Foods Limited
Al Amin Indian Takeaway
ALG Investments
Alliance Planning
Alps Group Ltd
Altius Property Development LLP
Anchor Housing Trust
Ancient Monuments Society
Ansar Homes Ltd
Ansdell Villas Road Residents Association
Arriva North West & Wales
Arts Council North West
Ash Grove Farm
Ashfield
Ashtons Green Community Allotment
Ashurst T & R
Ashurst Tenants & Residents Assoc
Avalon town Planning & Architectural Design Consultants
Avenbury Properties
Banks Property Group
Barratt Homes - Planning Manager
Barratt Homes (Manchester)
Barrow & Cook
Barrow Farm
Barton Willmore Planning Partnership
Bell Ingram
Bellway Homes Ltd (North West Division)
Beresford Adams
Bericote Properties Ltd.
Berrys Bros
Bickerstaffe Parish Council
Bidwells
Billinge Chapel End Parish Council
Billinge Community Library
Billinge Historical Society
Billinge Tenants and Residents Association
Bizspace

Bloor Homes
BNP Paribas Real Estate
Bold heath Equestrian Centre
Bold Parish Council
Bond Byran
Bovis Homes
Bradford & Northern Housing Association
Bridgewater Trust
Brimble Lea & Partners
British Trust for Conservation Volunteers North West Region
Broadway Malyan Ltd
Brunswick Road Tenants and Residents Association
Bryant Homes North West Ltd
Buckingham Portfolio Management Ltd
Burtonwood & Westbrook Parish Council
C B Richard Ellis Ltd
CA Planning
Caddick Development
Canal & River Trust
Canter Levin & Berg
Cantra New Street Tenants and Residents Association
Carr Mill and Clinkham Wood Tenants & Residents Association
Carter Jonas LLP
Cass Associates
Cass Associates
CGMS Consulting
Chair of Ansdell Villas Road Residents Association
Chair of Friends of Victoria Park
Chair of Learning in St.Helens Group
Chair of Safer St.Helens Group
Charlton House Farm
Cheshire Police
Cheshire West and Chester Council
Chester Lane Centre Local History Group
Chris Thomas Ltd
Church Commissioners for England
Civic Trust (Northern Office)
Civil Aviation Authority
Civitas Planning
Clark Planning Consultants Ltd
Cliff Walfingham
Commercial Estates Group
Common Estate Tenants and Residents Association
Communities Agency
Concept Developments
Cornell Group
Cory Environmental
Cosey Homes

Cottrell Commercial
Council For The Protection Of Rural England (CPRE) (Lancashire Branch)
Country Land and Business Association
Countryside Properties
CPRE
Croft Parish Council
Cronton Parish Council
Cuerdley Parish Council
Culcheth & Glazebury Parish Council
Cunningham Planning
Dalton Warner Davis LLP
David L Shaw town Planning Consultant
David Wilson Homes
De Pol Associates Ltd
Deloitte Real Estate
Derek Hicks & Thew Partnership
Design Council
Development Executive
Development Solutions
DfT - Regional & Local Transport Delivery
Dickman Associates Ltd
Diocese of Liverpool
Director of Commissioning for NHS England (Merseyside)
Disability Advice & Information St.Helens
Dixon Webb Property Consultants
DK Architects
DPDS Consulting Group
DPP One Ltd
Drivers Jonas Deloitte
DTZ
E Cook & Sons
Easter Developments Ltd
Eccleston Hall Management Company
Eccleston Parish Council
Elan Homes
Electricity North West
Electrovision Ltd
Elm Construction
Emersons
Emery Planning Partnership
English Heritage (North West Region)
Environment Agency
Environmental Advisory Service (EAS)
ESSAR OIL UK (formerly SHELL UK) (c/o Bell Ingram)
Fairhurst
Fire & Rescue Service
Fisher German
FJH Associates Ltd

Forestry Commission
Forster and Company
FPCT LLP
Frank Marshall and Company
Frost Planning Ltd
Fusion on line limited
G L Hearn Property Consultants
G V A Grimley
Garswood Community Library
Garswood Gates Farm
Gladman Developments
Great Sankey Parish Council
Greater Manchester Police
Greater Manchester Police Commissioner
Green Edge
Green Pastures
Gregory Gray Associates
Greystar Europe
GVA Grimleys Ltd
Halton & St.Helens VCA
Halton Borough Council
Halton Primary Care Nhs Trust
Hammerson PLC
Harris Lamb
Hate Crime Co-ordinator
HCA
Helena Housing
Helena Partnership
Henderson Homes Ltd C/o Agent
Heys House Farm
Higham & Co
Higher Barrowfield Farm
Highway Authority (Cheshire West & Chester)
Highway Authority (Halton)
Highway Authority (Knowsley)
Highway Authority (Lancashire)
Highway Authority (Liverpool)
Highway Authority (Sefton)
Highway Authority (St.Helens)
Highway Authority (Warrington)
Highway Authority (Wigan)
Highway Authority (Wirral)
Highways Agency
Himor Group
Holliss Vincent
Holmes-Antill
Home Builders Federation Ltd
Homes & Communities Agency

Hourigan Connolly
Housing 21
How Planning
Hutchinson 3G UK Limited
ID Planning
Improving St.Helens
Indigo Planning Ltd
J Murphy & Sons Ltd
JASP Planning Consultancy Ltd
JB & B Leach
JLPS
Job Centre Plus
Jones Homes
Jones Lang Lasalle
JPE Consultancy
JWPC Ltd
KDP Architects
Keith Swain Design
King Sturge LLP
KKA Ltd
Knowsley MBC
Lambert Smith Hampton
Lancashire County Council
Lancashire County Property Group
Lancashire Police
Lancashire Wildlife Trust/The Wildlife Trust for Lancashire, Manchester and North Merseyside
Langtree Group plc
Lawrenson Associates
Legh Family Estates
Leith Planning Ltd
Lex Northwest Ltd
Liverpool Airport Plc
Liverpool City Council
Local Development Plans
Local Enterprise Partnership
Local Nature Partnership
Lowe Property Developments Ltd
Marine Management Organisation
Marshall Surveyors
Matthews and Goodman LLP
Mayor of London
Maypole Barn
MCP Planning
Meller Braggins
Mersey Forest
Mersey Valley Golf and Country Club Ltd
Merseycare NHS Trust

Merseyside Environmental Advisory Service
Merseyside Fire & Rescue Authority
Merseyside Industrial Heritage Society
Merseyside Police
Merseyside Police (St.Helens)
Merseyside Traveller Forum Irish Community Care
Merseyside Waste Disposal Authority
Merseytravel
Michael Sparks Associates
Miller Homes
Mineral Products Association
Mobile Operators Association c/o Mono Consultants Ltd
Morley Estates
Morris Homes
Morston Assets Ltd
MPSL Planning and Design Ltd
Nathaniel Lichfield Partnership
National Electricity Power Authority
National Farmers Union
National Federation of Gypsy Liaison Groups
National Grid
National Housing Federation
Natural England
NBS Construction
Network Rail
Newton and Earlestown Community Group
Newton le Willows Friends & Residents Association
Newton Residents Association
NHS Halton & St.Helens
NHS North West
NHS Property Services
NLP
North West Ambulance Service
North West Museum of Road Transport
Npower Renewables Ltd
NW Planning Aid
O2
Office of the Police and Crime Commissioner for Merseyside
Open Spaces Society
Orange PCS Ltd
Osborne Clarke
Owen Ellis Architects
P Wilson & Company
Parkside Action Group
PCT
Peacock and Smith Ltd
Peel Investments (north) Ltd
Peel Land & Property

Penketh Parish Council
Persimmon Homes
Philips Ryley & Co LLP
Pickard Finlason Partnership
Pilkington
PLANIT-IE
Planning Aid
Planware Ltd
Powergen
Prescot town Council
Principal Arts Officer (Acting)
Promised Land Farm
Property Surveyor
Rainford Allotment Association
Rainford Civic Society
Rainford Community Library
Rainford Hall Estate Ltd
Rainford Parish Council
Rainhill Civic Society
Rainhill Parish Council
Rainhill Railway & Heritage Society
Rapleys LLP
Red Bank Schools Ltd
Red Delph Farm
Redcat Property Investments Ltd
Redrow Homes (Lancashire) Ltd
Redrow Homes (North West) Ltd
Renova Developments
Revelan Group
Revelan UK Ltd
RG+P
Riverside
Rocktownsend
Roman Summer Associations Ltd
Rowland Homes
Royal Society for the Protection of Birds (RSPB)
Russell Homes (UK) Ltd
Salvation Army Housing Association
Sanderson Weatherall LLP
Sankey Canal Restoration Society
Savills
Sefton Council
Seneley Green Parish Council
Sherdley Estates
Sherdley Remec Ltd
SHINE
Showmen's Guild of Great Britain
Silcocks Amusements

Simonswood Parish Council
Smiths Gore
Social Care Housing & Health Directorate
Spawforth Associates
Sport England (North West)
SSA Planning
ST Group LTD
St.Helens & Knowsley Hospital Trust
St.Helens Age Concern
St.Helens CEN Coordinator
St.Helens Chamber
St.Helens Coalition of Disabled People
St.Helens College
St.Helens District Sports Council
St.Helens Heritage Network
St.Helens Historical Society/St.Helens Assoc. for Research into History
St.Helens Multi-Cultural Group
St.Helens Chamber of Commerce - Director of Business Services
St. Peter's C.E. Primary school
St.Helens Cooperative Community Members Group
St.Helens Green Party
St.Helens LSP
Steven Abbott Associates
Stewart Ross Associates
Storey Homes
Sustainability Forum
Sustainable St.Helens Forum
Suttons Group
Suttonside Farm
Swindell's Roofing
T Mobile UK Ltd
T&TK Drinkall
Taylor Wimpey UK Ltd
Taylor Woodrow Developments Ltd
Taylor Young
Temptation House
Terence O'Rourke
Tesni Homes
The Barracks
The Coal Authority
The Garden Centre Company c/o Gregory Gray Associates
The Garden History Society
The Gauchwin Group
The Gypsy Council for Education Culture Welfare and Civil Rights
The Haydock Park Racecourse Company Ltd
The Mersey Forest
The Office of Rail Regulation
The Planning Studio

The Stanley Estate & Stud Company
The Theatres Trust
The Winwick Educational Foundation
The Woodland Trust
Thomas Jones & Sons
Torus Housing
Transport for London
Traveller Law Reform Project and Friends, Families and Traveller
Tree tops
Turley Associates
Unifrax Ltd. (UK)
United Co-op Ltd (Property Division)
United Utilities PLC
United Utilities Property Solutions
Upholland Parish Council
Viridor Waste Management
Vodafone
Wainhomes (North West) Ltd
Wainhomes Developments Ltd
Walton & Co (Planning Lawyers) Ltd
Warrington Borough Council
West Lancs District Council
Whiston town Council Offices
White Peak Planning
White Young Green
Wigan Council
William Fishwick & Son Ltd
Willowbrook Hospice
Windle Farm
Windle Parish Council
Winwick Parish Council
Wirral MBC
Woodhouse Farm
Woodland Trust
Woodland Trust - Government Affairs Officer (Local)
Worthington Land Settlements

APPENDIX 7

LIST OF CONSULTEES INVITED TO MAKE REPRESENTATIONS AT PREFERRED OPTIONS STAGE

[N.B. 237 'private' individuals names have been excluded from this list.]

A Crithcley & Sons
Accent North West
AGMA
AIDAPT
Al Amin Indian Takeaway
ALG Investments
Alps Group Ltd
Altius Property Development LLP
Anchor Housing Trust
Ancient Monuments Society
Ansar Homes Ltd
Arcus Consultancy Services Ltd
Arriva North West & Wales
Arts Council North West
Ash Grove Farm
Ashfield
Ashtons Green Community Allotment
Ashurst T & R
Ashurst Tenants & Residents Assoc
Avalon town Planning & Architectural Design Consultants
Avenbury Properties
Banks Property Group
Barrow & Cook
Barrow Farm
Barton Willmore
Bell Ingram
Bell Ingram Limited
Bellway Homes Ltd (North West Division)
Bericote Properties Ltd.
Berrys Bros
Bickerstaffe Parish Council
Bidwells
Billinge Chapel End Parish Council
Billinge Community Library
Billinge Historical Society
Billinge Tenants and Residents Association
Bizspace
Bloor Homes
BNP Paribas Real Estate
Bold Heath Equestrian Centre
Bold Parish Council

Bond Byran
Bovis Homes
Bradford & Northern Housing Association
Bridgewater Trust
Brimble Lea & Partners
British Trust for Conservation Volunteers North West Region
Broadway Malyan Ltd
Brunswick Road Tenants and Residents Association
Bryant Homes North West Ltd
Burtonwood & Westbrook Parish Council
C B Richard Ellis Ltd
CA Planning
Caddick Development
Canal & River Trust
Canter Levin & Berg
Cantra New Street Tenants and Residents Association
Carr Mill and Clinkham Wood Tenants & Residents Association
Cass Associates
CGMS Consulting
Chair of Ansdell Villas Road Residents Association
Chair of Friends of Victoria Park
Chair of Learning in St.Helens Group
Chair of Safer St.Helens Group
Charlton House Farm
Cheshire West and Chester Council
Chester Lane Centre Local History Group
Civic Trust (Northern Office)
Civil Aviation Authority
Civitas Planning
Clark Planning Consultants Ltd
Cliff Walfingham
Commercial Estates Group
Common Estate Tenants and Residents Association
Communities Agency
Concept Developments
Cornell Group
Corporate and Financial Affairs Department, EE
Cory Environmental
Cosey Homes
Cottrell Commercial
Council For The Protection Of Rural England (CPRE) (Lancashire Branch)
Country Land and Business Association
Countryside Properties
CPRE
CPRE Lancashire
CPRE St.Helens
Croft Parish Council
Cronton Parish Council

Cuerdley Parish Council
Cuerdly Parish Council Warrington
Culcheth & Glazebury Parish Council
Cunningham Partnership
Dalton Warner Davis LLP
David L Shaw town Planning Consultant
David Wilson Homes
De Pol Associates
Design Council
Development Solutions
Dickman Associates Ltd
Diocese of Liverpool
Director Environmental Protection
Director of Commissioning for NHS England (Merseyside)
Disability Advice & Information St.Helens
Dixon Webb Property Consultants
DK Architects
DPP One Ltd
Drivers Jonas Deloitte
DTZ
E Cook & Sons
Eccleston Hall Management Company
Eccleston Parish Council
Elan Homes
Electricity North West
Electrovision Ltd
Elm Construction
Emerson
Emery Planning Partnership
EMF Enquires
English Heritage (North West Region)
Environment Agency
Environmental Advisory Service (EAS)
ESSAR OIL UK (formerly SHELL UK) (c/o Bell Ingram)
Fairhurst
Fire & Rescue Service
Fisher German
FJH Associates Ltd
Forestry Commission
FPCT LLP
Frank Marshall and Company
Frost Planning Ltd
G L Hearn Property Consultants
G V A Grimley
Garswood Community Library
Garswood Gates Farm
Gladman Developments
Great Brighams

Great Sankey Parish Council
Greater Manchester Police
Greater Manchester Police Commissioner
Green Edge
Green Pastures
Greystar Europe
GVA Grimley
GVA Grimleys Ltd
Halton & St.Helens VCA
Halton Borough Council
Halton Primary Care Nhs Trust
Hammerson PLC
Hate Crime Co-ordinator
HCA
Helena Housing
Helena Partnership
Helena Partnerships Head Office
Henderson Homes Ltd C/o Agent
Heys House Farm
Higher Barrowfield Farm
Highway Authority (Cheshire West & Chester)
Highway Authority (Halton)
Highway Authority (Knowsley)
Highway Authority (Lancashire)
Highway Authority (Liverpool)
Highway Authority (Sefton)
Highway Authority (Warrington)
Highway Authority (Wigan)
Highway Authority (Wirral)
Highways Agency
Himor Group
Holliss Vincent
Home Builders Federation Ltd
Homes & Communities Agency
Hourigan Connolly
Housing 21
How Planning
ID Planning
Improving St.Helens
Indigo Planning Ltd
J Murphy & Sons Ltd
JB & B Leach
JLPS
Job Centre Plus
Jones Homes (North West) Limited
Jones Lang LaSalle
JPE Consultancy
JWPC Ltd

KDP Architects
Keith Swain Design
King Sturge LLP
Kingsland Strategic Estates
KKA Ltd
Knowsley MBC
Lambert Smith Hampton
Lancashire County Council
Lancashire Police
Lancashire Wildlife Trust/The Wildlife Trust for Lancashire, Manchester and North Merseyside
Langtree group plc
Lawrenson Associates
Lex Northwest Ltd
Liverpool Airport Plc
Liverpool City Council
Local Development Plans
Local Enterprise Partnership
Local Nature Partnership
Love Bros
Lowe Property Developments Ltd
Marine Management Organisation
Mayor of London
Maypole Barn
McAteer Associates Ltd
MCP Planning
Meller Braggins
Mersey Forest
Mersey Valley Golf and Country Club Ltd
Merseycare NHS Trust
Merseyside Environmental Advisory Service
Merseyside Fire & Rescue Authority
Merseyside Industrial Heritage Society
Merseyside Police
Merseyside Police (HQ)
Merseyside Police (St.Helens)
Merseyside Traveller Forum Irish Community Care
Merseyside Waste Disposal Authority
Merseytravel
Michael Sparks Associates
Mineral Products Association
Morley Estates
Morris Homes (North) Limited
MPSL Planning and Design Ltd
Nathaniel Lichfield & Partners
National Farmers Union - Environment & Land Use Advisor
National Farmers Union NE & NW Regions
National Federation of Gypsy Liaison Groups

National Grid
Natural England
NBS Construction
Network Rail
Newton and Earlestown Community Group
Newton le Willows Friends & Residents Association
NHS Halton & St.Helens
NHS North West
NHS Property Services
NLP
North West Museum of Road Transport
Npower Renewables Ltd
NW Planning Aid
O2
Office of the Police and Crime Commissioner for Merseyside
Open Spaces Society
Osborne Clarke
Owen Ellis Architects
P Wilson & Company
Parkside Action Group
Peacock and Smith Ltd
Peel Investments (north) Ltd
Peel Land & Property
Penketh Parish Council
Persimmon Homes
Pickard Finlason Partnership
Pilkington
PLANIT-IE
Planning Aid
Planware Ltd
Powergen
PPS Group
Prescot town Council
Rainford Allotment Association
Rainford Civic Society
Rainford Community Library
Rainford Hall Estate Ltd
Rainford Parish Council
Rainhill Civic Society
Rainhill Parish Council
Rainhill Railway & Heritage Society
Rapleys LLP
Red Bank Schools Ltd
Red Delph Farm
Redcat Property Investments Ltd
Redrow Homes (Lancashire) Ltd
Redrow Homes (North West) Ltd
Revelan UK Ltd

Riverside
Rocktownsend
Roman Summer Associations Ltd
Rowland Homes
Royal Society for the Protection of Birds (RSPB)
Russell Homes (UK) Ltd
Salvation Army Housing Association
Sankey Canal Restoration Society
Savills
Secretary of Ansdell Villas Road Residents Association
Sefton Council
Seneley Green Parish Council
Sherdley Estates
Sherdley Remec Ltd
Showmen's Guild of Great Britain
Silcocks Amusements
Simonswood Parish Council
Smiths Gore
Social Care Housing & Health Directorate
Spawforth Associates
Sport England (North West)
SSA Planning
St.Helens & Knowsley Hospital Trust
St.Helens Age Concern
St.Helens CEN Coordinator
St.Helens Chamber
St.Helens Coalition of Disabled People
St.Helens Council - Urban Regeneration & Housing - Inward Investment
St.Helens District Sports Council
St.Helens Heritage Network
St.Helens Historical Society/St.Helens Assoc. for Research into History
St.Helens Multi-Cultural Group
St.Helens Chamber of Commerce - Director of Business Services
St. Peter's C.E. Primary school
St.Helens Cooperative Community Members Group
St.Helens Green Party
St.Helens LSP
Steven Abbott Associates
Stewart Ross Associates
Storey Homes
Stratus Environmental Limited
Sustainability Forum
Sustainable St.Helens Forum
Suttons Group
Suttonside Farm
Swindell's Roofing
T Mobile UK Ltd
T&TK Drinkall

Taylor Wimpey - Strategic Land and Planning Manager
Taylor Wimpey UK Ltd
Taylor Woodrow Developments Ltd
Taylor Young
Temptation House
Terence O'Rourke Ltd
The Barracks
The Coal Authority
The Garden Centre Company c/o Gregory Gray Associates
The Garden History Society
The Gauchwin Group
The Gypsy Council for Education Culture Welfare and Civil Rights
The Haydock Park Racecourse Company Ltd
The Home Builders Federation
The Mersey Forest
The Office of Rail Regulation
The Planning Studio
The Stanley Estate & Stud Company
The Theatres Trust
The Winwick Educational Foundation
The Woodland Trust
Thomas Jones & Sons
Torus Housing
Transport for London
Traveller Law Reform Project and Friends, Families and Traveller
Tree Tops
Turley Associates
Unifrax Ltd. (UK)
United Utilities
United Utilities Property Solutions
Upholland Parish Council
Vodafone
Wain Developments - Strategic Land Manager
Wainhomes (North West) Ltd
Walton & Co (Planning Lawyers) Ltd
Warrington Borough Council
West Lancs District Council
Whiston town Council Offices
White Peak Planning
Wigan Council
William Fishwick & Son
Willowbrook Hospice
Windle Farm
Windle Parish Council
Winwick Parish Council
Wirral MBC
Woodhouse Farm
Woodland Trust

Woodland Trust - Government Affairs Officer (Local)
Wyevale Garden Centres Ltd



St.Helens Council

Place Services

Development Plans

Town Hall

Victoria Square

St.Helens

WA10 1HP

Tel: 01744 676190

Minicom: 01744 671671


Email: planningpolicy@sthelens.gov.uk

→ www.sthelens.gov.uk/localplan

Please contact us to request translation of Council information into Braille,
audio tape or a foreign language.

For more information, visit: www.sthelens.gov.uk/localplan

APPENDIX 13: LPSD COMMENTS FORM & GUIDANCE NOTE

 St. Helens Council	St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form	Ref: LPSD (For official use only)
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Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address:	Address:
Postcode:	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: Date:

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes <input type="checkbox"/> (Via Email) No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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

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

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

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

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

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

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

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>



6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please continue on a separate sheet if necessary

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



Guidance Note to accompany the Representation Form

(This note is based in part on the advice of the Government's Planning Inspectorate in "Procedural Practice in the Examination of Local Plans" June 2016 – available at <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice> – with updates and locally specific information inserted as necessary)

1. Introduction

- 1.1 The St Helens Borough Local Plan 2020-2035: Submission Draft ('the **Local Plan**') is published in order for representations to be made. All representations must be received by the Council before 5.00pm on 13th May 2019. This replaces the previous deadline of 5pm Monday 13th March 2019. This extension will apply for all individuals and groups across the borough. If you have already made a comment, you do not need not make repeated comments. All comments that were originally submitted will be taken into consideration.
- 1.2 Later in 2019, the Council intends to submit the Local Plan to the Government. The Plan will then be examined by a Government Planning Inspector. All representations will be considered by the Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended)⁷ (**PCPA**) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to cooperate and is sound.

2. Legal Compliance and Duty to Cooperate

- 2.1 The Inspector will first check that the Plan meets the **legal requirements** under section 20(5)(a) of the PCPA and the **duty to cooperate** under section 20(5)(c) of the PCPA before moving to the test of soundness.
- 2.2 You should consider the following before making a representation on **legal compliance**:

⁷ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

- The Local Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the Local Plans and other documents it proposes to produce. It will set out the key stages in the production of any Plans which the Council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations. The LDS for St Helens is available on the Council website at www.sthelens.gov.uk/localplan and at its main offices.
- The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI sets out the Council's strategy for involving the community in the preparation and revision of Local Plans, other planning documents and the consideration of planning applications.
- The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations)⁸. On publication, the Council must publish the documents prescribed in the Regulations and make them available at its principal offices and on its website. The Council must also notify the various persons and organisations set out in the Regulations and any persons who have requested to be notified.
- The Council is required to provide a Sustainability Appraisal Report when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental and economic factors.

2.3 The **duty to cooperate** requires the Council to (in summary) '*...engage constructively, actively and on an ongoing basis...*' with neighbouring local authorities and other specified public bodies when preparing a local plan. The duty relates to strategic matters. You should consider the following before making a representation on compliance with the duty to cooperate:

- The Council will be expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not

⁸ View at <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

3.1 Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF) (July 2018). The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

3.2 If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General Advice

- 4.1 If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make it clear in what way the Plan or part of the Plan is not sound having regards to the legal compliance, duty to cooperate and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified.
- 4.2 Representations should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.
- 4.3 Where there are groups who share a common view on how they wish to see a Plan modified, it would be helpful for that group to send a single representation which represents the view, rather than a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

APPENDIX 14: STATEMENT OF REPRESENTATION

ST HELENS BOROUGH LOCAL PLAN 2020 – 2035

Statement of Representation Procedure and Availability of Documents St Helens Council

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Regulation 19)

Introduction

St Helens Council is preparing a new Local Plan. This statement sets out details of the Plan and how you may submit comments (or ‘representations’) on it.

Title of Document, Subject Matter & Area Covered

The new Plan will be called the ‘St Helens Borough Local Plan 2020-2035’. It will cover the whole of the Borough of St Helens, and will include:

- a vision and objectives setting out what type of place St Helens should be in 2035 and beyond;
- strategic policies guiding the future development and use of land (for housing, employment, retail and other uses);
- allocations of sites for particular types of development;
- areas where development is to be constrained; and
- detailed policies to help guide the determination of planning applications.

How you may view the Plan documents

The current version of the emerging Plan is known as the **St Helens Borough Local Plan 2020-2035: Submission Draft**. Copies of the following documents will be made available for public inspection until 5.00 pm on Wednesday 13th March 2019:

- the St Helens Borough Local Plan 2020-2035: Submission Draft;
- supporting Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment documents;
- evidence base reports and other supporting documents which underpin the Plan; and
- comments forms, guidance notes and Frequently Asked Questions (FAQs).

These documents can be viewed on the website at www.sthelens.gov.uk/localplan or by visiting Ground Floor reception, St. Helens Town Hall, St Helens WA10 1HP from 8.30am – 5.15pm Monday to Friday. The Plan and some of the supporting documents will also be available in hard copy at all libraries in St Helens Borough (please check local branch for opening times or visit www.sthelens.gov.uk/libraries).

Submitting representations on the Plan

You may submit comments (known as ‘representations’) on the Plan or any of its supporting documents at any time before **5.00 pm on Wednesday 13th March 2019**. Please note that late representations cannot be accepted.

ST HELENS BOROUGH LOCAL PLAN 2020-2035 CONSULTATION STATEMENT (MARCH 2020)

It is recommended that representations are made by completing the Council's Publication Stage Representation Form with the aid of the guidance notes (available at the website, locations and times referred to above). Representations must be sent by:

- post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or
- hand delivery to the **St Helens Town Hall Ground Floor reception** from 8.30am – 5.15pm Monday to Friday
- email to planningpolicy@sthelens.gov.uk; or
- using the on-line form at www.sthelens.gov.uk/localplan.

Drop in sessions

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for further details.

Next steps

It is proposed that, later in 2019, the Plan, all supporting documents and any representations received within the representations period, will be submitted, with a summary of the main issues raised in the representations, to the Secretary of State for Housing, Communities and Local Government. The Plan will then be examined by a Government Inspector, who will decide whether the Council may adopt it (with or without modification). The Council proposes to adopt the Plan in 2020.

Your right to request to be notified of further progress

Any representation which you submit may be accompanied by a request to be notified at a specified address of any of the following:

- the submission of the St Helens Borough Local Plan 2020-2035 for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- the publication of the recommendations of the Planning Inspector appointed to carry out an independent examination of the Plan; and
- the adoption of the Plan.

Data protection

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

**PAUL SANDERSON,
STRATEGIC DIRECTOR OF PLACE SERVICES**

APPENDIX 15: EXAMPLES OF POSTERS AND LEAFLETS DISTRIBUTED DURING THE LPSD CONSULTATION



ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

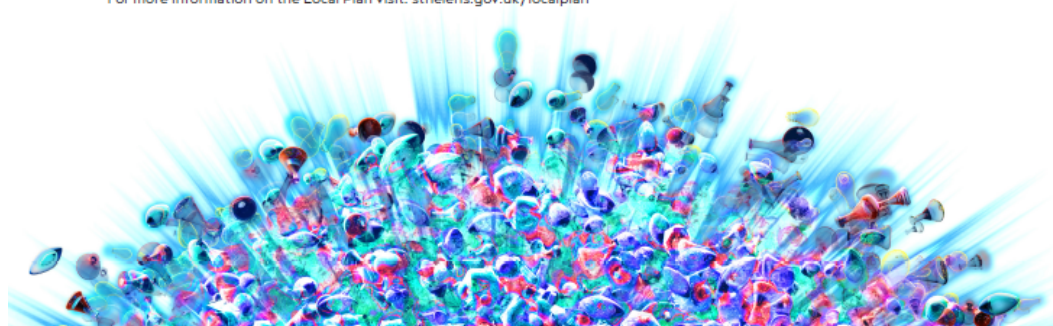
HAVE YOUR SAY ON ST HELENS LOCAL PLAN

**We have prepared the next stage of our new Local Plan,
known as the Submission Draft**

We are holding a number of local drop in sessions in neighbourhoods across St Helens. These sessions are open to all and will give you an opportunity to ask questions about the Local Plan and how to make your comments.

St Helens Town Hall, St Helens Town Centre	Tuesday 22nd January	12pm – 5pm
St Ann's Millennium Centre, Rainhill	Tuesday 29th January	2pm – 6.30pm
St John Vianney School, Thatto Heath	Tuesday 12th February	2pm – 6.30pm
Newton Library, Newton-le-Willows	Thursday 14th February	2pm – 6.30pm
St Julie's Church Hall, Eccleston	Monday 18th February	2pm – 6.30pm
Billinge Road Community Hall, Garswood	Wednesday 20th February	2pm – 6.30pm
Haydock Library, Haydock	Monday 25th February	2pm – 6.30pm
Chester Lane Library, Sutton Manor	Tuesday 26th February	2pm – 6.30pm
Rainford Village Hall, Rainford	Thursday 28th February	2pm – 6.30pm

For more information on the Local Plan visit: sthelens.gov.uk/localplan



ST HELENS BOROUGH LOCAL PLAN 2020-2035 CONSULTATION STATEMENT (MARCH 2020)



ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

A BALANCED PLAN FOR A BETTER FUTURE

WHY DO WE NEED A LOCAL PLAN?

In St Helens we need a new local plan to show where development is planned, for example for new employment and housing, over the next 15 years.

We must have an up to date adopted local plan to give residents and communities some certainty over where development may take place, what infrastructure such as roads are needed to support it and to prevent decisions being made on developments which may not be in the best interests of the local area.

In early 2017, we held a public consultation on the Preferred Options of the plan, from which we received nearly 6,000 responses.

We have reviewed and considered all the responses we received. We have listened to what you have told us you want to see and have reviewed our approach against the changing requirements of Government policy.

We have now developed the next stage of the plan, known as the Submission Draft, which allows for balanced growth, whilst also protecting and enhancing the natural environment.

HOW CAN I GET INVOLVED

The Submission Draft of the Local Plan is available for you to make comments on until **Wednesday 13th March 2019, 5pm**.

There are a number of ways in which you can provide your comments to us:

- Online at www.sthelens.gov.uk/localplan
- By email to planningpolicy@sthelens.gov.uk
- By post or hand delivery to: **Local Plan, St. Helens Council, Town Hall, Victoria Square, St Helens WA10 1HR**

We advise that you use the forms provided (available via the above contact details or at the following drop-in sessions) to submit your comments.

ST HELENS LOCAL PLAN DROP-IN SESSIONS

St Helens Town Hall, St Helens Town Centre	Tuesday 22nd January	12pm - 5pm
St Ann's Millennium Centre, Rainhill	Tuesday 29th January	2pm - 6.30pm
St John Vianney School, Thatcho Heath	Tuesday 12th February	2pm - 6.30pm
Newton Library, Newton-le-Willows	Thursday 14th February	2pm - 6.30pm
St Julie's Church Hall, Eccleston	Monday 18th February	2pm - 6.30pm
Billinge Road Community Hall, Garswood	Wednesday 20th February	2pm - 6.30pm
Haydock Library, Haydock	Monday 25th February	2pm - 6.30pm
Chester Lane Library, Sutton Manor	Tuesday 26th February	2pm - 6.30pm
Rainford Village Hall, Rainford	Thursday 28th February	2pm - 6.30pm

FIVE KEY PRIORITIES FOR A BALANCED PLAN

Regenerating and growing St Helens

This plan will seek to strengthen our local economy, promote business growth, retention and investment. It will also seek to increase employment opportunities and reduce the number of people not in work.

Continuing commitment to brownfield first

We have been working hard to identify and bring back into use suitable brownfield sites. Our proactive work on brownfield sites now means 59% of the borough will remain in the Green Belt and is therefore protected from most forms of new development.

Revitalising and strengthening our town and district centres

We will continue to build on our vision for St Helens Town Centre and develop a strategy for Earlestown Town Centre, building on its strength as a market town, to meet the needs of the community in and around Newton-le-Willows. We will also work with local communities to develop strategies for Haydock and Rainhill centres.

Protecting and enhancing our natural environment

We will seek to improve the quality of open spaces and connect and expand the existing greenway network of footpaths, cycle and bridleways, between open spaces. We will ensure developers plant new trees, woodlands and hedgerows in and around new developments.

Providing an efficient infrastructure & transport network

We recognise people's concerns about infrastructure and traffic. We are committed to investing in our communities - development and investment in infrastructure go hand in hand - one does not happen without the other. Areas that see growth and development will see wider community benefits such as improved roads, highways and schools etc.

HOW CAN I FIND OUT MORE?

The Submission Draft of the Local Plan, relevant supporting documents and FAQs are available on the Council's website: www.sthelens.gov.uk/localplan

Paper copies are also available for viewing at St Helens Town Hall Ground Floor Reception and at all St Helens Council libraries. Alternatively, you can come along to one of our drop in sessions overleaf.

WHAT HAPPENS NEXT?

Your comments will be gathered, logged and submitted to an independent Government Inspector, together with the plan, for their examination. The Inspector will consider all the issues on the basis of written documents provided to them and will also hold public hearings to decide if the plan meets requirements set out by the Government. They will determine who will be invited to the public hearings, which are likely to be held in late summer 2019.

Following this the Inspector will issue a report setting out their conclusions.

We expect to adopt the Local Plan in 2020.



St. Helens Council

Place Services

Development Plans

Town Hall

Victoria Square

St Helens

WA10 1HP

Tel: 01744 676190

Minicom: 01744 671671

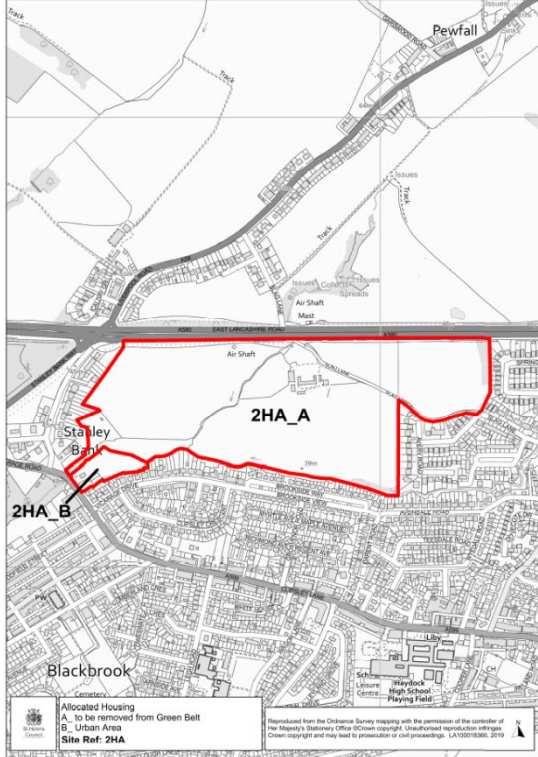
Email: planningpolicy@sthelens.gov.uk

→ www.sthelens.gov.uk/localplan

Please contact us to request translation of Council information into Braille, audio tape or a foreign language.

10001214

APPENDIX 16: SITE NOTICES DISPLAYED NEAR TO PROPOSED ALLOCATED AND SAFEGUARDED EMPLOYMENT AND HOUSING SITES WITHIN THE LPSD 2020-2035



Allocated Housing
A. to be removed from Green Belt
B. Urban Area
Site Ref: 2HA

St. Helens Council

St. Helens Borough Local Plan: Have Your Say

The St. Helens Local Plan 2020 – 2035 Submission Draft has been published by the Council to enable people to make comments ("Representations") on the Plan. A nearby site has been identified for allocation or safeguarding for housing or employment use in the Local Plan.

The accompanying site plan provides information on whether the site has been identified for allocation or safeguarding for housing or employment use. The site plan contains a site reference number which should be used to find the site in the Local Plan document and in any future correspondence with the Council about the site.

Should you wish to find out more about the Local Plan proposals for the site, copies of the Local Plan and official comment ("representation") forms are available online at: www.sthelens.gov.uk/localplan, at the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries (please check local branch for opening times or visit www.sthelens.gov.uk/libraries).

The Council is hosting a series of drop-in events across the Borough and welcomes anyone who wishes to find out more about the Local Plan to attend. Information about the drop-in events and the Local Plan is available online at: www.sthelens.gov.uk/localplan or by email to: planningpolicy@sthelens.gov.uk or telephone: 01744 676 190.

You can comment via an online form at: www.sthelens.gov.uk/localplan, or send to planningpolicy@sthelens.gov.uk, or by post to: Local Plan, St. Helens Council, Town Hall, Victoria Square, St. Helens, WA10 1HP.

Any comments on the Local Plan should be received by no later than 5pm on Wednesday 13th March 2019.

The Council is giving notice in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

APPENDIX 17: ARTICLES AND ADVERTS IN THE LOCAL NEWSPAPERS AT LPSD

These articles and adverts were published in the St. Helens Star on various dates throughout the publication 'consultation', including 17 & 29 January 2019 and 21 February 2019.

ADVERTISEMENT FEATURE



St Helens Borough Local Plan 2020 - 2035

We have prepared the next stage of our new Local Plan, which sets out our ambitions to build a vibrant and prosperous borough over the next 15 years. This is your final chance to make comments on the plan before it is examined by a Government Inspector.

Why do we need a Local Plan?

In St Helens we need a new Local Plan to show the development needs in our communities, in order to give residents and the community some certainty about our development strategy and future use of land in the borough. It shows where development is planned, and therefore where resources and possible additional infrastructure such as roads, or new schools, are needed to support it. The plan will seek to prevent decisions being made on developments which may not be in the best interests of our local community. Most importantly it will set out our ambitions to create jobs, opportunities for our young people, homes for people to live in, enhance our greenspace network and develop our town and district centres.

What has happened so far?

Every local authority has to have an adopted plan, which they must review and update to ensure it meets the development needs of the communities it covers. A review of our employment and housing needs in 2015 identified a deficit in both, and this triggered the need to prepare a new Local Plan.

In late 2016 and early 2017 we held a public consultation on the Preferred Options of the plan, from which we received nearly 6,000 responses.

We have reviewed and considered all the responses we received. We have listened to what you have told us you want to see and have reviewed our approach against the changing requirements of Government policy. We have listened to those residents who had legitimate concerns, but we have also listened to those in our communities that want jobs, new homes and investment.

From this we have now developed the next stage of the plan, known as the Submission Draft, which we feel allows for balanced growth, bringing previously developed land back into use, whilst also protecting and enhancing the natural environment.

What happens next?

The Local Plan Submission Draft is the version that the council intends to adopt at the end of the process, if approved by Government. The Submission Draft is now available for you to view and make comments on.

The council's role at this stage is to publicise the plan and to gather your views and comments. As a council we will gather these comments and submit them to an independent Government Inspector, together with the plan, for examination. Your comments will not be used to further develop or alter the plan by the council at this stage, but will be considered by the Government Inspector.

The Submission Draft of the Local Plan must be published for public viewing and comments for a period of at least six weeks, but we have extended the time to eight weeks, to ensure that anyone who wants to comment has an opportunity.

The Local Plan Submission Draft is available to view and make comments on from Thursday 17th January to 5pm on Wednesday 13th March 2019.

The Government Inspector will consider all the issues on the basis of written documents provided to them and will also hold public hearings to decide if the plan meets requirements set out by the Government. They will determine who will be invited to the public hearings, which are likely to be held in late summer 2019. Following this the Government Inspector will issue a report setting out their conclusions.

If approved, the council expects to adopt the Local Plan in 2020.

How can I find out more?

The Submission Draft of the Local Plan, relevant supporting documents and frequently asked questions (FAQs) are available on the council's website: www.sthelens.gov.uk/localplan

Paper copies are also available for viewing at St Helens Town Hall, Ground Floor Reception and at all St Helens Council libraries. Alternatively, you can come along to one of our drop in sessions below.

You can make comments (officially called representations) on the Submission Draft of the Local Plan. All comments must be received by the council's Planning Policy Team by 5pm on **Wednesday 13th March 2019**.

There are a number of ways in which you can provide your comments to us:

Online at: www.sthelens.gov.uk/localplan and complete a comments form, or download a form and email or post it to us.

Email your completed comments form to:

localplan@sthelens.gov.uk

Post completed comments forms to: **St Helens Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens WA10 1HP**, or

Visit one of our drop in sessions below, to find out more and pick up a comments form.

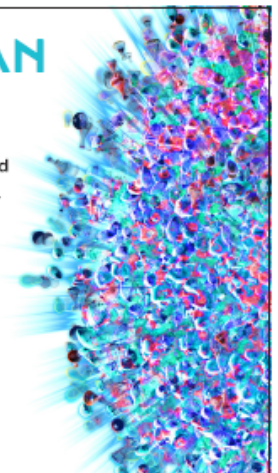
HAVE YOUR SAY ON ST HELENS LOCAL PLAN LOCAL PLAN DROP IN SESSIONS

We are holding a number of local drop in sessions in neighbourhoods across St Helens. These sessions are open to all and will give you an opportunity to view the Submission Draft of the Local Plan, ask questions and pick up a comments form.

Drop in sessions are available at:

St Helens Town Hall, St Helens Town Centre
St Ann's Millennium Centre, Rainhill
St John Vianney School, Thatto Heath
Newton-le-Willows Library, Newton-le-Willows
St Julie's Church Hall, Eccleston
Billinge Road Community Hall, Garswood
Haydock Library, Haydock
Chester Lane Library, Sutton
Rainford Village Hall, Rainford

Tuesday 22nd January	12pm - 5pm
Tuesday 29th January	2pm - 6.30pm
Tuesday 12th February	2pm - 6.30pm
Thursday 14th February	2pm - 6.30pm
Monday 18th February	2pm - 6.30pm
Wednesday 20th February	2pm - 6.30pm
Monday 25th February	2pm - 6.30pm
Tuesday 26th February	2pm - 6.30pm
Thursday 28th February	2pm - 6.30pm





A balanced plan for a better future

We have listened to what you have told us, and have prepared the next stage of our new Local Plan, that looks at our existing needs together with our future development plans, and strikes a balance between growth, aspirations and quality of life for our communities.

We must deliver a Local Plan that accounts for the current and future growth in housing and employment needs in St Helens. We will be sensitive and balanced in how we deliver that plan. We want a plan for St Helens that will look to bring forward brownfield land and bring it back into use. We want a plan that will ensure that critical infrastructure such as schools, doctors surgeries and highways are not put at risk because of new development. But we also want a plan that will protect and enhance our natural environment and St Helens' many beautiful parks and open spaces.

We've developed a balanced plan for a better St Helens, with five key priorities that guided our approach:

Regenerating and growing St Helens

This plan aims to establish St Helens as a modern, economically diverse borough with good business and employment opportunities. We are making excellent progress in bringing in investments and jobs - indeed 4,000 new jobs were created in St Helens in 2016-17; that's 44% of all new jobs growth in the Liverpool City Region delivered in a borough with just 11% of the population. Our key priorities include strengthening the local economy, promoting business growth, investment in infrastructure, increasing employment and reducing the number of people out of work.

This plan aims to meet the identified housing need, and the potential extra housing need, resulting from this economic growth. When applying the Government's standard method for calculating housing need, the minimum annual housing need figure for St Helens is 468 new homes per year over the life of the plan. However, this figure makes no allowance for the increased housing need that is likely to result from an increase in employment growth and in order to account for this growth a minimum annual housing need figure of 486 new homes per year has been determined. This equates to a total of 7,290 homes over the life of the plan - substantially less than the figure of 570 homes per year in the previous version - the Preferred Options - of the plan.

Through this plan we will make affordable homes available. We have set a target of 30% for affordable homes on most greenfield sites across St Helens.

Continuing commitment to brownfield first

In order to meet our requirements for employment opportunities and new homes, some release of Green Belt will be needed, although this is now much lower than originally suggested at the Preferred Options stage. We have been working hard to identify and bring back in to use suitable brownfield sites. Our proactive work on brownfield sites now means that 59% of the borough will remain in the Green Belt - a higher proportion than any other area in Merseyside - and is therefore protected from most forms of new development.

Revitalising and strengthening our town and district centres

Our borough has two town centres. For St Helens Town Centre, we are continuing to build on our vision for a sustainable, modern, vibrant and attractive town. Although the fortunes of town centres and high streets have recently been in decline nationally we have seen a number of new businesses and investors spring up in the town in recent months - showing their confidence in what the town can become.

Earlestown (Newton-le-Willows) serves as our borough's second town centre, building on its strength as a market town. We are already working on three visioning exercises for Earlestown, Rainhill and Haydock which we will be consulting on with local communities in the spring. The Local Plan reinforces our ambitions and commitment to deliver on this strategy.

Protecting and enhancing our natural environment

Whilst looking to create jobs and homes, we will strive to provide a balanced plan - ensuring that the quality of the natural environment is protected and enhanced. We will seek to improve the quality of open spaces and connect and expand the existing greenway network of footpaths, cycle and bridleways, between open spaces. We will ensure developers plant new trees, woodlands and hedgerows in and around new developments.

Providing an effective infrastructure and transport network

We recognise people's concerns about infrastructure. We also recognise that in order for us to build sustainable communities, the provision of high quality infrastructure to support existing and future development is essential. Increased development and investment in infrastructure will go hand in hand - one will not happen without the other.

Areas that see growth and development will see wider community benefits such as improved roads, highways and schools where needed. The plan also supports key transport infrastructure such as investments to junction 23 of the M6. It supports improvements to rail capacity, stations, bus facilities and walking and cycling networks. It prioritises transport linkages between homes and places of work, to ensure new jobs are as accessible as possible to local people.

CURRENT AND FUTURE GROWTH IN ST HELENS



7290
NEW HOMES
BY 2035
(1260 LESS THAN IN
PREFERRED OPTIONS)



7000
POTENTIAL NEW
JOB'S OVER THE NEXT
15 YEARS



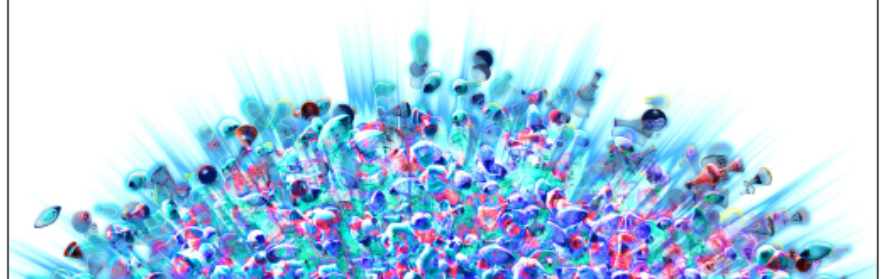
30%
TARGET FOR
NEW HOMES TO
BE AFFORDABLE
(ON GREENFIELD SITES)



59%
OF ST HELENS REMAINS
IN GREEN BELT
(PROTECTED FROM MOST DEVELOPMENT)



44%
OF ALL NEW JOBS IN THE LCR
WERE IN ST HELENS IN 2016/17
(WITH ONLY 11% OF THE LCR POPULATION)



**APPENDIX 18: INDEX OF REPRESENTOR NAMES,
REFERENCE NUMBERS AND REPRESENTATION
NUMBER(S) AT LPSD STAGE**

APPENDIX 18

INDEX OF REPRESENTOR NAMES, REFERENCE NUMBERS AND REPRESENTATION NUMBER(S)

Representor Number	Representation Number (Plan Order)	Full Name	Organisation	Agent
RO0001	PO1775	Mrs K Abbott		
RO0002	PO1776	Mr D Abbott		
RO0003	PO1996	Mr A Abbott		
RO0004	PO1997	Ms E Abbott		
RO0005	PO0173	Miss L Adair		
RO0006		Mr P Adams		
RO0007	PO2224, PO3141	Mrs K Adamson		
RO0008		Mr G Adcock		
RO0009		Mrs P Adcock		
RO0010		Mr J Addison		
RO0011		Ms N Addison		
RO0012	PO0638, PO0778, PO0938, PO1151, PO1351, PO1966, PO2507, PO2956 PO3321	Mrs M Ainscough		
RO0013	PO0639, PO0779 PO0939, PO1152 PO1352, PO1967 PO2508, PO2957 PO3322	Mr G Ainscough		
RO0014	PO0664, PO0804 PO0964, PO1180 PO1377, PO2009 PO2533, PO2982 PO3347	Mr C Ainscough		
RO0015	PO0709, PO1439	Mrs L Ainsworth		
RO0016	PO2155	Mrs P Ainsworth		
RO0017	PO0655, PO0795, PO0955, PO1168, PO1368, , PO1985, PO2524, PO2973, PO3338	Mr S Aldridge		
RO0018	PO3078	Mrs L Allan		
RO0019		Mrs S Allanson		
RO0020		Mr T Allanson		
RO0021	PO2737	Mr K Allcock		
RO0022	PO2738	Mrs R Allcock		
RO0023	PO1062, PO1690	Mrs A Allcock		
RO0024	PO0096, PO0097, PO0098, PO0099, PO1934	Mrs S Allen		
RO0025	PO0141, PO0142, PO0143	Mr W Allen		
RO0026		Mr D Allen		
RO0027		Mrs A Allen		
RO0028	PO3068	Mr & Mrs P Allen		
RO0029		Mrs S Allerton		
RO0030		Mr N Allerton		
RO0031		Mr K Allerton		
RO0032		Mrs P Allerton		
RO0033		Miss G Allman		
RO0034	PO0815, PO0970, PO1205, PO3370, PO3598, PO3652	Mr D Almond		
RO0035	PO2730	Mrs E Anders		
RO0036		Miss C Anders		
RO0037	PO1094, PO1770	Mrs J Anders		
RO0038	PO1095	Mr T Anders		
RO0039	PO0274, PO0992, PO1442. PO2603, PO3402, PO3894	Ms J Anderson	Clerk to Eccleston Parish Council	
RO0040	PO2952	Miss B Anderton		

RO0041	PO3193	Mrs J Andrew		
RO0042		M Ang		
RO0043		Mr F Ang		
RO0044	PO0134	Mr G Appleton		
RO0045	PO0135	Mr P Appleton		
RO0046	PO0136	Mrs V Appleton		
RO0047		Mrs L Appleton		
RO0048		Mr R Appleton		
RO0049		Mr P Appleton		
RO0050		Mrs S Appleton		
RO0051		Mr A Appleton		
RO0052	PO3835, PO3843, PO3844, PO3847, PO4041, PO4042, PO4043, PO4044, PO4045, PO4046, PO4047	Mr P Appleton		
RO0053	PO3237	Mrs J Appleton		
RO0054	PO2290	Mr K Appleton-Derrick		
RO0055		Mr K Ardon		
RO0056	PO2923	Mrs L Armstrong		
RO0057		Mr G Arnold		
RO0058	PO1925, PO2899	Mr W Ashcroft		
RO0059	PO2056	Mrs S Ashton		
RO0060	PO2145	Mr D Ashton		
RO0061	PO0030, PO0299, PO0717, PO1502, PO4013	Ms J Ashton		
RO0062		Mr J Aspinall		
RO0063	PO0042, PO1519	Ms P Astbury		
RO0064	PO0005, PO0973, PO3600	Mr P Astles	Our Local Voice	
RO0065	PO3883	Mr & Mrs WK & M Atherton		
RO0066	PO0649, PO0789, PO0949, PO1162, PO1362, PO1979, PO2518, PO2967, PO3332	Mr R Atherton		
RO0067	PO0825, PO2144	Mrs L Atherton		
RO0068		Mrs K Attwood		
RO0069	PO0068	Mr T Austin		
RO0070	PO0069	Mrs M Austin		
RO0071		Mrs W Austridge		
RO0072		Mr B Austridge		
RO0073	PO1107, PO1835, PO1836, PO2832	Mr H Avison		
RO0074	PO1108, PO1839	Mrs P Avison		
RO0075		Mrs D Bacon		
RO0076	PO1111, PO1855	Mr K Bailey		
RO0077	PO2102, PO3283	Mr C Bailey		
RO0078	PO1219, PO2179	Mrs J Bailey		
RO0079	PO0500, PO2199, PO2200, PO3120	Miss E Bailey		
RO0080	PO0503, PO2235, PO3126, PO3866	Mr N Bailey		
RO0081	PO2341, PO3152	Mrs J Bailey		
RO0082	PO2645, PO3754	Cllr D Baines	Windle Ward Councillor	
RO0083		Mrs M Baker		
RO0084		Mr K Baker		
RO0085	PO2222	Mrs J Baker		
RO0086	PO1758	Mrs L Ball		
RO0087	PO0475, PO0476, PO2053, PO3023	Mr J Ball		
RO0088		Mr G Ball		
RO0089	PO1865, PO2857	Mr J Balmer		
RO0090	PO3232	Mrs L Balmer		

RO0091		Mr A Bamber		
RO0092		Mr B Bamber		
RO0093		Mr S Bamber		
RO0094		Mrs L Bamber		
RO0095		Mr G Bampton		
RO0096	PO1868, PO2866	Miss M Banda		
RO0097	PO0002, PO0253, PO1401	Ms J Banks		
RO0098	PO0621, PO2377, PO2460, PO3294, PO3562, PO3791, PO3792	Mr & Mrs G Banks		
RO0099	PO0017, PO0989, PO1430, PO2596, PO3893	Ms E Barker		
RO0100	PO0705, PO1431, PO2597	Mr C Barker		
RO0101		Miss L Barker		
RO0102		Mr R Barker		
RO0103		Mrs J Barker		
RO0104		Mrs E Barker		
RO0105	PO3087	Mr S Barker		
RO0106		Miss K Barlow		
RO0107	PO1428, PO2595	Mr A Baron		
RO0108	PO1613	Mrs S Barr		
RO0109	PO2187	Mr J Barrow		
RO0110	PO0546, PO0675, PO0848, PO0868, PO1279, PO1319, PO2291, PO3385, PO3430, PO3453, PO3854	Mrs A Barrow		
RO0111	PO3192	Mrs R Barrow		
RO0112	PO0221, PO2316	Mr D Barrow		
RO0113	PO2035, PO3000	Mr J Barston		
RO0114	PO3062	Mrs J Bartley		
RO0115	PO0241, PO0265, PO2571	Mr C Barton		
RO0116	PO0292, PO1492, PO4006	Mrs & Mrs Barton		
RO0117	PO0044, PO0320, PO0756, PO1038, PO1584, PO2480, PO2671, PO3817, PO3906, PO4034	Ms S Barton	ECRA	
RO0118	PO2541	Mr G Barton		
RO0119	PO0593, PO1269, PO2368, PO3233, PO3952	Mrs S Barton		
RO0120	PO1141, PO1935	Dr J Barton		
RO0121	PO1142, PO1936	Mr J Barton		
RO0122	PO1143, PO1937	Mr D Barton		
RO0123	PO0108	Mr T Barton		
RO0124	PO2011	Mrs B Barton		
RO0125	PO0769, PO1833, PO2830, PO3921	Mrs A Bate	Windle Parish Council Chair	
RO0126	PO2950	Mrs E Bate		
RO0127		Mrs R Bate		
RO0128		Mr E Bate		
RO0129	PO1139, PO1927	Mrs K Batie		
RO0130	PO1005	Mrs K Bebbington		
RO0131	PO4037	Mr D Beck		
RO0132	PO2125	Ms R Bedson		
RO0133		Mrs K Beesley		
RO0134	PO2766	Mr J Begg		
RO0135	PO1666	Mrs M Begg		
RO0136	PO0321, PO1042, PO1043, PO1595, PO2679, PO3501, PO3741, PO3752	Mr M Bell	Planning Policy & Programmes Manager, Warrington Council	
RO0137	PO1873, PO2870	Mr I Bell		

RO0138	PO0997, PO2614, PO2615, PO3896	Cllr Bell, Dyer, Gomez-Aspron	Ward Councillors, St. Helens Council	
RO0139	PO1621, PO2732	Ms L Bennett		
RO0140	PO1622, PO2733	Miss L Bennett		
RO0141	PO2773	Mrs K Bennett		
RO0142	PO0420, PO1136, PO1905, PO2886	Mrs A Bennett		
RO0143	PO0170	Mrs L Bennett		
RO0144	PO0139	Mrs L Bentham		
RO0145	PO1762	Mrs B Bentham		
RO0146	PO0731, PO1311, PO2384, PO2435, PO2465, PO2466, PO2636, PO3305, PO3407, PO3408, PO3848	Mrs M Benyon		
RO0147	PO1767	Mr M Benyon		
RO0148		Mr P Beran		
RO0149	PO1533, PO2486, PO3797	Mr & Mrs Berry		Mr D Strode, PWA Planning
RO0150	PO3472, PO3519, PO3646	Mr T Bettany-Simmons		
RO0151	PO1218	Mr P Bevan		
RO0152	PO0137	Mr P Bickerton		
RO0153	PO2085	Mrs D Bickerton		
RO0154	PO1603, PO2690, PO3909	Miss A Billington		
RO0155	PO0552, PO1252, PO2303, PO2304	Ms M Billington		
RO0156	PO1611, PO2728	Mrs E Billington-Smith		
RO0157	PO1301, PO1394, PO2609, PO3387, PO3497, PO3978	Ms M Bintley		
RO0158		Miss C Birch		
RO0159	PO0615, PO0618, PO0754, PO0874, PO0878, PO0931, PO1037, PO1578, PO2401, PO2438, PO2481, PO2501, PO2665, PO3366, PO3392, PO3525, PO3576, PO3587, PO3635, PO3669, PO3694, PO3701, PO3712, PO3737, PO3816, PO4031	I&D Birchall		Mr G Lamb, Pegasus Group
RO0160	PO1090, PO1748	Mrs S Birchall		
RO0161	PO0408, PO1879, PO2878	Mrs C Birchall		
RO0162	PO2132	Mrs T Bird		
RO0163		Mrs D Birney		
RO0164	PO2012	Mr S Black		
RO0165	PO2013	Miss S Black		
RO0166	PO0110	Mrs S Black		
RO0167		Mrs J Black		
RO0168	PO2611	Mr & Mrs A Blackford		
RO0169	PO2913, PO3829	Mrs E Blackburn		
RO0170	PO1943	Mr R Blackburn		
RO0171		Mrs L Blackburn		
RO0172	PO0189, PO0524, PO2248	Mrs C Blade		
RO0173	PO0190, PO0525, PO2249	Mr S Blade		
RO0174	PO2582	Mr P Bleasdale		
RO0175	PO3782	Mr & Mrs J Bluck		
RO0176	PO3877	Mr M Bluck		
RO0177	PO3874	Miss L Bluck		
RO0178		Mr P Blundell		
RO0179	PO2018	Mr I Boardman		
RO0180	PO3602, PO3603, PO3718	A Bohan	Natural England	
RO0181		Mr K Bolan		
RO0182		Mr L Bolan		
RO0183		Mrs S Bolan		

RO0184	PO1573, PO2662	Ms C Bolton	Seneley Green Parish Council Clerk	
RO0185	PO2088	Mrs A Bones		
RO0186	PO2087	Mr J Bones		
RO0187	PO1146, PO1960	Mrs C Booth		
RO0188	PO1147, PO1961	Mr R Booth		
RO0189	PO2064, PO3029	Mrs K Booth		
RO0190	PO3505	Mrs M Boulton		
RO0191	PO1789	Mr A Bourke		
RO0192	PO0375, PO1696	Mrs B Bowden		
RO0193	PO0376, PO1697	Mr G Bowden		
RO0194	PO1171, PO1990	Mrs K Bowen		
RO0195	PO2228, PO3142	Mr T Bowers		
RO0196	PO2237, PO3150	Mr A Bowers		
RO0197	PO2238, PO3151	Mrs H Bowers		
RO0198	PO0183	Mr P Boyce		
RO0199		Mrs K Boyes		
RO0200	PO1895, PO2863	Mr F Boyle		
RO0201	PO3177	Mr P Brabin		
RO0202	PO3089	Mrs T Bradshaw		
RO0203		Mrs C Breaker		
RO0204		Mrs T Brennan		
RO0205	PO2574	Ms A Brennand		
RO0206		Mrs A Bridge		
RO0207	PO0249, PO0817	Mr K Bridge		
RO0208	PO0382, PO0383, PO1069, PO1703	Mr D Briers		
RO0209	PO0666, PO0810, PO1198, PO2033, PO2998, PO3420	Mr S Brine	ECRA	
RO0210		Mr L Briscoe		
RO0211		Mr D Briscoe		
RO0212		Mrs S Briscoe		
RO0213		Mr S Briscoe		
RO0214	PO0442, PO1988	Mrs A Broadbent		
RO0215	PO1921, PO2896	Miss E Broadbent		
RO0216	PO0443, PO1992	Mr F Broadbent		
RO0217	PO2591	Mrs E Brocklehurst		
RO0218	PO3214	Mr N Brocklehurst		
RO0219	PO1153, PO1750	Mr L Brooks		
RO0220		Mr J Brooks		
RO0221		Mrs K Brooks		
RO0222		Mrs S Brooks-Birkett		
RO0223		Mr T Brooks-Birkett		
RO0224	PO3075	Mrs P Broughton		
RO0225	PO0694, PO0899, PO2374, PO2404, PO3258, PO3259, PO3521	Mr A Brown		Mr S Taylor, SATPLAN Ltd.
RO0226	PO2623	Mrs J Brown		
RO0227	PO1480	Ms J Brown		
RO0228	PO2930	Mr I Brown		
RO0229	PO2163	Miss J Brown		
RO0230	PO1771	Mrs M Brown		
RO0231		Mrs H Brownbill		
RO0232		Mr J Brownbill		
RO0233	PO0394, PO1779	Mr D Bruce		
RO0234	PO0395, PO1780	Mrs D Bruce		
RO0235	PO0640, PO0780, PO0940, PO1153, PO1353, PO1968, PO2509, PO2958, PO3323	Mr C Byrne		
RO0236	PO0577, PO0578, PO0579, PO0580, PO1264, PO2354, PO2355, PO3224	Mrs J Buckle		

RO0237	PO0581, PO0582, PO0583, PO0584, PO1265, PO2356, PO2357, PO3225	Mr M Buckle		
RO0238	PO2135	Mr C Bungay		
RO0239	PO3108	Mr A Burdett		
RO0240	PO1096, PO1787	Mrs P Burgess		
RO0241	PO1097, PO1788	Mr F Burgess		
RO0242		Mr B Burgess		
RO0243	PO0266, PO0397, PO1411, PO1781, PO1782, PO3984	Mr & Mrs N Burke		
RO0244	PO2542	Mr K Burke		
RO0245	PO1305, PO2666, PO3500	Mr A Burnham	Mayor of Manchester, Greater Manchester Combined Authority	
RO0246		Mrs C Burns		
RO0247		Mr M Burns		
RO0248		Mrs V Burns		
RO0249	PO0039, PO1020, PO3308	Mr A Burrows		
RO0250	PO2691	Mrs C Burrows		
RO0251		Mr M Burrows		
RO0252		Mrs M Burrows		
RO0253	PO1462, PO3997	Mr I Burslem		
RO0254		Miss L Byrne		
RO0255		Mr M Byrne		
RO0256		Mr J Byrne		
RO0257		Mrs K Byrne		
RO0258	PO0679, PO0852, PO2342, PO3213, PO3683	Ms S Byrne		
RO0259	PO3073	A Byron		
RO0260	PO2616	Mr D Cable		
RO0261	PO3156	Mr A Caddick		
RO0262	PO1211, PO2153	Mrs C Cain		
RO0263	PO1212, PO2166	Mr D Cain		
RO0264	PO0295, PO1496, PO4009	Mr J Calderbank		
RO0265	PO2156	Mrs N Calderbank		
RO0266		Mr M Caldwell		
RO0267		Mrs S Caldwell		
RO0268		Mrs D Calland		
RO0269		Mr D Callaway		
RO0270		Mrs C Callaway		
RO0271	PO2344	Mrs W Callery		
RO0272	PO3297	Mr M Calvert		
RO0273	PO2230, PO3145	Mr P Campbell		
RO0274	PO2231, PO3146	Mrs N Campbell		
RO0275	PO1786	Mr M Campsey		
RO0276		J Canning		
RO0277		Mr N Canning		
RO0278	PO2147	Miss J Capper	Cheshire Mouldings	
RO0279	PO2919	Mr A Carberry		
RO0280	PO2920	Mr A Carberry		
RO0281	PO0645, PO0785, PO0945, PO1158, PO1358, PO1973, PO2514, PO2963, PO3328	Mrs L Carey		
RO0282	PO0653, PO0793, PO0953, PO1166, PO1366, PO1983, PO2522, PO2971, PO3336	Mr S Carey		
RO0283	PO3270, PO3837	Mr M Carr		
RO0284	PO2165, PO3933	Mrs A Carroll		
RO0285	PO1593	Ms J Carter		
RO0286	PO1594	Mr D Carter		
RO0287	PO0114	Mr D Carter		

RO0288	PO0116	Mr I Carter		
RO0289	PO0118	Mrs P Carter		
RO0290	PO1596, PO2311	Mr J Case		
RO0291		Ms C Case		
RO0292	PO0430, PO1945	Mrs T Cash		
RO0293	PO1592	Mr R Cass	Chairman, The Cass Foundation	
RO0294		Mrs A Cassell		
RO0295	PO2126	Mr G Cassell		
RO0296		Mr M Cassell		
RO0297		Mrs I Cassidy		
RO0298	PO0244, PO3178	Miss C Cassidy		
RO0299	PO2062	Mrs J Casson		
RO0300	PO2556	Ms J A Cave		
RO0301	PO0023, PO0996, PO1459, PO2612, PO2613	Mr M Cawood	Head of Planning Services, Knowsley Council	
RO0302		Miss Z Chadwick		
RO0303		Mrs A Chadwick-Tattersall		
RO0304		Mr J Chamberlain		
RO0305		Mrs C Chamberlain		
RO0306	PO0026, PO1002, PO1472, PO2621, PO3897	Ms L Chana		
RO0307	PO3079	Mr D Chana		
RO0308	PO3080	Ms C Chana		
RO0309	PO0013, PO1813	Mrs S Charles		
RO0310		Mrs S Charman		
RO0311	PO2090, PO3785, PO3966	Mr B Cheshire		
RO0312	PO1680	Mrs R Chesworth		
RO0313	PO2985	Mrs M Chorley		
RO0314	PO2986	Mr C Chorley		
RO0315	PO2987	Mr B Chorley		
RO0316	PO1673, PO2772	Mrs I Cieplak		
RO0317	PO1732, PO2776	Mr G Cieplak		
RO0318	PO2226	Mr J Cieslar		
RO0319	PO2227	Mr J Cieslar		
RO0320	PO0412, PO0423, PO1125, PO1886, PO2897	Mr L Clancy		
RO0321	PO3165	Mrs T Clancy		
RO0322	PO0231, PO0575, PO2352, PO3222	Mr W Clarey		
RO0323	PO0232, PO0576, PO2353, PO3223	Mrs H Clarey		
RO0324	PO1794	Mrs J Clark		
RO0325		Mr S Clark		
RO0326	PO1432, PO3364, PO3401, PO3503	Ms D Clarke	Network Rail	
RO0327	PO0971, PO1214, PO3424	Mr T Clarke	Theatres Trust	
RO0328	PO2537, PO3867	Mr N Cliffe		
RO0329	PO0373, PO0374, PO1065, PO1693, PO1694, PO2778	Mrs D Clisham		
RO0330	PO0090	Mr C Cloran		
RO0331	PO0416, PO0417, PO1131, PO1900	Mrs P Clough		
RO0332	PO3206	Miss K Coburn		
RO0333	PO2413	J Cockayne		
RO0334	PO1800, PO2809	Mr A Cocker		
RO0335	PO1801	Mrs V Cocker		
RO0336	PO1468, PO4000	Ms L Collins		
RO0337	PO1872, PO2869	Mr S Collins		
RO0338	PO0405, PO1877, PO2872	Mrs J Collins		

RO0339	PO0433, PO0434, PO1955, PO2924	Mr J Collins		
RO0340	PO2041, PO3006	Mrs M Collins		
RO0341	PO2042, PO3007	Mr R Collins		
RO0342	PO2043, PO3008	Mr D Collins		
RO0343	PO0187	Mrs D Collins		
RO0344	PO0188	Mr P Collins		
RO0345	PO3262	Mr M Collins		
RO0346	PO0032, PO3902	Mrs H Conley		
RO0347	PO0033, PO3903	Mr N Conley		
RO0348		Mrs B Connelly		
RO0349	PO2706	Mrs P Connor		
RO0350	PO0066	Ms K Conroy		
RO0351	PO2824	Mr C Conroy		
RO0352	PO2825	Mrs M Conroy		
RO0353		Mrs F Conway		
RO0354		Mr E Conway		
RO0355	PO2894	Mrs S Cook		
RO0356	PO0196, PO0533, PO1236, PO2259, PO2260	Miss C Cook		
RO0357	PO2800	Mr W Cookson		
RO0358	PO2801	Mrs F Cookson		
RO0359		Mr P Cooney		
RO0360	PO0149, PO0814	Mrs D Cooney		
RO0361	PO0182	Mr C Cooney		
RO0362	PO1427	Mrs N Cooper		
RO0363	PO0112, PO1189, PO2020, PO3778	Mrs K Cooper		
RO0364	PO0113, PO1190, PO2021, PO3779	Mr P Cooper		
RO0365	PO2297, PO3179	Mrs A Cooper		
RO0366	PO0594, PO0623, PO0624, PO0682, PO0691, PO0692, PO0855, PO0913, PO0979, PO1292, PO1293, PO1306, PO1307, PO1336, PO1396, PO1419, PO1420, PO2456, PO2457, PO2458, PO2491, PO2583, PO3243, PO3303	Ms J Copley	Campaign to Protect Rural England	
RO0367	PO1054, PO1740	Mr P Corcoran		
RO0368	PO1820	Mrs S Corfe		
RO0369		Mr G Corfield		
RO0370		Mrs D Corfield		
RO0371		Mrs Z Corner		
RO0372	PO0046, PO1586, PO2673	Mr M Corrigan		
RO0373	PO0047, PO1587, PO2674	Ms J Corrigan		
RO0374		Mrs P Cotter		
RO0375	PO0019, PO0598, PO0612, PO0683, PO0711, PO0911, PO0916, PO1314, PO1338, PO1444, PO2492, PO2607, PO3403, PO3459, PO3545, PO3586, PO3613, PO3622, PO3745	Mr A Cotton		Mr D Ingram, Barton Wilmore
RO0376	PO1837, PO2833	Mr D Cowen		
RO0377	PO1838, PO2834	Mrs C Cowen		
RO0378	PO0006, PO1409, PO2565	Mrs P Cowley		
RO0379	PO0007, PO0177, PO1410, PO2213, PO2566	Mr A Cowley		
RO0380		Mr K Coyle		
RO0381		Mrs Z Coyle		
RO0382	PO3035	Mr I Craig		

RO0383	PO2099, PO3280	Mr R Craven		
RO0384	PO0086	Mrs A Crawford		
RO0385	PO0115	Mrs R Crawford		
RO0386	PO0117	Mr D Crawford		
RO0387	PO0377, PO1067	Mrs S Crehan		
RO0388	PO1068	Mr M Crehan		
RO0389		Miss A Crellin		
RO0390		Mr P Crellin		
RO0391		Mrs M Crellin		
RO0392		Miss R Crellin		
RO0393		Miss E Crellin		
RO0394		Mr P Crellin		
RO0395	PO0325, PO1606, PO4036	Mrs E Crook		
RO0396		Miss C Cropper		
RO0397	PO0759, PO1601, PO2685, PO3908	Mrs M Crosby		
RO0398	PO0211, PO2280	Mrs A Cryan		
RO0399	PO1821	Ms G Culshaw		
RO0400	PO0484, PO3034	Mrs M Cummings		
RO0401	PO2070	Mr P Cummings		
RO0402	PO1036, PO1576, PO1727	Miss AM Cunliffe		
RO0403	PO1610, PO2727	Mrs P Cunliffe		
RO0404	PO1625	Mrs M Cunliffe		
RO0405	PO2739	Mr D Cunliffe		
RO0406	PO1061, PO1729	Mr G Cunliffe		
RO0407	PO1088, PO1728	Mrs M Cunliffe		
RO0408	PO1954, PO2922	Mrs A Cunningham		
RO0409	PO0531, PO3160	Mr J Cunningham		
RO0410	PO0201, PO0538, PO1241, PO2269, PO3938	Mr Z Cunningham		
RO0411	PO0202, PO0539, PO1242, PO2270, PO3939	Mr E Cunningham		
RO0412	PO0204, PO0541, PO1244, PO2272, PO3941	Ms C Cunningham		
RO0413	PO2177	Mr P Curran		
RO0414		K Curry		
RO0415	PO2024, PO2991	Mr J Cushion		
RO0416	PO0317, PO1571, PO4030	Ms E Cutler		
RO0417	PO1783	Mr T Cutler		
RO0418	PO1790	Mrs J Cutler		
RO0419	PO2345	Ms C Cvek		
RO0420	PO2424	Mrs J Dagnall		
RO0421	PO1864, PO2856	Miss K Dagnall		
RO0422		Mrs J Dalton		
RO0423		Mr L Dalton		
RO0424	PO1216, PO2164, PO3101, PO3102, PO3932	Mrs M Daly		
RO0425	PO0492, PO2178, PO3285, PO3301, PO3362, PO3371, PO3599, PO3953	Mr M Daly		
RO0426	PO2183, PO3115	Mrs M Daly		
RO0427	PO2184, PO3116	Mr G Daly		
RO0428	PO1075, PO1714	Mrs S Daniel		
RO0429	PO1076, PO1715	Mr P Daniel		
RO0430		Mrs J Darbyshie		
RO0431	PO2842	Mr J Darnbrough		
RO0432	PO2845	Mrs C Darnbrough		
RO0433	PO0391, PO0392, PO1764, PO2794	Ms J Davenport		
RO0434		Mr R Davenport		
RO0435		Mrs V Davenport		
RO0436	PO0153	Mr P Davenport		

RO0437		Mrs L Daverin		
RO0438		Mr M Daverin		
RO0439		Miss J Daverin		
RO0440	PO0145, PO0146, PO0812, PO2093, PO3774	Mrs S Davey	Bold & Clock Face Action Group	
RO0441	PO0147, PO0148, PO0813, PO2095, PO2116, PO3775	Mr & Mrs B Davey		
RO0442	PO1072, PO1711	Mr J Davies		
RO0443	PO1197, PO2028, PO2031, PO2997	Miss J Davies		
RO0444	PO2074, PO3038	Ms L Davies		
RO0445	PO2121	Mr R Davies		
RO0446	PO3168, PO3946	Mrs C Dawson		
RO0447	PO2289, PO3170	Mr K Dawson		
RO0448	PO2604	Mr J De Asha	former Rainhill Ward Councillor	
RO0449	PO2807	Mr A Dean		
RO0450	PO2687	Mr D Dearden		
RO0451	PO0592, PO3231	Dr H Denno		
RO0452	PO1227, PO3129	Mr M Dennett		
RO0453	PO2286, PO3166	Mr K Dennett		
RO0454	PO2287, PO3167, PO3945	Mrs M Dennett		
RO0455	PO3217	Mrs S Devenish		
RO0456	PO3218	Mr M Devenish		
RO0457	PO1008	Mr J Dickinson		
RO0458	PO1009	Mrs G Dickinson		
RO0459	PO2322	Mrs H Dilworth		
RO0460	PO0485, PO0486, PO2072, PO3036	Mrs S Dinsmore		
RO0461	PO0120, PO0807, PO1192, PO3417, PO3956	Mrs E Dodd		
RO0462	PO1132, PO1901	Mrs M Dodgson		
RO0463	PO1995	Ms E Dodson		
RO0464	PO1623, PO2734	Mr S Doherty		
RO0465		Mrs J Dolan		
RO0466		Miss B Dolan		
RO0467		Mr D Dolan		
RO0468		Mr N Dolan		
RO0469		Mrs L Dolan		
RO0470		Mr J Dolan		
RO0471		Miss G Dolan		
RO0472	PO0233, PO0573, PO0585, PO0905, PO2350, PO2358, PO3220, PO3226, PO3379, PO3439	Mrs A Donnellan		
RO0473	PO0230, PO0234, PO0574, PO0586, PO2351, PO2359, PO3221, PO3227	Miss M Donnellan		
RO0474	PO0101	Mrs C Donnelly		
RO0475	PO2681	Mr G Douglas		
RO0476	PO1435	Mr & Mrs S & P Dow		
RO0477	PO0344 PO0354, PO1645, PO2755	Mrs L Dowling		
RO0478	PO0384, PO1070, PO1704	Mrs M Downey		
RO0479	PO1071, PO1708	Mr D Downey		
RO0480		Mr F Doyle		
RO0481		Mrs S Doyle		
RO0482		Mr L Doyle		
RO0483	PO1417, PO2580	Mr B Draper		
RO0484	PO1418, PO2581	Mrs J Draper		
RO0485	PO1465, PO3998	Ms K Drewitt		
RO0486	PO1294, PO2409	Ms K Duckworth		

RO0487	PO0339, PO0348, PO0362, PO1049, PO1639, PO1655, PO2759	Mr J Duckworth		
RO0488	PO2700	Mrs D Duffy		
RO0489	PO0444, PO0453, PO1182, PO2017, PO3831	Mr S Duffy		
RO0490	PO0445, PO0446, PO1183, PO2014	Mr M Duffy		
RO0491	PO0447, PO0448, PO1184, PO1185, PO3832	Mrs D Duffy		
RO0492	PO0449, PO0450, PO1186, PO2015	Mrs J Duffy		
RO0493	PO0451, PO0452, PO1187, PO2016	Mr C Duffy		
RO0494		Mr P Duffy		
RO0495	PO2948	Mr P Dumbell		
RO0496	PO0058	Mrs M Dunn		
RO0497		Mr A Dunn		
RO0498	PO2292, PO3171	Mr C Dunn		
RO0499	PO2293, PO2294, PO2295, PO3172, PO3173, PO3174	Mrs S Dunn		
RO0500		Mrs H Dunning		
RO0501	PO2139	Mr A Dunsmore		
RO0502	PO1016, PO1342, PO2633, PO3498, PO3795	Mr M Durrington	Clerk to the Parish Council, Culcheth and Glazebury Parish Council	Mr P Black, Blackfryers Planning and Environmental Consultants
RO0503		Mr P Dutton		
RO0504		Mrs N Dutton		
RO0505	PO0824, PO2143	Miss A Dyas		
RO0506	PO0342, PO0351, PO1642, PO2753	Mr N Dye		
RO0507	PO1196, PO2029, PO2030, PO2996	Mr J Dykhuizen		
RO0508	PO2696	Mrs C Eagles		
RO0509	PO2305	Mrs A Earnshaw		
RO0510	PO3234	Dr C Earnshaw		
RO0511	PO0035	F Eaves		
RO0512		Mr S Ebbs		
RO0513		Miss J Ebbs		
RO0514		Mr B Ebbs		
RO0515	PO3111	Mr & Mrs D Eccles		
RO0516	PO1866, PO2858	Mr S Eden		
RO0517	PO0024, PO0999, PO2618	Mrs M Edwards		
RO0518	PO2619	Mr R Edwards		
RO0519	PO2647	Ms L Edwards		
RO0520	PO0111	Miss D Edwards		
RO0521	PO2068, PO3033	Mrs S Edwards		
RO0522	PO3155	Miss C Edwards		
RO0523	PO3161	Miss A Edwards		
RO0524	PO2369	Mr B Edwards		
RO0525	PO0043, PO2668	Mr & Mrs M&D Ellison		
RO0526		Mrs N Ellison		
RO0527		Mr P Ellison		
RO0528	PO1304, PO1580	Ms N Elsworth	Homes England	
RO0529		Mrs I Evans		
RO0530		Mr J Evans		
RO0531	PO2689	Mrs A Fairclough		
RO0532	PO0322, PO2694	Mr J Fairclough	Rainhill Save Our Green Belt (RSOGB)	

RO0533	PO1737	Mr K Fairclough		
RO0534	PO1739	Mrs C Fairclough		
RO0535		Mrs B Fairclough		
RO0536		Mr C Fairclough		
RO0537		Mrs A Fairhurst		
RO0538		Mr A Fairhurst		
RO0539		Mrs J Fairhurst		
RO0540		Mr A Fallon		
RO0541		Mrs E Fallon		
RO0542	PO0553, PO2306, PO3184, PO3948	Mr C Farmer		
RO0543	PO0572, PO2349, PO3219, PO3289, PO3378, PO3438, PO3584	Mrs C Farmer		
RO0544	PO1124, PO1875	Mr N Farnworth		
RO0545		Miss G Farrar		
RO0546		Mrs J Farrar		
RO0547		Mrs A Farrar		
RO0548		Mr K Farrar		
RO0549	PO1768	Mr D Faulkner		
RO0550		Miss C Feeney		
RO0551	PO2931	Mr & Mrs Fenlon		
RO0552		Mr D Fenney		
RO0553		Mrs D Fenney		
RO0554	PO3290	Mrs R Fenton		
RO0555	PO3293	Mr J Fenton		
RO0556	PO1296, PO1441	Mr M Fenton		
RO0557	PO1572	Mr N Fenton-Brown		
RO0558	PO1034, PO1575	Mr T Fenton-Brown		
RO0559	PO0770, PO3922	Mr J Ferris		
RO0560	PO2835, PO3923	Mrs M Ferris		
RO0561	PO0282, PO1461, PO3996	Mr N Ffrench		
RO0562	PO2912, PO3828	Mr K Fidler		
RO0563	PO0191, PO0528, PO2251	Mrs P Fidler		
RO0564	PO1347	Mr J Field		
RO0565	PO0718, PO0719, PO0720, PO0856, PO0918, PO1510, PO2378, PO2379, PO2428, PO2631, PO3239, PO3241, PO3547	Mr M Fillingham	Eccleston Homes Ltd	Mr A McAteer, McAteer Associates
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RO0567	PO2844	Mr A Finney		
RO0568	PO0656, PO0796, PO0956, PO1169, PO1369, PO1986, PO2525, PO2974, PO3339	Mr S Firth		
RO0569		Mrs A Fisher		
RO0570		Mr P Fishwick		
RO0571	PO0012	Mr T Fitzgerald		
RO0572	PO2599	Dr P Flaherty		
RO0573		Mrs L Flaherty		
RO0574	PO0627, PO0628, PO0725, PO0726, PO0727, PO1012, PO2431, PO2443, PO2444, PO2552, PO3523, PO3680	Mr J Fleming	Gladman Developments	
RO0575	PO2767	Mrs B Fleming		
RO0576	PO2787	Mr E Fleming		
RO0577	PO1246	Mrs R Flinders		
RO0578		Mr M Flinn		
RO0579		Mrs P Flinn		
RO0580		Ms C Flood		
RO0581	PO0048, PO1591, PO2678	K Ford		

RO0582	PO0154, PO0490, PO2170, PO3105, PO3934	Mr A Ford		
RO0583	PO0156, PO0491, PO2172, PO3106, PO3935	Mrs J Ford		
RO0584		Mr K Forester		
RO0585		Mrs L Forester		
RO0586	PO1844, PO2839	Mr D Forshaw		
RO0587	PO1845, PO2840	Mrs P Forshaw		
RO0588	PO0246, PO2927	Mrs L Forshaw	Wargrave big Local	
RO0589		Mrs D Forshaw		
RO0590		Mrs C Forshaw		
RO0591	PO1170, PO1989	Mr M Forsyth		
RO0592	PO1172, PO1991	Mrs G Forsyth		
RO0593	PO2812	Mr J Foster		
RO0594	PO2039, PO3004	Mrs V Foster		
RO0595	PO2040, PO3005	Mr R Foster		
RO0596	PO0502, PO1226	Mrs K Foster		
RO0597	PO0990, PO0991, PO2600, PO2602, PO3790	Ms Y Fovargue	MP, Labour Member for Makerfield	
RO0598	PO0207, PO0208, PO2275, PO2276	Mrs C Fox-Smith		
RO0599	PO1597	Mrs B Foy		
RO0600	PO1602, PO3773	Mr C Foy	Residents of French Fields Crescent	
RO0601		Mr C Foy		
RO0602		Miss M Foy		
RO0603		Mrs J Foy		
RO0604	PO0644, PO0784, PO0944, PO1157, PO1357, PO1972, PO2513, PO2962, PO3327	Mrs R Frearson		
RO0605		Mr B Frodsham		
RO0606	PO1757	Miss E Frodsham		
RO0607	PO1759	Mr R Frodsham		
RO0608	PO1760	Mrs H Frodsham		
RO0609	PO0400, PO1826	Mrs A Frodsham		
RO0610	PO0401, PO1827	Mr K Frodsham		
RO0611	PO1453, PO3991	Ms S Frodsham & Wright		
RO0612	PO3594	Mr C Gale	Star Pubs and Bars	B Cartledge, JWPC Chartered Town Planners
RO0613	PO1464	Mr S Gallagher		
RO0614	PO2942	L Gannon		
RO0615		Mr R Gardam		
RO0616		Ms A Gardam		
RO0617	PO2101, PO3282	Mr S Gardner		
RO0618	PO0175, PO0176	Mr J Garner		
RO0619	PO1230	Miss S Garner		
RO0620	PO0547, PO0676, PO0849, PO0869, PO1280, PO1320, PO2299, PO3386, PO3431, PO3454, PO3855	Mrs E Garner		
RO0621	PO0548, PO0677, PO0850, PO0870, PO1281, PO1321, PO2300, PO3374, PO3432, PO3455, PO3856	Mr A Garner		
RO0622	PO3266	Mrs D Garnett		
RO0623	PO0152	Mrs Z Garnett		
RO0624	PO0822, PO2138, PO3655	Mr P Garrigan	Merseyside Fire & Rescue Services	
RO0625		Dr J Garry		

RO0626	PO0243, PO1388, PO1455, PO2546, PO3648, PO3660, PO3678, PO3692	Ms G Gaskel	United Utilities Water Ltd.	Mr R Jones, CBRE Ltd.
RO0627	PO1616	Mr S Gaskell		
RO0628	PO0663, PO0803, PO0963, PO1179, PO1376, PO2008, PO2532, PO2981, PO3346	Mr J Gaskell		
RO0629	PO0421, PO1913, PO3924	Mr T Gauckwin		
RO0630	PO2076, PO3040	Ms J Gee		
RO0631		Mrs K Gee		
RO0632		Mr A Gee		
RO0633	PO0843, PO2233, PO2234, PO3149	Miss A Geier	On behalf of Rainhill Civic Society (Registered Charity)	
RO0634	PO0127	Mr D Gent		
RO0635	PO0472, PO3021	Mrs J Gent		
RO0636	PO1398	Mrs C Gerrard		
RO0637	PO1399	Mr B Gerrard		
RO0638	PO2408	Mr P Gerrard		
RO0639		Mrs C Gerrard		
RO0640	PO0106	Mr B Gerrard		
RO0641	PO1962	Mr S Gerrard		
RO0642		Mrs P Gerrard		
RO0643	PO2951	Mrs J Gerrard		
RO0644		Miss J Gibbons		
RO0645		Mr J Gibbons		
RO0646	PO2577	Mr S Gibson		
RO0647	PO0131	Mr C Gilbertson		
RO0648	PO0132	Mrs J Gilbertson		
RO0649	PO2096, PO3277	Miss K Giliardi		
RO0650	PO0489, PO3104	Mr M Gill		
RO0651	PO1733	Mrs E Gillard		
RO0652	PO1745	Mr P Gillard		
RO0653	PO0882, PO1000, PO1339	Mr K Gleave		
RO0654	PO2821	Mr S Glennie		
RO0655	PO2822	Mrs V Glennie		
RO0656	PO3311, PO3447, PO3509, PO3591, PO3651	Miss L Glynn-Manley		
RO0657	PO3312, PO3448, PO3510	Mr R Glynn-Manley		
RO0658	PO1457	Mrs B Godwin		
RO0659	PO1458	Mr P Godwin		
RO0660	PO0818, PO0907, PO1290, PO2104, PO2105, PO3349, PO3465, PO3466, PO3605, PO3608, PO3616, PO3653, PO3979	Mrs J Golbourne		
RO0661	PO2947	Mrs D Golden		
RO0662	PO2946	Mrs K Goodall		
RO0663	PO2949	Mr R Goodall		
RO0664	PO1634, PO2750	Mrs M Goode		
RO0665	PO2497, PO3413, PO3573, PO3747	Mr G Goodman	BXB (Cowley Hill) Ltd.	Mr P Tooher, Nexus Planning
RO0666	PO2688	Dr J Gordon		
RO0667	PO0252, PO0686, PO1400, PO2559	Mrs W Gore		
RO0668	PO0262, PO0687, PO1407, PO2563	Mr J Gore		
RO0669	PO1674, PO2774	Mr B Gore		
RO0670	PO3216	Ms C Gorman		
RO0671	PO2940	Mrs L Goudie		
RO0672	PO3066	Mr Gough		

RO0673	PO3067	Mrs S Gough		
RO0674	PO2106, PO3878	Mrs J Goulbourn		
RO0675	PO0819, PO0908, PO1291, PO2107, PO2108, PO2109, PO3350, PO3467, PO3468, PO3606, PO3609, PO3617, PO3654, PO3879, PO3980	Mr J Goulbourn		
RO0676	PO2407, PO2459, PO3744	Mr & Mrs B Grace		
RO0677		Mrs G Grace		
RO0678		P Gray		
RO0679		Ms C Greaves		
RO0680	PO1777	Mr E Green		
RO0681	PO1778	Mrs M Green		
RO0682	PO0460, PO3012	Mr A Green	Spooner Vicars Bakery	
RO0683	PO0461, PO3013	Miss J Green		
RO0684	PO0462, PO3014	Mr J Green		
RO0685	PO0463, PO3015	Mrs D Green		
RO0686		Mrs S Green		
RO0687		Mrs S Green		
RO0688	PO0128, PO0483, PO1200, PO2058, PO3027, PO3928	Mr M Greenacre		
RO0689	PO0432, PO1144, PO1950	Mrs C Greenall		
RO0690	PO1145, PO1958	Mr B Greenall		
RO0691		Mrs M Greenall		
RO0692	PO1389, PO3495	Ms V Gregory		
RO0693	PO0212, PO0549, PO1250, PO2301, PO3947	Mr T Gregory		
RO0694		Mr R Grice		
RO0695		Mrs W Grice		
RO0696		Mr S Grice		
RO0697		Mr J Grice		
RO0698		Mrs A Grice		
RO0699		Mr W Grice		
RO0700	PO1940	Mrs C Griffiths		
RO0701		Mrs E Griffiths		
RO0702	PO0081, PO0398, PO1810, PO2813, PO3919	Mrs D Griffiths		
RO0703		Mrs D Grimes		
RO0704		Mr S Grimes		
RO0705		Miss A Grimes		
RO0706		J Grounds		
RO0707	PO3784, PO3965	Mr R Grundy		
RO0708	PO0283, PO2617	Cllr B Grunewald	Rainhill Ward Councillor, St. Helens Council	
RO0709	PO2149, PO2150	Mr J Gwilliam		
RO0710	PO2173	Mrs S Gwilliam		
RO0711	PO3291	Mr M Hadwin		
RO0712		Mrs C Haines		
RO0713		Mr O Haines		
RO0714		Mr S Haines		
RO0715		Mrs M Hale		
RO0716	PO2718	Mr A Hall		
RO0717	PO1651, PO2762	Miss K Hall		
RO0718	PO0104	Mrs N Hall		
RO0719	PO0105	Mrs C Hall		
RO0720	PO2045, PO3010	Mrs J Hall		
RO0721		Miss S Hall		
RO0722		Mr J Hall		
RO0723	PO3885	Mr S Hall		
RO0724	PO3981	Miss S Hall		

RO0725	PO2578	Mrs S Hallsworth		
RO0726	PO2826	Mr W Hallsworth		
RO0727		Mrs M Halsall		
RO0728	PO1854	Mr D Halsey		
RO0729	PO1624, PO2735	Mr L Hancock		
RO0730	PO2281	Mr G Hand		
RO0731	PO0733, PO1312, PO1524, PO2436, PO2467, PO2468, PO2638, PO3306, PO3409, PO3410, PO3849	C Hanwright		
RO0732	PO0613, PO1477, PO1478, PO2396, PO3365, PO3390, PO3533, PO3537, PO3546, PO3557, PO3564, PO3632, PO3667, PO3710	Mrs J Harding	Home Builders Federation	
RO0733	PO0396, PO2802	Mr N Hardman		
RO0734	PO2589	Ms A Hardy		
RO0735	PO2284, PO3944	Mr P Hardy		
RO0736	PO0276, PO1449, PO2371, PO3988	Mr & Mrs M Scott-Harley		
RO0737		Mrs K Harris		
RO0738	PO2120	Mr P Harris		
RO0739	PO2127, PO3077	Ms C Harris		
RO0740	PO3228	Mr J Harris		
RO0741	PO0372, PO1060, PO1686	Mrs G Harrison		
RO0742	PO0371, PO1059, PO1689	Mr J Harrison		
RO0744	PO1106	Mrs C Harrison		
RO0745	PO0772	Mr D Harrison		
RO0746	PO1917	Mrs G Harrison		
RO0747	PO1918	Miss R Harrison		
RO0748	PO1919	Mr A Harrison		
RO0749	PO0470, PO0471, PO2051, PO3020	Mrs A Harrison		
RO0750		Mr N Harrison		
RO0751		Mrs G Harrison		
RO0752		Mr A Harrison		
RO0753		Mrs R Harrison		
RO0754		Miss N Harrison		
RO0755	PO1251	Mrs H Harrison		
RO0756	PO0564, PO0565, PO1259, PO2320	Mr S Harrison		
RO0757	PO1105	Mr A Harrison		
RO0758	PO2169	Mr J Harrison		
RO0759	PO0667, PO0811, PO1199, PO2034, PO2999, PO3421	Ms F Harrop	ECRA	
RO0760	PO1436	Miss M Hart		
RO0761	PO3085	Mr M Harvey		
RO0762	PO1929, PO2901	Mrs E Hatton		
RO0763		Mr L Hatton		
RO0764		Miss D Hatton		
RO0765		Mrs A Hatton		
RO0766		Dr A Hatton		
RO0767	PO2215, PO3356, PO3839, PO3850, PO3960	Mrs R Hatton		
RO0768	PO2083, PO3047	Mr B Haugh		
RO0769	PO2084, PO3048	Mrs R Haugh		
RO0770	PO0714, PO1475, PO2622	Mr S Haw		
RO0771	PO1039, PO1588, PO2675, PO3818, PO3819, PO3907	Cllr M Haw, Sims, Pearl	Ward Councillors, St. Helens Council	
RO0772		Mrs C Hawley		
RO0773		Mr M Hawley		
RO0774		Miss C Hawley		

RO0775		Mr D Hawley		
RO0776	PO0157	Miss L Haworth		
RO0777	PO2175	Mr I Haworth		
RO0778		Mrs P Hayes		
RO0779		Mrs C Hayes		
RO0780		Mr and Mrs Hayton		
RO0781	PO1232, PO2253, PO3154	Ms J Hayward	JAK Fine Art Printing	
RO0782	PO2400	G Heath		
RO0783	PO0309, PO1530, PO4021	Ms S Heath		
RO0784	PO0310, PO1531, PO4022	Ms M Heath		
RO0785	PO2141, PO2723	Ms B Heaton		
RO0786	PO2067, PO3032	Mrs L Heaton		
RO0787	PO1505	Mr K Hegarty		
RO0788	PO2414	A Hegarty		
RO0789	PO3833	Mr & Mrs J Henderson		
RO0790		Mr I Henderson		
RO0791	PO1117, PO1858	Mr M Hendriksen		
RO0792	PO1118, PO1859	Mrs H Hendriksen		
RO0793	PO1126, PO1887	Mrs P Hendriksen		
RO0794	PO1127, PO1890	Mr G Hendriksen		
RO0795	PO0290, PO1487, PO4005	Ms MJ Henry		
RO0796	PO1053, PO1746	Mrs P Henthorn		
RO0797	PO1665	Mr F Henthorn		
RO0798	PO0773	A Henthorn		
RO0799	PO0087	Mr M Henthorn		
RO0800	PO2592, PO3197	Mrs D Heron		
RO0801	PO1809	Ms G Hesketh		
RO0802	PO2805	Mrs B Hewitt		
RO0803	PO2806	Mr S Hewitt		
RO0804	PO0129	Mrs F Hewitt		
RO0805	PO0130	Mr G Hewitt		
RO0806	PO3286	Mr B Heydon		
RO0807	PO2722	Mrs P Heyes		
RO0808	PO2941	Mr F Heyes		
RO0809		Miss R Heyes		
RO0810	PO1091, PO1749	Mr J Highcock		
RO0811	PO1678	Mr P Hignett		
RO0812	PO1679	Mrs E Hignett		
RO0813	PO1952	Mr K Hill		
RO0814	PO2077, PO3041	Mrs K Hill		
RO0815	PO2137	Mr & Mrs Hill		
RO0816	PO2538	Dr M Hill		
RO0817	PO0506, PO0507, PO0508, PO0509, PO0510, PO1228, PO2203, PO2205, PO3128, PO3131	Mr C Hill		
RO0818	PO0550, PO0551, PO1249, PO2296, PO2302, PO3182, PO3183	Mrs W Hill		
RO0819	PO2348	Mr D Hilton		
RO0820	PO0240, PO2367	Mr M Hindley		
RO0821	PO0162	Mr S Ho		
RO0822	PO2189	Miss D Hockham		
RO0823	PO1397, PO2554	Mr I Hodgson		
RO0824		Mr A Hodgkinson		
RO0825		Mrs L Hodgkinson		
RO0826	PO2669	Ms L Holland		
RO0827	PO2670	Mr S Holland		
RO0828	PO0168, PO2202	Mrs J Holland		

RO0829	PO0180, PO0515, PO0838, PO0903, PO1330, PO1383, PO1384	Mr S Hollowed		
RO0830		Mr C Holmes		
RO0831	PO0250, PO0517, PO0842, PO1310, PO3358	Mrs G Holmes		
RO0833	PO0526, PO1233, PO2250, PO3157, PO3937	Mr G Holmes		
RO0834	PO3187	Mr D Holmes		
RO0835	PO0219, PO3189	Mrs K Holmes		
RO0836	PO1876, PO2860	Mr P Hooton		
RO0837	PO1898, PO2861	Mrs K Hooton		
RO0838	PO1897, PO2862	Mrs V Hooton		
RO0839	PO1896, PO2864	Mr A Hooton		
RO0840	PO1926, PO2865	Mr R Hooton		
RO0841	PO0988	Mrs A Hopkins		
RO0842		Miss D Hopkinson		
RO0843	PO3502	Mrs L Horn	Parkside Action Group	
RO0844	PO1722	Mr K Horne		
RO0845	PO3673, PO3674, PO3676	Mr N Horsley	Mineral Products Association	
RO0846	PO0159	Mr C Horton	Bold & Clock Face Action Group	
RO0847	PO3074	Ms L Houghton		
RO0848	PO3076	Mr K Houghton		
RO0849	PO0519, PO0672, PO0845, PO0865, PO1276, PO1316, PO2240, PO3383, PO3427, PO3450, PO3851	Mrs C Houlihan		
RO0850	PO0520, PO0673, PO0846, PO0866, PO1277, PO1317, PO2241, PO3384, PO3428, PO3451, PO3852	Mr B Houlihan		
RO0851	PO0521, PO0674, PO0847, PO0867, PO1278, PO1318, PO2242, PO3361, PO3429, PO3452, PO3853	Mr R Houlihan		
RO0852	PO1275	Mr D Hoult		
RO0853	PO0049, PO3869, PO3872, PO3875, PO3963	Mr & Mrs J Howard		
RO0854	PO3640, PO2089, PO3783, PO3964	Ms S Howard	Inspector of Ancient Monuments, Historic England	
RO0856	PO0237, PO0587, PO2363	Mrs C Howard		
RO0857	PO0238, PO0588, PO2364	Mr R Howard		
RO0858	PO1841, PO2837	Mrs L Howe		
RO0859	PO2698	Mrs A Howitt		
RO0860	PO0205, PO0542, PO1245, PO2273, PO3942	Ms S Howitt		
RO0861	PO2221	Mr T Howlett		
RO0862	PO0286, PO1476, PO4001	Mr S Hoyle		
RO0863	PO0294, PO1495, PO4008	Mrs K Hoyle		
RO0864	PO1451	Mr D Hualme		
RO0865	PO0084	Mrs J Hudson		
RO0866	PO2558	Mr & Mrs M & S Hughes		
RO0867	PO0018, PO2115	Mr & Mrs C Hughes	Bold & Clock Face Action Group	
RO0868	PO1044, PO1604, PO2713, PO3910	Mr L Hughes		

RO0869	PO1658	Mr D Hughes		
RO0870	PO1659	Mr W Hughes		
RO0871	PO1959	Mr D Hughes		
RO0872	PO0643, PO0783, PO0943, PO1156, PO1356, PO1971, PO2512, PO2961, PO3326	Mrs E Hughes		
RO0873		Mr S Hughes		
RO0874		Mrs S Hughes		
RO0875	PO0668, PO0820, PO1206, PO2110, PO2536, PO3351, PO3469, PO3596, PO3607, PO3612, PO3618, PO3625, PO3780, PO3929	Mrs S Hughes	Bold & Clock Face Action Group	
RO0876		Mrs G Hughes		
RO0877		Miss J Hughes		
RO0878		Mr N Hughes		
RO0879		Mrs E Hughes		
RO0880		Miss N Hughes		
RO0881		Mr G Hughes		
RO0882		Mrs S Hughes		
RO0883	PO1466, PO1932, PO3506, PO3679	Ms M Hull		
RO0884	PO1619	Mr J Hull		
RO0885	PO1933	Mr D Hull		
RO0886		Mr S Hull		
RO0887	PO0172, PO2209, PO3132, PO3936	Miss M Hull		
RO0888		Mr M Hulme		
RO0889	PO1471	Ms A Humphreys		
RO0890	PO0293, PO1493, PO4007	Mr & Mrs JA Hunt		
RO0891	PO0832, PO2185, PO3118	Mr J Hunt		
RO0892		Mr C Hunt		
RO0893		Mrs D Hunt		
RO0894	PO1112, PO1856	Miss E Hurst		
RO0895	PO3776	Mr T Hutchinson		
RO0896	PO2816	Mrs J Iatrou		
RO0897	PO2817	Mr S Iatrou		
RO0898		Mrs S Illingworth		
RO0899	PO2819	Mr P Innes		
RO0900	PO2820	Mrs D Innes		
RO0901		Mr G Insch		
RO0902	PO0493, PO0831, PO1325, PO3114, PO3372	Mrs J Ireland		
RO0903	PO0835, PO1308, PO3298, PO3373	Mr S Ireland		
RO0904	PO0646, PO0786, PO0946, PO1159, PO1359, PO1974, PO2515, PO2964, PO3329	Mr T Irwin		
RO0905		Mr J Isherwood		
RO0906	PO2098, PO3279	Mrs H Javern		
RO0907	PO3871	S Jackson		
RO0908	PO1675	Mrs A Jackson		
RO0909	PO1676	Mr B Jackson		
RO0910		Mrs C Jarmelowicl		
RO0911	PO2590	Mr S Jefferies	National Grid	Lucy Bartley, Wood E&I Solutions UK Ltd
RO0912		Mr L Jelley		
RO0913		Mrs S Jelley		
RO0914	PO1414	Mrs G Jenkins		Mr P Saunders, Savills

RO0915		Mrs K Jensen		
RO0916		Mr C Jensen		
RO0917	PO2494, PO2495	Mr K Jenson		
RO0918	PO3475	Ms K Johnson	Lane Head South Residents Group	
RO0919	PO0034, PO0922, PO1341, PO1514, PO3380, PO3388, PO3398, PO3740, PO3904, PO3975	Mr A Johnson	Highways England	
RO0920	PO1029, PO1568, PO2659	Mrs K Johnson		
RO0921	PO1698, PO2779	Mrs L Johnson		
RO0922	PO2808	Mr P Johnson		
RO0923		Mr K Johnson		
RO0924	PO2097, PO3278	Miss K Johnson		
RO0925	PO3065	Mrs J Johnson		
RO0926	PO3097	Mrs R Johnson		
RO0927	PO3186	Mrs I Johnson		
RO0928	PO0223, PO3194, PO3195	Miss A Johnson		
RO0929	PO3099	Mrs G Johnson		
RO0930	PO3100	Mr P Johnson		
RO0931	PO0021, PO0022, PO0995, PO1448	Ms S Johnston		
RO0932	PO1910, PO2893	Mr A Johnston		
RO0933	PO0840, PO2223	Mr W Johnston		
RO0934	PO0993, PO2605	Mr A Jones		
RO0935	PO0715, PO1484, PO2410, PO2462, PO2625, PO3269, PO3864	Mr A Jones		Mr G Evans, Cassidy & Ashton
RO0936	PO1485	Mr D Jones		
RO0937	PO0312, PO1543, PO4024	Mr D Jones		
RO0938	PO1667, PO2768	Mrs D Jones		
RO0939	PO1668, PO2769	Mr T Jones		
RO0940	PO1066, PO1695	Mrs C Jones		
RO0941	PO0070, PO1803	Cllr A Jones	Rainford Ward Councillor	
RO0942	PO0399, PO1825	Mr M Jones		
RO0943	PO1120, PO1861	Mr R Jones		
RO0944	PO1946	Mrs S Jones		
RO0945	PO1947	Mr G Jones		
RO0946	PO2928	Mr K Jones		
RO0947	PO2929	Mrs J Jones		
RO0948	PO2933	Mrs C Jones		
RO0949	PO2937	Mr M Jones		
RO0950	PO0636, PO0776, PO0936, PO1149, PO1349, PO1964, PO2505, PO2954, PO3319	Mrs J Jones		
RO0951	PO0637, PO0777, PO0937, PO1150, PO1350, PO1965, PO2506, PO2955, PO3320	Mr C Jones		
RO0952	PO0468, PO0469, PO2050, PO3019	Mr A Jones		
RO0953		Mrs S Jones		
RO0954		Mr A Jones		
RO0955		Mr J Jones		
RO0956		Mrs B Jones		
RO0957		Mr D Jones		
RO0958		Mr W Jones		
RO0959	PO3056	Mrs B Jones		
RO0960	PO3422	A Jones		
RO0961	PO3423	Mrs J Jones		
RO0962	PO3107	Mrs L Jones		

RO0963	PO1830, PO2827	Ms S Jones		
RO0964	PO0089, PO2887	Mrs S Jordan		
RO0965	PO2888, PO2889	Mr J Jordan		
RO0966	PO3164	Mr R Jost		
RO0967	PO1122, PO1870	Mrs C Kay		
RO0968	PO1123, PO1871	Mr W Kay		
RO0969	PO2191	Mr I Kay		
RO0970	PO2254	Mrs A Kaye		
RO0971	PO2426	Mr F Kaye		
RO0972	PO1626., O2743	Mr B Keane		
RO0973	PO1627, PO2741	Mrs N Keane		
RO0974		Mr A Keane		
RO0975		Mrs J Keane		
RO0976	PO1906, PO2890	Mr A Keary		
RO0977	PO2411	J Keech	T Wilson and Sons (Farmers) Ltd	
RO0978	PO1944	Mr S Keenaghan		
RO0979	PO2914, PO3830	Mrs C Keenaghan		
RO0980	PO0210, PO2279, PO3162	Mr L Keenaghan		
RO0981	PO0284, PO3870	Mr T Kelly	Billinge Chapel End Parish Council Clerk	
RO0982	PO1003, PO1473	Ms H Kelly		
RO0983	PO1004, PO1474	Mr D Kelly		
RO0984	PO2943	Ms J Kelly		
RO0985		Mr J Kelly		
RO0986		Miss A Kelly		
RO0987	PO0236, PO2361	Mr G Kelly		
RO0988		Mr C Kennedy		
RO0989	PO2122	Mr S Kenyon		
RO0990	PO2123	Mrs S Kenyon		
RO0991		Miss R Kerfoot		
RO0992		Mrs A Kerfoot		
RO0993		Mr J Kerfoot		
RO0994	PO2285	Mrs K Kerfoot		
RO0995	PO3059	Mrs D Kerr		
RO0996		Mr R Ketley		
RO0997		Mr S Ketley		
RO0998		Mrs J Ketley		
RO0999		Mr A King		
RO1000		Mrs L King		
RO1001		C King		
RO1002	PO2148	Miss M King		
RO1003	PO2080, PO3044	Mrs P King-Williams		
RO1004	PO0055	Mr D Kirkham		
RO1005	PO0056	Mrs A Kirkham		
RO1006	PO3244, PO3245, PO3246, PO3247, PO3248, PO3249, PO3250, PO3251, PO3252, PO3253, PO3254, PO3255, PO3256, PO3257	Ms J Kirkman	Department of Health & Social Care	Mr S Peake, WYG
RO1007	PO2081, PO3045	Miss S Kirwan		
RO1008	PO2082, PO3046	Ms K Kirwan		
RO1009	PO0281, PO1460, PO3995	P Kitto		
RO1010	PO0413, PO0414, PO1130, PO1894	Mrs M Kleinhans		
RO1011	PO1116, PO1857	Mr T Kleinhaus		
RO1012	PO1469	Mr MA Knights		
RO1013	PO1808	Mr M Knights		
RO1014		Miss F Knockton		
RO1015	PO2932	Mr C Knowles		
RO1016		Mrs J Knowles		
RO1017		Mr J Knowles		

RO1018	PO2118	S Kramer		
RO1019	PO2219	Miss S Kwan		
RO1020	PO2025	Mr G Lacey		
RO1021	PO2026, PO2992	Mrs A Lacey		
RO1022	PO3235	Mr S Lally	Pilkington / NSG Group	
RO1023		Mrs J Lamb		
RO1024	PO0199, PO0536, PO1239, PO2265, PO2266	Mrs J Lamb		
RO1025	PO1998	Mr P Large		
RO1026	PO1999	Mrs H Large		
RO1027	PO0186, PO1429, PO2247	Mr S Lawrenson		
RO1028	PO2704	Mr H Lawrenson		
RO1029	PO0185, PO2246	Mrs S Lawrenson		
RO1030	PO1840, PO2836	Mr B Lazenbury		
RO1031	PO2298	Mr D Lea		
RO1032	PO2061	Mrs B Leach		
RO1033	PO0027, PO1007, PO1491, PO2628, PO3898	Mrs S Lea-Jones		
RO1034	PO0028, PO1010, PO1499, PO2629, PO3899	Mr D Lea-Jones		
RO1035	PO2197	Mrs G Lea-Wilson		
RO1036	PO3130	Mr N Lea-Wilson		
RO1037	PO0311, PO1537, PO4023	Ms R Leche, Jones, Jones		
RO1038	PO0699	Mr D Lee		
RO1039	PO1567	Ms M Lee		
RO1040	PO3057	Mr & Mrs J Lee		
RO1041	PO1087, PO1725	Mr N Leeming		
RO1042	PO1086, PO1726	Mrs R Leeming		
RO1043		Mrs G Leese		
RO1044		Mr D Leese		
RO1045		Miss A Leigh		
RO1046	PO1266, PO2362, PO3440	Mrs S Lemasurier		
RO1047		Mrs M Lenahan		
RO1048		Mr T Lenahan		
RO1049		Mr M Lenon		
RO1050		Mr B Lester		
RO1051		Ms S Lever		
RO1052		Mrs V Lever		
RO1053	PO0977	Mr M Lewis		
RO1054	PO0277, PO1302, PO1450	Mr & Mrs T Lewis		
RO1055	PO0071	Mrs P Lewis		
RO1056	PO0072	Mr P Lewis		
RO1057	PO3276	Mrs E Lewis		
RO1058	PO0917, PO1303, PO1481, PO2624, PO3304, PO3460, PO3518, PO3623, PO3717, PO3794, PO3972, PO3973, PO4040	Mr G Leyland		
RO1059	PO0037, PO0737, PO0738, PO2385, PO2393, PO3273, PO3307, PO3411	Mr I Leyland		
RO1060	PO2133	Mrs J Leyland		
RO1061		Mrs G Lightfoot		
RO1062	PO0454, PO1188, PO2019	Mrs S Lilley		
RO1063		Miss K Lindley		
RO1064		Mrs G Lindley		
RO1065		Mr A Lindley		
RO1066	PO3672, PO3677	Mrs M Lindsley	The Coal Authority	
RO1067	PO0706, PO1437	Mrs A Liptrot		

RO1068		Miss B Liptrott		
RO1069		Mrs A Liptrott		
RO1070		Mr D Liptrott		
RO1071		Miss F Liptrott		
RO1072	PO0994, PO2606	Ms A Littler		
RO1073	PO1662	Mr W Livesey		
RO1074	PO0752, PO0928, PO1032	Mr D Lloyd	Oak Tree Developments	Mr B Greep, Peter Brett Associates LLP
RO1075	PO2695, PO2717, PO3054	Mr I Lomax		
RO1076	PO0642, PO0782, PO0942, PO1155, PO1355, PO1970, PO2511, PO2960, PO3325	Mrs J Lomax		
RO1077		Miss K Low		
RO1078	PO1529	Ms S Lowe		
RO1079	PO0378, PO0381, PO1702, PO2780	Mr K Lowe		
RO1080	PO0379, PO0380, PO1701, PO2781	Mrs S Lowe		
RO1081	PO3147	Mrs L Lowe		
RO1082	PO3148	Mr P Lowe		
RO1083	PO2701	Mrs A Lunt		
RO1084	PO2712	Mr G Lunt		
RO1085	PO1822	Mr E Lynch		
RO1086	PO1823	Mrs K Lynch		
RO1087	PO0695	Mrs S Lyon		
RO1088	PO0698	Miss L Lyon		
RO1089	PO1831, PO2828	Miss B Lyon		
RO1090	PO1832, PO2829	Mr S Lyon		
RO1091	PO1846, PO2841	Mrs B Lyon		
RO1092	PO1909, PO2892	Mr D Lyon		
RO1093	PO0660, PO0800, PO0960, PO1176, PO1373, PO2005, PO2529, PO2978, PO3343	Mr J Lyon		
RO1094	PO0062	Mr M Lyons		
RO1095	PO0063	Mrs S Lyons		
RO1096	PO0064	Mr A Lyons		
RO1097	PO0065	Mr D Lyons		
RO1098	PO3882	Miss A Macdonald		
RO1099		Mrs R Mackay		
RO1100	PO0184, PO0522, PO2244	Mrs S Mackenzie		
RO1101	PO0523, PO2245, PO3153	Mr S Mackenzie		
RO1102	PO2798	Mr J Macro		
RO1103		Mrs K Maddock		
RO1104	PO2159, PO3096	Mr & Mrs M Magowan & Coles		
RO1105	PO3064	Mr S Maguire		
RO1106	PO1379	Miss L Mahon		
RO1107	PO1204, PO2071	Mr A Makin		
RO1108	PO0144, PO2091	Mr A Makin	Parish Councillor, Bold Parish Council	
RO1109	PO0833, PO2188	Mrs J Makin		
RO1110	PO3275	Mr & Mrs Maloney		
RO1111	PO3446, PO3464, PO3508, PO3590, PO3650	Mrs S Manley		
RO1112	PO1756	Mr J Manley		
RO1113	PO2709	Miss J Mansfield		
RO1114	PO0652, PO0792, PO0952, PO1165, PO1365, PO1982, PO2521, PO2970, PO3335	Mrs H Marcy		
RO1115	PO2693	Mrs M Markey		

RO1116	PO0053, PO0324, PO0634, PO0934, PO1045, PO1605, PO2719, PO3310, PO3528, PO3823, PO3824, PO3825, PO3911, PO4035	Mr K Marr		
RO1117	PO1077, PO1079, PO1718	Dr R Marsh		
RO1118	PO1080, PO1723	Mrs M Marsh		
RO1119	PO1085, PO1724	Mrs R Marsh		
RO1120	PO0428, PO1941	Mrs R Marsh		
RO1121	PO2911, PO3827	Mr E Marsh		
RO1122		Mrs B Marsh		
RO1123	PO3641	Mr S Marsh	Battlefields Trust	
RO1124		I Marshall		
RO1125		Mr R Marshall		
RO1126		Mrs L Marshall		
RO1127	PO1100, PO1797	Mrs A Martin		
RO1128	PO1101, PO1798	Mr M Martin		
RO1129		Mrs A Martin		
RO1130	PO2214	Mr P Martin		
RO1131	PO2217	Miss L Martin		
RO1132	PO0091	Mr N Martindale		
RO1133	PO0092, PO1916	Mrs J Martindale		
RO1134	PO2193, PO3396	Mr L Martland		
RO1135	PO1948, PO2915	Mr A Martlew		
RO1136	PO1949, PO2916	Mrs E Martlew		
RO1137	PO2917, PO2918	Mr A Martlew		
RO1138	PO3449	Dr J Mashedor		
RO1139		Mr J Mason		
RO1140	PO0074	Mrs J Mather		
RO1141	PO0075	Mr D Mather		
RO1142	PO2703	Mr J Matthews		
RO1143	PO0385, PO1705	Mr W McAlister		
RO1144	PO1706	Mrs C McAlister		
RO1145	PO0603, PO0605, PO0606, PO0610, PO0728, PO0729, PO0883, PO0891, PO0892, PO1018, PO1019, PO1289, PO2383, PO2392, PO2398, PO2415, PO2416, PO2432, PO2485, PO2496, PO2635, PO3240, PO3405, PO3406, PO3534, PO3539, PO3549, PO3567, PO3568	Mr S McBride	Persimmon Homes (North West)	
RO1146	PO1134, PO1135, PO1904, PO2885	Mr K McCabe		
RO1147	PO2904	Miss J McCarthy		
RO1148	PO2905	Miss J McCarthy		
RO1149	PO2906	Mr L McCarthy		
RO1150	PO2907	Mrs K McCarthy		
RO1151	PO2908	Mr D McCarthy		
RO1152	PO0651, PO0791, PO0951, PO1164, PO1364, PO1981, PO2520, PO2969, PO3334	Miss E McCarthy		
RO1153		Mr M McCarthy		

RO1154	PO0633, PO0746, PO0926, PO1021, PO1536, PO2446, PO2452, PO2498, PO2646, PO3309, PO3414, PO3463, PO3507, PO3542, PO3554, PO3558, PO3559, PO3574, PO3597, PO3634, PO3657, PO3668, PO3684, PO3685, PO3686, PO3687, PO3697, PO3700, PO3711, PO3756, PO3799, PO3969	Ms K McClean	Taylor Wimpey UK Limited	Mr B O'Connor, Lichfields
RO1155	PO1753	Mrs A McClean		
RO1156	PO3822	K McCormack		
RO1157	PO0422, PO1137, PO1922	Miss L McCormack		
RO1158		Mr H McCormick		
RO1159	PO0837, PO1309, PO3236, PO3299, PO3355, PO3426, PO3656, PO3715	Mrs C McDermott		
RO1160	PO3873	Cllr D McDonnell	St. Helens Council	
RO1161		Miss J McElroy		
RO1162		Mr J McElroy		
RO1163	PO0150	Mrs M McElroy		
RO1164	PO0662, PO0802, PO0962, PO1178, PO1375, PO2007, PO2531, PO2980, PO3345	Miss J McEvoy		
RO1165	PO0302, PO0890, PO1513, PO3369	Mr I McFegan	Rainford Action Group	
RO1166	PO0439, PO1976	Mr I McFegan		
RO1167	PO0440, PO1977	Miss L McFegan		
RO1168	PO0441, PO1987	Mrs P McFegan		
RO1169	PO0429, PO1942	Mrs E McGowan		
RO1170	PO0514, PO0902, PO2218, PO3381	Mr C McGowan		
RO1171	PO0313, PO1563, PO4026	Mr S McKenna		
RO1172	PO0314, PO1564, PO4027	Mr J McKenna		
RO1173	PO0315, PO1565, PO4028	Miss R McKenna		
RO1174	PO0318, PO1579, PO4032	Ms N McKenna		
RO1175	PO3180	Mrs K McKeon		
RO1176	PO3181	Miss A McKeon		
RO1177	PO0224, PO0563, PO1258, PO2319, PO3949	Mr J McKeon		
RO1178	PO0570, PO0680, PO0853, PO0872, PO1283, PO1323, PO2346, PO3376, PO3436, PO3457, PO3858	Mr P McKeon		
RO1179	PO0571, PO0681, PO0854, PO0873, PO1284, PO1324, PO2347, PO3377, PO3437, PO3458, PO3859	Mr H McKeon		
RO1180	PO3090	Mrs H McKeown		
RO1181	PO3122	Mr T McKeown		
RO1182	PO1114, PO1892	Mr A McLoughlin		
RO1183	PO1115, PO1893	Mrs A McLoughlin		
RO1184	PO0678, PO0871, PO1282, PO0851, PO3857, PO1322, PO0566, PO2323, PO3433, PO3375, PO3456, PO1260, PO2324, PO0225, PO3950, PO0567	Mr M McLoughlin		
RO1185	PO1540	Ms J McMahan		
RO1186	PO2103, PO3284	Mr H McManus		

RO1187	PO1677, PO2775	Mr J McVeigh		
RO1188	PO0203, PO0540, PO1243, PO2271, PO3940	Ms F Meli		
RO1189	PO0300, PO1508, PO4014	Mrs L Mellors		
RO1190	PO0301, PO1509, PO4015	Mr A Mellors		
RO1191		Miss J Melvin		
RO1192	PO0239, PO2366, PO3230	Mr E Mercer		
RO1193	PO0296, PO1497, PO4010	Ms J Meredith		
RO1194	PO0297, PO1498, PO4011	Mr J Meredith		
RO1195	PO2232	Miss J Merrills		
RO1196	PO2092	Mrs B Mertens		
RO1197		Mr F Mertens		
RO1198	PO1092, PO1751, PO1752, PO2788	Mrs M Metcalf		
RO1199		Mrs E Middleton		
RO1200		Mr P Middleton		
RO1201	PO0329, PO0330, PO1631, PO2746	Miss N Miller		
RO1202	PO2171, PO3610	Mr A Miller		Mr R Rawlinson, Acland Bracewell Surveyors Limited
RO1203	PO0160, PO0161, PO0494, PO0495, PO1223, PO2190, PO3121, PO3124	Mrs H Miller		
RO1204	PO0163, PO0164, PO0496, PO0497, PO1224, PO2192, PO3123, PO3125	Mr A Miller		
RO1205	PO1408, PO2564, PO3786, PO3888, PO3983	Mrs P Milligan		
RO1206	PO2579	Mr J Milligan		
RO1207	PO2944	Mrs E Mills		
RO1208		Mrs S Milner		
RO1209		Mr R Miloro		
RO1210	PO3175	Miss J Milton		
RO1211		Mrs L Mines		
RO1212		Mr D Mines		
RO1213		Mrs P Mines		
RO1214	PO3188	Mrs J Mingham		
RO1215	PO0016, PO0704	Cllr C Mitchell	Deputy Leader of the Council, Warrington Council	
RO1216	PO1006, PO1490, PO2627	Ms C Mitchell	Parish Councillor, Burtonwood and Westbrook Parish Council	
RO1217	PO0082	Mrs P Mitchell		
RO1218	PO0158	Mrs M Mitchell		
RO1219	PO0402, PO0403, PO1834, PO2831	Mr R Mitten		
RO1220	PO0228	Mr S Molyneux		
RO1221		Mrs J Molyneux		
RO1222	PO3117	Mr M Montgomery		
RO1223	PO0431, PO2921	Mr & Mrs Montrose		
RO1224		Mr C Mooney		
RO1225	PO3271	C Moore		
RO1226	PO3272	B Moore		
RO1227	PO2711	Mrs S Moore		
RO1228	PO2934	Mr N Moore		
RO1229		Mrs M Moore		
RO1230	PO2425	Mr S Moore	Sutton Parish Church of England	
RO1231		Mr K Moores		

RO1232	PO0755	Mr I Moorhouse		
RO1233	PO1577	Ms C Moran		
RO1234	PO1848, PO2846	Mrs M Moran		
RO1235	PO1850, PO2848	Mr C Moran		
RO1236		Mrs K Moran		
RO1237	PO3083	Mr R Moran		
RO1238		Mrs C Morear		
RO1239	PO0685, PO0767, PO0972, PO1817, PO3302, PO3315, PO3520, PO3531	Mrs M Morgan		
RO1240		Mrs V Morgan		
RO1241	PO0245, PO0671, PO0823, PO0841, PO0906, PO1210, PO1271, PO1300, PO1328, PO1329, PO1395, PO3357, PO3382, PO3619	Mr C Morgan		
RO1242		Mr G Morley		
RO1243		Mrs A Moron		
RO1244	PO0036, PO0601, PO0607, PO0611, PO0629, PO0630, PO0734, PO0735, PO0736, PO0859, PO0860, PO0862, PO0863, PO0877, PO0923, PO1273, PO1315, PO1393, PO1525, PO2399, PO2469, PO2639, PO2640, PO2641, PO3462, PO3524, PO3550, PO3569, PO3580, PO3624, PO3649, PO3681, PO3735, PO3750, PO3863, PO3905	Mr D Miller	Miller Homes	Mr D Ingram, Barton Willmore
RO1245	PO1652	Mr F Morris		
RO1246	PO1657	Mrs H Morris		
RO1247	PO0387, PO0388, PO1082, PO1720	Mrs A Morris		
RO1248		Mr B Morris		
RO1249	PO3138	Mrs A Morris		
RO1250	PO0103	Mr T Morrison		
RO1251		Mrs L Morrison		
RO1252		Mr A Morrissey		
RO1253	PO0085	Mr C Moseley		
RO1254	PO1815	Mrs G Moss		
RO1255		Mrs M Moss		
RO1256		Mr T Moss		
RO1257		Mr C Moss		
RO1258	PO3176	Mr P Mouldsdaie		
RO1259	PO0424, PO0425, PO0426, PO0427, PO1138, PO1923, PO1924, PO2898	Mrs P Moville		
RO1260		Mr P Moville		
RO1261		Mr P Mower		
RO1262	PO0178	Mrs J Moxon		
RO1263	PO0179	Mr S Moxon		
RO1264		Miss V Mozindde		
RO1265	PO0710, PO1440	Mr K Mulholland		
RO1266	PO0133, PO3959	Mr A Mullock		
RO1267		Miss S Mulot		
RO1268	PO1102, PO1799	Mrs M Munns		
RO1269	PO0008, PO0267, PO1412, PO2572, PO3787, PO3889	Mrs MF Murphy	ECRA	
RO1270	PO0009, PO0268, PO1413, PO2573, PO3788, PO3890	Mr P Murphy	ECRA	
RO1271	PO1447	Mr & Mrs A Murphy		

RO1272	PO1463	Mr T Murphy		
RO1273		Miss J Murphy		
RO1274		Mrs A Murphy		
RO1275		Mr W Murphy		
RO1276		Mrs B Murphy		
RO1277		Mr B Murphy		
RO1278	PO2113	Mrs Murphy		
RO1279		Miss M Murray		
RO1280		Mrs A Murray		
RO1281		Mr W Murray		
RO1282		Mr J Murtagh		
RO1283		Mrs V Murtagh		
RO1284		Mrs S Musgrove		
RO1285		Mr R Musgrove		
RO1286		Mr P Musgrove		
RO1287		Mrs J Musgrove		
RO1288	PO0278, PO1512, PO2461, PO2610, PO3793, PO3895, PO3989	Mr S Muskett		
RO1289	PO0029, PO1011, PO1501, PO2630, PO3901	Mr B Muskett		
RO1290	PO2186	Mr K Muskett		
RO1291	PO0498, PO2194, PO2195, PO2196	Mrs B Muskett		
RO1292	PO1523	Cllr L Mussell	Rainford Ward Councillor	
RO1293	PO2692	Mr M Myers		
RO1294	PO0419, PO1133, PO1903	Mrs C Naylor		
RO1295	PO3095	Mr S Naylor		
RO1296	PO3140	Mrs J Naylor		
RO1297	PO3091	Cllr G Neal	Windle Ward Councillor	
RO1298	PO3061	Mr P Neil		
RO1299		Mr G Neil-Jones		
RO1300	PO1661, PO2785	Miss J Nelson		
RO1301	PO0830, PO2176	Mr D Nevin		
RO1302	PO0155	Mr R Nevitt		
RO1303	PO1843	Mrs C Newcombe		
RO1304	PO1446, PO1914	Mrs F Newton		
RO1305	PO1847	Mrs E Newton		
RO1306	PO1915	Mr C Newton		
RO1307	PO0109	Mrs A Newton		
RO1308	PO2225	Mr G Newton		
RO1309	PO0060, PO1773, PO2796, PO3915	Mr R Nickson		
RO1310	PO0061, PO1774, PO2797, PO3916	Mrs B Nickson		
RO1311		Mr I Nocton		
RO1312		Mr G Nolan		
RO1313	PO2100, PO3281	Mr S Nolan		
RO1314	PO2134	Mrs C Nolan		
RO1315		Miss J Norman		
RO1316	PO0100	Mr S North		
RO1317		Mr A Nuttal		
RO1318	PO0015, PO2593	Mrs S Oakes		
RO1319	PO0025, PO1470, PO2620	Mr J Oakes		
RO1320		Mrs M Oates		
RO1321	PO1261, PO2328, PO2329, PO3434	Miss K O'Brien		
RO1322	PO1262, PO2330, PO2331, PO3435	Mr E O'Brien		

RO1323	PO1263, PO2332, PO2333, PO3199	Mrs J O'Brien		
RO1324	PO0554, PO0555, PO0556, PO0557, PO0558, PO1253, PO1254, PO2307, PO2308, PO2309, PO2310, PO3185	Mr P O'Brien		
RO1325	PO0285, PO1467, PO3999	Ms S O'Connor		
RO1326	PO2114	Mr E O'Connor		
RO1327	PO2078, PO3042	Ms E O'Donnell		
RO1328	PO0836	Mrs D O'Donovan		
RO1329		Mr P Ody		
RO1330		Mrs M Ody		
RO1331		Mr H Ody		
RO1332		Mrs S Ody		
RO1333	PO2336, PO3202, PO3208	Master H O'Grady		
RO1334	PO2337, PO3203, PO3207	Miss R O'Grady		
RO1335	PO2338, PO3204, PO3211	Mr A O'Grady		
RO1336	PO2339, PO3205, PO3212	Mrs S O'Grady		
RO1337	PO3084	Mr D O'Hagan		
RO1338	PO3093	Mrs P O'Hagan		
RO1339	PO3094	Mr B O'Hagan		
RO1340	PO2142, PO3082	Cllr D O'Keefe		
RO1341	PO1660, PO2765	Mr R Oliver		
RO1342	PO1618, PO2112, PO2731	Mr M Olley		
RO1343	PO2128, PO3930	Miss C O'Neile		
RO1344	PO2129	B O'Neile		
RO1345	PO2130, PO3931	Mrs P O'Neile		
RO1346	PO1765	Mr P O'Neill		
RO1347	PO1766	Mrs C O'Neill		
RO1348	PO0078	Mrs M O'Neill		
RO1349	PO0079	Mr J O'Neill		
RO1350	PO0326, PO0887, PO1607, PO1608, PO2422, PO2721, PO3300, PO3912, PO3974	Mr A Onyett		
RO1351	PO3049	Miss S Orford		
RO1352	PO0138	Mr N Orford		
RO1353	PO3050	Miss C Orford		
RO1354	PO3051	Mrs L Orford		
RO1355	PO3052	Mr P Orford		
RO1356	PO3053	Miss F Orford		
RO1357		Miss H Osguthorpe		
RO1358		Mr D Owen		
RO1359		Mrs A Owen		
RO1360		Mrs K Owen		
RO1361		Mr D Owen		
RO1362	PO3137	Mr J Owen		
RO1363		Mr M Owens		
RO1364	PO0121, PO0458, PO0808, PO1193, PO2993, PO3418, PO3957	Mrs I Oxford		
RO1365	PO0122, PO0459, PO0809, PO1194, PO2994, PO3419, PO3958	Mr D Oxford		
RO1366	PO3296	Mr M Paget		
RO1367	PO2086	Mr G Parker		
RO1368	PO0140	Mrs F Parker		
RO1369	PO2535, PO3595	Mr C Parkes		
RO1370	PO1609, PO2725	Mrs J Parkinson		
RO1371	PO1628, PO2742	Mr B Parkinson		
RO1372	PO0404, PO0411, PO1121, PO1884, PO2868, PO3169	Mrs G Parkinson		

RO1373	PO0479, PO0480, PO2055, PO3025	Mr D Parkinson		
RO1374	PO3069	Mrs K Parkinson		
RO1375	PO0166, PO0167, PO0248, PO0504, PO0505, PO0518, PO0844, PO1220, PO1231, PO1332, PO2180, PO2201, PO2239, PO2447, PO3127, PO3360, PO3708	Mr P Parkinson		
RO1376	PO0067	Mrs W Parr		
RO1377	PO2032	Mr W Parr		
RO1378		Miss C Parr		
RO1379	PO0151, PO3086	Mrs P Parr		
RO1380	PO2282, PO3163	Dr H Parr	Garswood Surgery	
RO1381		Mr C Parry		
RO1382	PO3072	Mrs P Parsons		
RO1383	PO1672, PO2783	Mrs M Pate		
RO1384		Mr A Pattenden		
RO1385		Mrs G Pattenden		
RO1386	PO0165	Mrs S Pattenden		
RO1387		Mrs B Patterson		
RO1388		Mr R Patterson		
RO1389		Mrs J Pattison		
RO1390	PO0406, PO1878, PO2875	Mrs F Pearce		
RO1391	PO2044, PO3009	Mr J Pearson		
RO1392		Mr M Peers		
RO1393		Mrs A Penketh		
RO1394		Mr A Pennington		
RO1395		Mrs D Pennington		
RO1396	PO0386, PO1074, PO1713	Mrs G Peplow		
RO1398	PO2936	Mr D Phillips		
RO1399		Mrs N Phillips		
RO1400	PO2117	Mr & Mrs Phillips		
RO1401		Mr C Phillips		
RO1402		Mr D Pickavance		
RO1403	PO2707	Mrs R Pickles		
RO1404	PO0337, PO0346, PO0356, PO0360, PO1047, PO1637, PO1647, PO2757	Mr C Picton		
RO1405	PO0338, PO0347, PO0357, PO0361, PO1048, PO1638, PO1648, PO2758	Mrs S Picton		
RO1406	PO0340, PO0349, PO0358, PO0363, PO1050, PO1640, PO1649, PO2760	Miss W Picton		
RO1407	PO0341, PO0350, PO0359, PO0364, PO1051, PO1641, PO1650, PO2761	Mr S Picton		
RO1408	PO2818	Mrs D Pierce		
RO1409		Mr A Piert		
RO1410	PO1819, PO3920	Mrs G Pilkington		
RO1411	PO1098, PO1795	Mrs B Pilkington		
RO1412	PO1099, PO1796	Mr C Pilkington		
RO1413	PO1208	Mr D Pill		
RO1414	PO0088	Mr T Pimblett		
RO1415	PO0345, PO0355, PO1646, PO2756	Mr H Pimblett		
RO1416	PO2601, PO2672	Ms G Pinder	Clerk to the Parish Council, Rainhill Parish Council	
RO1417	PO1103, PO1804, PO1805, PO2810	Mr K Ping		

RO1418	PO1806, PO2811	Mrs G Ping		
RO1419	PO0622, PO2434	Mr H Platt		
RO1420	PO0455, PO2022, PO2988, PO3926	Mr N Platt		
RO1421	PO0456, PO2023, PO2989, PO3927	Mrs C Platt		
RO1422	PO2990	Mr A Platt		
RO1423	PO2079, PO3043	Mrs S Platt		
RO1424	PO1842, PO2838	Mrs R Podesta		
RO1425	PO1849, PO2847	Mr J Podesta		
RO1426	PO1908, PO2891	Miss J Podesta		
RO1427	PO0336, PO1635, PO2751	Miss K Pollitt		
RO1428		Mr M Poole		
RO1429		Ms A Poole		
RO1430	PO1017, PO1343, PO2634, PO3499, PO3796	Mr M Pope	Clerk to the Parish Council, Croft Parish Council	Mr P Black, Blackfryers Planning and Environmental Consultants
RO1431	PO1869, PO2867	Mr M Porchau-Murray		
RO1432	PO1928, PO2900	Mr B Porter		
RO1433	PO0435, PO0436, PO1956, PO2925	Mr S Postlethwaite		
RO1434	PO0437, PO0438, PO1957, PO2926	Mrs J Postlethwaite		
RO1435		Mrs S Potter		
RO1436	PO0298, PO1500, PO4012	Mr & Mrs N & H Powell		
RO1437	PO1566	Ms J Powell		
RO1438	PO0192, PO0530, PO2255	Mr S Pownall		
RO1439	PO0193, PO2256, PO3881	Dr D Pownall		
RO1440	PO1993	Mr G Poynton		
RO1441	PO1994	Mrs L Poynton		
RO1442	PO2046, PO3011	Mrs S Prendergast		
RO1443	PO0367, PO0368, PO1057, PO1687	Mrs M Prescott		
RO1444	PO2343	Mr A Prescott		
RO1445	PO3260	M Preston		
RO1446	PO2680	Mr C Preston		
RO1447	PO2154	Mr A Preston		
RO1448	PO2157	Mrs S Preston		
RO1449	PO3196	Mrs B Preston		
RO1450	PO2321	Mr G Preston		
RO1451	PO2555	Mrs J Price		
RO1452	PO2557	Mr D Price		
RO1453	PO2073, PO3037	Miss M Price		
RO1454		Miss S Price		
RO1455		Mr H Price		
RO1456		Mrs L Price		
RO1457		Mr M Price		
RO1458	PO1382, PO3112	Mr B Price		
RO1459	PO0280, PO1454, PO3992	Mr & Mrs C Pritchard		
RO1460	PO1736	Mrs J Pritchard		
RO1461	PO1867, PO2859	Mr G Pye		
RO1462	PO1883, PO2882	Mr C Pye		
RO1463	PO2036, PO3001	Mr S Pye		
RO1464	PO2136	Mr S Pyke		
RO1465	PO1313	Mrs A Quayle		
RO1466	PO0393, PO1093, PO1769	Mr T Quinn		
RO1467	PO2699	Ms C Quirk		
RO1468	PO1683	Mrs E Quirk		
RO1469	PO1684	Mr N Quirk		

RO1470	PO0635, PO0775, PO0935, PO1148, PO1348, PO1963, PO2504, PO2953, PO3318	Mrs S Railton		
RO1471	PO0654, PO0794, PO0954, PO1167, PO1367, PO1984, PO2523, PO2972, PO3337	Mr H Railton		
RO1472	PO0487, PO0488, PO0669, PO0670, PO0827, PO0828, PO0966, PO0967, PO1213, PO1215, PO1380, PO1381, PO2152, PO2161, PO2539, PO2540, PO3088, PO3098, PO3353, PO3354, PO4038	Mr M Railton		
RO1473	PO0657, PO0797, PO0957, PO1173, PO1370, PO2000, PO2526, PO2975, PO3340	Mr G Railton		
RO1474	PO0658, PO0798, PO0958, PO1174, PO1371, PO2001, PO2527, PO2976, PO3341	Mr L Railton		
RO1475	PO0003, PO0254, PO1403, PO2560	Mrs C Rank		
RO1476	PO0004, PO0255, PO1404, PO2561	Mr R Rank		
RO1477	PO3887	Mrs B Ratcliffe		Mr S Glenn, Northern Trust
RO1478	PO1829	Mr E Ratcliffe		
RO1479	PO1863, PO2855	Mr C Ratcliffe		
RO1480	PO2066, PO3031	Mrs C Ratcliffe		
RO1481		Mr N Ratcliffe		
RO1482		Ms S Ratcliffe		
RO1483		Mrs S Rattigan		
RO1484		Mr J Rattigan		
RO1485	PO2158, PO3092	Miss A Rawsthorne		
RO1486	PO1286	Mr J Rea		
RO1487	PO2714	Mrs M Rea		
RO1488	PO1415	Mrs S Redman		
RO1489	PO1416	Mr S Redman		
RO1490		Miss J Rees		
RO1491	PO1885, PO2883	Mr K Rentoumis		
RO1492	PO0247, PO1333, PO2373, PO2448, PO3238	Mr R Reynolds		
RO1493	PO1615	Mr D Richards		
RO1494	PO0545, PO1387, PO3395	Mr P Richards		
RO1495	PO0665, PO0805, PO0965, PO1181, PO1378, PO2010, PO2534, PO2983, PO3348	Mr B Richardson		
RO1496	PO1288	Mrs J Richardson		
RO1497	PO1532	Ms K Richmond		
RO1498	PO2423	Mrs A Ridd		
RO1499	PO2697	Dr J Ridyard		
RO1500	PO2433	Mrs K Rigby		
RO1501	PO2658	Mr E Rigby		
RO1502	PO1598	Mr M Rigby		
RO1503	PO1663	Mrs C Rigby		
RO1504	PO1791	Mrs G Rigby		
RO1505	PO0107	Mrs M Rigby		
RO1506	PO2059	Mrs P Rigby		
RO1507		Mr F Rigby		
RO1508		Mrs D Rigby		
RO1509		Miss D Rigby		
RO1510		Miss C Rigby		
RO1511	PO1920, PO2895	Ms K Riley		

RO1512	PO2167	Mrs H Riley		
RO1513	PO0499, PO1225, PO2198, PO3397, PO3860	Mrs V Riley		
RO1514	PO0501, PO0834, PO3425	Mr D Riley		
RO1515	PO0513, PO2216, PO3954	Mr J Riley		
RO1516	PO2168	Mr R Riley		
RO1517	PO1056, PO1685	Miss G Rimmer		
RO1518	PO2060	Mrs B Rimmer		
RO1519	PO2160	Mr N Rimmer		
RO1520		Mr A Ritchie		
RO1521		Mr J Robers		
RO1522	PO1670, PO2770	Mrs M Roberts		
RO1523	PO1669, PO2786	Mr J Roberts		
RO1524	PO0365, PO1052, PO1731, PO2763	Mrs G Roberts		
RO1525	PO0764	Ms J Roberts		
RO1526		Mrs J Roberts		
RO1527		Mr M Roberts		
RO1528	PO3058	Mr & Mrs J Roberts		
RO1529	PO2207	Mr A Roberts		
RO1530	PO2208	Mrs C Roberts		
RO1531	PO1761, PO2792, PO3913	Mrs G Roberts		
RO1532	PO1763, PO2793, PO3914	Mr G Roberts		
RO1533	PO1784, PO2803, PO3917	Mr S Roberts		
RO1534	PO1785, PO2804, PO3918	Mrs N Roberts		
RO1535	PO1793	Mr W Robinson		
RO1536	PO1862, PO2854	Mr S Robinson		
RO1537		Miss A Robinson		
RO1538		Mr D Robinson		
RO1539	PO3642, PO3643, PO3644, PO3645, PO3977	Mr S Robson	Lancashire Gardens Trust	
RO1540	PO0641, PO0781, PO0941, PO1154, PO1354, PO1969, PO2510, PO2959, PO3324	Mrs H Roby		
RO1541	PO0659, PO0799, PO0959, PO1175, PO1372, PO2002, PO2528, PO2977, PO3342	Mr I Roby		
RO1542	PO0661, PO0801, PO0961, PO1177, PO1374, PO2006, PO2530, PO2979, PO3344	Mrs E Roby		
RO1543		Miss E Roby		
RO1544		Miss A Roby		
RO1545	PO0220, PO0560, PO1256, PO2315	Mr A Rooke		
RO1546	PO0222, PO0561, PO2317	Mrs A Rooke		
RO1547	PO3263	Mr M Roper		
RO1548	PO3264	Mrs S Roper		
RO1549	PO0171, PO1229, PO2206	Mr P Roper		
RO1550	PO3836	Mrs M Rosbotham		
RO1551	PO2716	Mr D Roscoe		
RO1552	PO2938	Mr M Rossiter		
RO1553	PO2939	Mrs H Rossiter		
RO1554	PO1539	Ms F Rothwell		
RO1555	PO0701, PO0985, PO1424, PO2587, PO3892	Mr K Roughley		
RO1556	PO0700, PO0983, PO1422, PO2585, PO3891	Ms P Roughley		
RO1557	PO1013, PO1014, PO1015, PO2632	E Roughsedge		
RO1558	PO1031, PO2661	Mr K Roughsedge		
RO1559	PO0014, PO1295	Mr P Round		
RO1560	PO1620, PO2736	Mrs D Rowe		

RO1561	PO1664	Miss M Rowlands		
RO1562	PO1494	Ms J Rudin		
RO1563	PO1874, PO2871	Mr K Rushton		
RO1564	PO0054	Mrs H Rusk		
RO1565		Miss L Russell		
RO1566	PO3267	Mrs M Rutherford		
RO1567	PO0020, PO0712, PO1445, PO2608	Mr G Ryder	Rainhill Civic Society	
RO1568	PO3838	Mr J Ryder		
RO1569	PO1824	Mrs A Sainsbury		
RO1570		Mrs K Sampson		
RO1571	PO1128, PO1888	Mrs J Savage		
RO1572	PO1129, PO1889	Mr P Savage		
RO1573	PO2069	Mrs J Saxon		
RO1574	PO3470, PO3611, PO3658, PO3659, PO3661, PO3675, PO3689, PO3985, PO3986	Mr S Sayce	The Environment Agency	
RO1575		Mr M Scales		
RO1576		Mr R Scales		
RO1577		Mrs J Scales		
RO1578		Miss J Scales		
RO1579	PO1084, PO1717	Mrs S Scarisbrick		
RO1580	PO1081, PO1719	Mr A Scarisbrick		
RO1581	PO1907	Mrs Y Scholefield		
RO1582	PO1653	Mr J Scott		
RO1583	PO1734	Mrs C Scott		
RO1584	PO0213	Miss V Scott		
RO1585	PO0214	Mr P Scott		
RO1586	PO0215	Mrs C Scott		
RO1587	PO0216	Mrs T Scott		
RO1588	PO0217	Mrs C Scott		
RO1589	PO2313, PO3190, PO3840	Mrs G Scott		
RO1590	PO2314, PO3191, PO3841	Mr S Scott		
RO1591	PO2370	Mrs S Scott		
RO1592	PO0562, PO1257, PO2318	Mrs J Scott-Harley		
RO1593	PO2119	Mr M Scriven		
RO1594	PO1421	Ms G Scutt		
RO1595	PO1709	Mr M Seagaeaves		
RO1596	PO0708, PO1438	Mr P Seddon		
RO1597	PO1953	Mrs M Sessford		
RO1598	PO3143, PO3359	Mr K Seward		
RO1599	PO2710	Mrs L Shacklady		
RO1600		Mr H Shaker		
RO1601	PO0763	Mrs E Sharples		
RO1602		Mr D Sharples		
RO1603		Mrs M Sharples		
RO1604		Mr R Sharrock		
RO1605		Mrs J Sharrock		
RO1606	PO2063, PO3028	Mr D Shaw	D.J Shaw Sons	
RO1607		Mrs J Shaw		
RO1608	PO3113	Mr N Shawcross		
RO1609	PO3876	Mr D Shephard		
RO1610	PO1880, PO2879	Mr D Shufflebotham		
RO1611	PO0415, PO1899, PO2884	Mrs E Shufflebotham		
RO1612	PO0001, PO3662, PO3690	Dr J Sills		
RO1613	PO2726	Miss M Simcox		
RO1614	PO0093	Miss A Simcox		
RO1615	PO1754, PO2790	Mrs I Simmons		
RO1616	PO1599	Mr and Mrs D Simpson		
RO1617	PO0102	Mrs D Simpson		
RO1618	PO3198	Mr A Simpson		
RO1619		Mrs A Siner		

RO1620	PO0648, PO0788, PO0948, PO1161, PO1361, PO1978, PO2517, PO2966, PO3331	Miss W Singleton		
RO1621	PO0059, PO2795	Mr & Mrs C Sisson		
RO1622	PO1772	Mr C Skelly		
RO1623	PO2851	Mrs C Skerritt		
RO1624	PO2852	Mr E Skerritt		
RO1625	PO0829, PO2162	Mr B Skingle		
RO1626	PO1730, PO2771	Mrs R Skinner		
RO1627	PO0409, PO0410, PO1881, PO2880	Mrs C Skinner		
RO1628		Mr D Skinner		
RO1629	PO1489, PO2626	Mr P Slater		
RO1630	PO1201	Mr W Smallshaw		
RO1631	PO1202	Mrs S Smallshaw		
RO1632	PO1203	Mr J Smallshaw		
RO1633	PO3842, PO3845, PO3900, PO3962, PO3982, PO4039	Ms J Smith		
RO1634	PO0031, PO0251, PO0599, PO0600, PO0604, PO0609, PO0614, PO0625, PO0626, PO0721, PO0722, PO0723, PO0724, PO0857, PO0858, PO0888, PO0889, PO0895, PO0896, PO0919, PO0920, PO0921, PO1270, PO1327, PO1511, PO2380, PO2381, PO2382, PO2390, PO2397, PO2427, PO2429, PO2430, PO2441, PO2442, PO2450, PO2451, PO2453, PO2463, PO2464, PO2484, PO2488, PO2489, PO3404, PO3441, PO3442, PO3444, PO3445, PO3461, PO3471, PO3538, PO3548, PO3565, PO3566, PO3579, PO3583, PO3880, PO3968, PO3970, PO3971	Mr A Smith	Torus 62 Limited	Mr I Gilbert, Barton Wilmore
RO1635	PO2412	Mr P Smith		
RO1636	PO2682	J Smith		
RO1637	PO2683	H Smith		
RO1638	PO1612, PO2729	Mr A Smith		
RO1639	PO1063, PO1691	Mrs L Smith		
RO1640	PO1064, PO1692	Mr C Smith		
RO1641	PO1110, PO1853, PO2853	Mr K Smith		
RO1642	PO0418, PO1902	Mr K Smith		
RO1643		Mr A Smith		
RO1644		Mrs C Smith		
RO1645		Mrs J Smith		
RO1646		Mr S Smith		
RO1647		Ms R Smith		
RO1648		Mr J Smith		
RO1649		Mrs J Smith		
RO1650	PO2146	Mr D Smith		
RO1651	PO0227, PO2326	Mr R Smith		
RO1652	PO2075, PO3039	Mr R Smout		
RO1653	PO3063	Mr C Southward		
RO1654	PO0076	Mrs L Sowler		
RO1655	PO0077	Mr J Sowler		
RO1656	PO0730, PO0861, PO0912, PO0968, PO1298, PO1391, PO1392	Mr S Spencer	Bericote Properties Limited	Mrs C Musker, Lichfields

RO1657	PO0194, PO0532, PO1235, PO2257, PO2258	Mrs K Spencer		
RO1658	PO0197, PO0534, PO1237, PO2261, PO2262	Miss R Spencer		
RO1659	PO0198, PO0535, PO1238, PO2263, PO2264	Miss H Spencer		
RO1660	PO0200, PO0537, PO1240, PO2267, PO2268	Mrs J Spencer		
RO1661	PO0209, PO0544, PO1248, PO2277, PO2278	Mr I Spencer		
RO1662		Mr A Spendlove		
RO1663	PO0826, PO2151	Mrs M Spensley		
RO1664	PO2003	Mrs E Stabler		
RO1665	PO2004	Mr M Stabler		
RO1666	PO3826	Mr M Stach-Kevitz		
RO1667	PO1433	Ms T Standish		
RO1668	PO2094, PO2124	Mr A Standish		
RO1669		Ms C Stanley		
RO1670	PO0275, PO1443, PO3987	Mrs C Sterry		
RO1671		Mr S Stewart		
RO1672		Mrs E Stewart		
RO1673	PO3110	Mrs V Stock		
RO1674	PO3119	Mr R Stock		
RO1675	PO0218, PO0559, PO1255, PO2312	Mr R Stock		
RO1676	PO3512, PO3513, PO3514, PO3515, PO3516, PO3720, PO3721, PO3722, PO3723, PO3724, PO3725, PO3726, PO3727, PO3728, PO3729, PO3730, PO3731, PO3732, PO3733, PO3734	Mr P Stokes	Kentucky Fried Chicken (Great Britain) Limited	Mr S Simms, SSA Planning Limited
RO1677	PO0745, PO1534, PO2474, PO3798	Mr M Stone	Bellway Homes Ltd. (Strategic Land Division)	Miss C Pegg, Cushman & Wakeman
RO1678	PO0527, PO0529, PO1234, PO2252, PO3158	Mr A Storey	JAK Fine Art Printing	
RO1679	PO1882, PO2881	Mr D Stott		
RO1680	PO1522	Miss S Stout		
RO1681	PO0327, PO0328, PO1630, PO2745	Mr E Studley		
RO1682	PO1629, PO2744	Mrs M Studley		
RO1683	PO2027	Mr Sumner		Mr Hodd
RO1684		Miss L Sumner		
RO1685		Ms S Sutton		
RO1686		Mrs S Sutton		
RO1687		Mr D Sutton		
RO1688	PO3055	Mr & Mrs D Swain	ECRA	
RO1689		Mrs N Swash		
RO1690		Mr P Swash		
RO1691	PO3352	Mr S Swiffen		
RO1692	PO0766, PO1812, PO3314, PO3530	Mrs S Swift		
RO1693	PO0765, PO1811, PO3313, PO3529	Mr M Swift		
RO1694	PO0768, PO1818, PO3316, PO3532	Mrs R Swift		
RO1695	PO3060	Mr & Mrs M Syder		
RO1696		Mr K Tabern		
RO1697		Mr S Tabern	Budgetcases	
RO1698		Mrs J Tarpey		

RO1699	PO0308, PO0732, PO1521, PO2637	Cllr J Tasker	Rainhill Ward Councillor	
RO1700	PO0323, PO2702	Ms T Taylor		
RO1701	PO1700	Mr L Taylor		
RO1702	PO1073, PO1712	Mr D Taylor		
RO1703	PO1951	Mrs M Taylor		
RO1704		Mr S Taylor		
RO1705		Mrs D Taylor		
RO1706		Miss S Taylor		
RO1707		Mr E Taylor		
RO1708		Mr P Taylor		
RO1709		Mrs J Taylor		
RO1710		Mrs R Taylor		
RO1711	PO0591, PO1268, PO2365	Mr P Telford		
RO1712		Mr J Tennant		
RO1713		Mr D Tennant		
RO1714		Mrs P Tennant		
RO1715		B Tennant		
RO1716	PO2984	Mr K Tet low		
RO1717		Miss N Tewson		
RO1718		Mr N Thomason		
RO1719	PO0010	Mrs B Thompson	Bold & Clock Face Action Group	
RO1720	PO0011	Mr R Thompson	Bold & Clock Face Action Group	
RO1721	PO0749, PO1541, PO3801	Mr A Thompson	Morris Homes North Ltd.	Mr P Williams, Mosaic Town Planning
RO1722	PO0369, PO0370, PO1058, PO1688	Mrs J Thompson		
RO1723	PO0083, PO1814	Mrs S Thompson		
RO1724		Ms A Thompson		
RO1725	PO2236	Mrs L Thompson		
RO1726	PO2243	Mr A Thompson		
RO1727		Mrs V Thornber		
RO1728	PO3134	Mr B Thornton		
RO1729	PO3135	Mrs J Thornton		
RO1730	PO3136	Mr S Thornton		
RO1731	PO2598	Mr D Thow		
RO1732	PO0716	Ms J Throw		
RO1733	PO1207	Mr E Thwaite	Lowton East Neighbourhood Development Forum	
RO1734	PO2789, PO3976	Mr M Tickle		
RO1735	PO1938, PO2909	Mr D Tinsley		
RO1736	PO2111	Mr J Tirebuck		
RO1737	PO1636, PO2752	Mrs C Titterington		
RO1738	PO2038, PO3003	Mr M Tomlinson		
RO1739		Mrs C Toomey		
RO1740	PO2873, PO2874	Mrs B Topping		
RO1741	PO0407, PO2876, PO2877	Mr P Topping		
RO1742		Miss J Tose		
RO1743	PO0073	Mr C Towner		
RO1744	PO0080	Mrs J Towner		
RO1745	PO1747	Mr A Tranter		
RO1746	PO2715	Mrs P Travis		
RO1747	PO1104, PO1807	Mr K Travis		
RO1748		Mrs L Travis		
RO1749		Mr F Travis		
RO1750		Mr B Travis		

RO1751	PO0256, PO0257, PO0258, PO0259, PO0260, PO0261, PO0974, PO0975, PO0976, PO1405, PO1406, PO2562	Mrs B Traynor		
RO1752	PO0271, PO0272, PO0984, PO1423, PO2586	Mr D Traynor		
RO1753	PO0273, PO0986, PO1425, PO2588	Mr L Traynor		
RO1754	PO1792	Mr G Traynor		
RO1755	PO1707	Mr L Trigg		
RO1756	PO1710	Mrs J Trigg		
RO1757	PO2065, PO3030	Mrs G Trotter		
RO1758		Ms J Tuddenham		
RO1759	PO0473, PO0474, PO2052, PO3022	Mr C Tully		
RO1760	PO1209	Mr & Mrs Tully		
RO1761	PO0650, PO0790, PO0950, PO1163, PO1363, PO1980, PO2519, PO2968, PO3333	Miss J Tunstall		
RO1762		Mrs E Turner		
RO1763		Mrs P Turner		
RO1764		Miss L Turner		
RO1765		Mr W Turner		
RO1766		Mr S Turner		
RO1767		Mrs G Turner		
RO1768		Mr P Turner		
RO1769		Mr W Turner		
RO1770	PO0307, PO1520, PO4020	J Turton		
RO1771	PO1221, PO2181	Mrs P Twiss		
RO1772	PO1222, PO2182	Mr M Twiss		
RO1773	PO0123	Mrs G Twist		
RO1774	PO0124	Mr J Twist		
RO1775	PO0125	Mrs A Twist		
RO1776	PO0126	Mr M Twist		
RO1777	PO0980, PO3476, PO3477, PO3478, PO3479, PO3480, PO3481, PO3482, PO3483, PO3484, PO3485	Mr D Tyas	Co-Chair PAG, Parkside Action Group	
RO1778		Mrs J Tyrer		
RO1779		Mr D Tyrer		
RO1780	PO0206, PO0543, PO1247, PO2274, PO3943	Ms C Tyrrell		
RO1781	PO1930, PO2902	Mr P Upton		
RO1782	PO1140, PO1931, PO2903, PO3846, PO3925	Mrs S Upton		
RO1783	PO0279, PO1452, PO3990	Mr & Mrs I Valentine		
RO1784	PO2220	Mr D Van Der Burg		
RO1785		Mrs J Varley		
RO1786	PO0174, PO0511, PO2211	Mrs S Vaudrey		
RO1787	PO0512, PO2212, PO3133	Mr J Vaudrey		
RO1788	PO0969, PO2490, PO3473, PO3592, PO3705	Ms V Vernon	Sport England	
RO1789	PO3159	Dr S Vinjamuri		
RO1790	PO0045, PO1585	Mr & Mrs Wagstaff		
RO1791	PO0263, PO0688, PO2567, PO2568	Mrs I Wainwright		
RO1792	PO0264, PO0689, PO2569, PO2570	Mr D Wainwright		
RO1793	PO0270, PO0690, PO2575, PO2576	Miss D Wainwright		

RO1794	PO1656, PO1742, PO2764	Mr D Wainwright		
RO1795	PO1755, PO2791	Mrs S Wainwright		
RO1796	PO3215	Mr D Wainwright		
RO1797		Mr K Waldron		
RO1798		Mrs S Waldron		
RO1799	PO1486	Ms G Walker		
RO1800	PO1569, PO4029	Mr J Walker		
RO1801	PO1911	Mrs S Walker		
RO1802	PO1912	Mr D Walker		
RO1803		Miss L Walker		
RO1804	PO0750, PO1544, PO2478, PO2649, PO3802	Mr S Waller	The Knowsley Estate	Miss C Pegg, Cushman & Wakefield
RO1805	PO0057	Mrs F Waller		
RO1806		Mrs M Walsh		
RO1807		Mr J Walsh		
RO1808	PO2283	Mrs G Walsh		
RO1809	PO0693, PO0981, PO0982, PO1337, PO3486, PO3487, PO3488, PO3489, PO3490, PO3491, PO3492, PO3493, PO3494, PO3496, PO3601, PO3620, PO3621, PO3626, PO3627, PO3628, PO3638, PO3639, PO3647, PO3716, PO3719, PO3749	Mr R Ward	Parkside Action Group, Local People, Battlefields Trust, Open Spaces Society	
RO1810		Miss C Ward		
RO1811	PO3834	Mr A Warren		
RO1812		Ms D Watkin		
RO1813	PO1741	Mr J Watkinson		
RO1814	PO0703, PO2594	Ms L Watson		
RO1815	PO0707, PO3292	Mr D Watson		
RO1816	PO2935	Mr & Mrs S Watts		
RO1817	PO1743	Mrs E Webb		
RO1818	PO1744	Mr D Webb		
RO1819	PO2814	Mrs S Webb		
RO1820	PO1503	Mr S Webster		
RO1821	PO1504	Mrs G Webster		
RO1822	PO1506	Ms E Webster		
RO1823	PO1507	Ms E Webster		
RO1824	PO0319, PO1583, PO4033	Mr A Webster		
RO1825	PO2372, PO3781	Mr P Webster		
RO1826	PO2210	Miss D Weeks		
RO1827		Mr P Welsh		
RO1828	PO0821, PO2131	K Wesley		
RO1829	PO1600, PO2684	Mr & Mrs J Weston		
RO1830	PO1402	Mr T Whiswall		Mr P Johnson, Frank Marshall and
RO1831	PO1119, PO1860	Miss D White		
RO1832	PO0774	Mrs B White		
RO1833		Ms M White		
RO1834		Mr G White		
RO1835		Mr L White		
RO1836		Mr G White		
RO1837		Mrs M White		
RO1838	PO2140	Mrs M White	The Shining Lights Heritage Group	
RO1839	PO0169, PO2204	Mrs S White		
RO1840		Mr G White		
RO1841	PO0771	Mrs K Whiteside		

RO1842	PO0195	Mrs V Whiteside		
RO1843		Ms L Whitfield		
RO1844		Mr & Mrs G Whittingham		
RO1845	PO1055, PO1682	Mrs P Whittle		
RO1846	PO1089, PO1738	Mr D Whittle		
RO1847	PO1614	Mrs C Wilcock		
RO1848	PO0181, PO0516, PO0839, PO0904, PO1331, PO1385, PO1386	Miss J Wilcock		
RO1849	PO0289, PO1483, PO4004	Ms G Wilding		
RO1850	PO2667	Mrs G Wilding		
RO1851	PO3139	Mrs S Wilkie		
RO1852	PO0647, PO0787, PO0947, PO1160, PO1360, PO1975, PO2516, PO2965, PO3330	Mrs K Wilkinson		
RO1853	PO1434, PO3961	Mr J Williams		
RO1854	PO0930	Mr & Mrs S & A Williams		
RO1855	PO2708	Mrs A Williams		
RO1856	PO2720	Mrs G Williams		
RO1857	PO1671, PO2782	Mrs J Williams		
RO1858	PO2945	Mr P Williams		
RO1859		Miss B Williams		
RO1860		Mrs J Williams		
RO1861		Ms S Williams		
RO1862		Miss J Williams		
RO1863		Mr C Williams		
RO1864	PO0881, PO0884, PO0894, PO0909, PO2455, PO3081	Mr F Williams	St.Helens Green Party	
RO1865	PO3109	Mrs J Williams		
RO1866	PO3200	Mr W Williams		
RO1867	PO2335, PO3201, PO3210	Mrs J Williams		
RO1868	PO2334, PO3209	Mr G Williams		
RO1869	PO2340	Mrs C Williams		
RO1870	PO3103	Mr W Williams		
RO1871	PO0226, PO0568, PO2325	Mr P Williams		
RO1872	PO0229, PO0569, PO2327, PO3951	Mrs A Williams		
RO1873	PO0235, PO2360	Mr R Williams		
RO1874		Mr S Williamson		
RO1875	PO0466, PO0467, PO2049, PO3018	Mrs S Willis		
RO1876		Mrs S Willis		
RO1877	PO1046, PO2724	Mr P Wilson		
RO1878	PO1109, PO1851, PO1852, PO2849, PO2850	Mr A Wilson		
RO1879	PO0094	Mr W Wilson		
RO1880	PO0095	Mrs M Wilson		
RO1881	PO1195, PO2995	Mr B Wilson		
RO1882	PO0481, PO0482, PO2057, PO3026	Mrs C Wilson		
RO1883	PO0816	Miss J Wilson		
RO1884	PO0589, PO0590, PO1267, PO3229	Mrs V Wilson		
RO1885		Mrs G Windever		
RO1886		Miss A Windever		
RO1887	PO1699	Mr K Windle		
RO1888	PO3265	Mr N Winstanley		
RO1889	PO3268	Mrs C Winstanley		
RO1890	PO2037, PO3002	Mr G Winstanley		
RO1891	PO0291, PO1488	Ms JP Wisedale		

RO1892	PO0477, PO0478, PO2054, PO3024	Mrs L Wiswell		
RO1893	PO1939, PO2910	F Witherington		
RO1894	PO0353, PO1644, PO2740	Mr S Withington		
RO1895	PO0343, PO0352, PO1643, PO2754	Mrs O Withington		
RO1896	PO3777	Mr T Witter		
RO1897	PO0464, PO0465, PO2047, PO3016	Mr S Wolstenholme		
RO1898	PO2048, PO3017	Mrs H Wolstenholme		
RO1899	PO2705	Mrs R Wood		
RO1900	PO2799	Miss A Wood		
RO1901	PO3287	Mrs A Wood		
RO1902	PO3288	Mr J Wood		
RO1903	PO1581	Miss M Woodruff		
RO1904	PO1582	Mr R Woodruff		
RO1905	PO1681, PO2777	Mr M Woodruff		
RO1906	PO1735, PO2784	Mrs D Woodruff		
RO1907	PO2815	Mrs B Woods		
RO1908	PO3317	Mr D Woods		
RO1909		Mrs J Woods		
RO1910		Miss C Woods		
RO1911	PO1078, PO1716	Mr K Woodward		
RO1912	PO0389, PO0390, PO1083, PO1721	Mrs J Woodward		
RO1913		Mrs A Woodward		
RO1914	PO3070	Mr B Woodward		
RO1915	PO3071	Ms P Woodward		
RO1916	PO1828, PO2823	Mrs B Worall		
RO1917	PO0119, PO0457, PO0806, PO1191, PO3416, PO3955	Mrs B Worrall		
RO1918	PO0287, PO1479, PO4002	Mr J Worsley		
RO1919	PO0288, PO1482, PO4003	Ms M Worsley		
RO1920	PO0303, PO1515, PO4016	S Wright		
RO1921	PO0304, PO1516, PO4017	H Wright		
RO1922	PO0305, PO1517, PO4018	L Wright		
RO1923	PO0306, PO1518, PO4019	H Wright		
RO1924		S Wright		
RO1925	PO1816	Miss A Wright		
RO1926		Mr D Wright		
RO1927		Mrs K Wright		
RO1928	PO0761	Mr S Wright		
RO1929	PO0762	Mrs M Wright		
RO1930		Mrs S Wright		
RO1931		Mr G Wright		
RO1932	PO1617	Mr E Wynne		
RO1933	PO0331, PO0366, PO1654, PO2747	Mr G Yates		
RO1934	PO0332, PO0333, PO1632, PO2748	Mr B Yates		
RO1935	PO0334, PO0335, PO1633, PO2749	Mrs C Yates		
RO1936		Mrs V Yates		
RO1937	PO2229, PO3144	Mr R Yates		
RO1938	PO1802	Mr C Yeates		
RO1939	PO1217, PO2174	Mr P Young		
RO1940	PO0684, PO0898, PO0910, PO1334, PO3474, PO3748		Parkside Regeneration LLP	Ms J Ray, Spawforths
RO1941	PO0242		Jockey Club Racecourses Limited	Mr N Jones, Rapleys
RO1942	PO0978, PO3517		Network Space Developments	Ms J Ray, Spawforths

RO1943	PO2584, PO3614, PO3615		Metacre Ltd	Miss J Beardsall, De Pol Associates
RO1944	PO0696, PO0697, PO0885, PO0900, PO0914, PO0915, PO1272, PO1390, PO2375, PO2376, PO2391, PO2394, PO2405, PO2406, PO2449, PO2543, PO2545, PO2548, PO2550, PO3389, PO3399, PO3400, PO3536, PO3544, PO3556, PO3560, PO3561, PO3585, PO3630, PO3631, PO3666, PO3688, PO3691, PO3698, PO3706, PO3742, PO3743		Barratt Homes	Miss H Payne, Indigo Planning Ltd
RO1945	PO0987, PO3868		Worthington Land Settlement	Mr P Johnson, Frank Marshall & Co.
RO1946	PO0597, PO0702, PO1426, PO3789		Jockey Club Racecourses Limited,	Mr A Windress, ID Planning
RO1947	PO3511		McDonald's Restaurants Ltd.	Mr B Fox, Planware Ltd.
RO1948	PO0713, PO1456, PO2395, PO2493, PO3522, PO3563, PO3663, PO3709, PO3993		Harworth Estates Ltd.	Miss A Fitton, Turley
RO1949	PO0998, PO1297, PO3751, PO3755, PO3994		English Land Ltd.	Mr A Frost, Frost Planning
RO1950	PO1001, PO1340		Omega Warrington Ltd.	Mr C Gardener, Progress Planning Consultancy
RO1951	PO2386, PO2454, PO2470, PO3540, PO3551, PO3570, PO3571, PO3862		Redrow Homes	G Trehwella, Cass Associates
RO1952	PO0631, PO0632, PO0739, PO0740, PO0741, PO0742, PO1526, PO1527, PO1528, PO2417, PO2418, PO2419, PO2642, PO3274, PO3443, PO3552, PO3581, PO3861		Church Commissioners for England	A Kennedy, Deloitte LLP
RO1953	PO0038, PO0595, PO0596, PO0743, PO0744, PO0864, PO0886, PO0893, PO0897, PO0924, PO0925, PO1274, PO1299, PO2387, PO2388, PO2389, PO2420, PO2437, PO2445, PO2471, PO2472, PO2473, PO2544, PO2547, PO2549, PO2551, PO2553, PO2643, PO3242, PO3295, PO3363, PO3391, PO3412, PO3541, PO3553, PO3572, PO3582, PO3629, PO3633, PO3664, PO3682, PO3693, PO3699, PO3704, PO3707, PO3753		Murphy Group	Miss E Cunningham, Indigo Planning
RO1954	PO1535, PO2475, PO2644, PO3865, PO3884, PO4048		Story Homes	Ms H Hartley, Nexus Planning
RO1955	PO0747, PO1022, PO1538, PO2476, PO2648, PO3736, PO3800, PO3886, PO3967		Jones Homes (North West) Ltd.	Mr V Ryan, Barton Willmore

RO1956	PO0602, PO0608, PO0748, PO0927, PO1023, PO3593		Revelan Developments Ltd.	Mr J Pearce, Harris Lamb Planning Consultancy
RO1957	PO1542, PO2477		Consortium comprising Story Homes, Wainhomes and Eccleston Homes	Ms H Hartley, Nexus Planning
RO1958	PO1545, PO2421, PO2499, PO2650, PO3803		Muller Property Group	Mr M Krassowski, Walsingham Planning
RO1959	PO1024, PO1025, PO1026, PO1027, PO1028, PO1546, PO1547, PO1548, PO1549, PO1550, PO1551, PO1552, PO1553, PO1554, PO1555, PO1556, PO1557, PO1558, PO2651, PO2652, PO2653, PO2654, PO3757, PO3758, PO3759, PO3760, PO3761, PO3762, PO3763, PO3764, PO3765, PO3766, PO3767, PO3768, PO3769, PO3770, PO3771, PO3772, PO3804, PO3805, PO4025		Peel Holdings (Land and Property) Ltd	Mr A Bickerdike, Turley
RO1960	PO0040, PO1559, PO1560, PO1561, PO1562, PO2479, PO2500, PO2655, PO2656, PO2657, PO3535, PO3543, PO3555, PO3575, PO3665, PO3806, PO3807, PO3808		Wainhomes North West Ltd.	Mr N Scott, Emery Planning
RO1961	PO0041, PO0316, PO0751, PO0901, PO1030, PO1326, PO1570, PO2660, PO3809, PO3810, PO3811, PO3812, PO3813, PO3814		St. Helens Green Belt Association	Mr M Wellock, Kirkwells
RO1962	PO0753, PO0929, PO1033, PO1344, PO3746		Canmoor Developments	Mr M Thomas, Michael Sparks Associates
RO1963	PO3504		iSec	Mr R Brown
RO1964	PO1574, PO2487, PO2663, PO3815		Seddon Construction Limited	Mr P Nellist, CBRE Ltd.
RO1965	PO1035, PO1345, PO2664		DB Symmetry Management	Mr M Grant, Lichfields
RO1966	PO1346		Pier (UK) Ltd	A Burns, Emery Planning
RO1967	PO0616, PO0619, PO0757, PO0875, PO0879, PO0932, PO1040, PO1589, PO2402, PO2439, PO2482, PO2502, PO2676, PO3367, PO3393, PO3526, PO3577, PO3588, PO3636, PO3670, PO3695, PO3702, PO3713, PO3738, PO3820, PO4049	Redrow Homes (North West)	Mr G Lamb, Pegasus Group	

RO1968	PO0617, PO0620, PO0758, PO0876, PO0880, PO0933, PO1041, PO1590, PO2403, PO2440, PO2483, PO2503, PO2677, PO3368, PO3394, PO3527, PO3578, PO3589, PO3637, PO3671, PO3696, PO3703, PO3714, PO3739, PO3821, PO4050	Wallace Land Investments	Mr S Tibenham, Pegasus Group	Mr S Tibenham
RO1969		Ms B Bradley		
RO1970		Ms J Adamson		
RO1971		J Appleton		
RO1972		Mr J Parsons		
RO1973		N Rimmer		
RO1974		Dr S Ashton		
RO1975		Ms M Jenner		
RO1976		Ms L Cottom		
RO1977		Mr M Richardson		
RO1978		Ms A Parsons		
RO1979		C Parsons		
RO1980		Mr F Johnson		
RO1981		Mrs V Twiss		
RO1982		Mr & Mrs B Duffin		
RO1983		Mr R Mukherjee		
RO1984		Dr A Dutta		
RO1985		Mr J Carroll		
RO1986		Ms P Price		
RO1987		Mr D Smith		
RO1988		Mr S Glover		
RO1989		Mr & Mrs A Lawler		
RO1990		Mr M Richardson		
RO1991		No name provided		

APPENDIX 19: ST HELENS COUNCIL AND THE PLANNING INSPECTORATE JOINT STATEMENT PUBLISHED IN OCTOBER 2019

Following concerns about the processing of personal data on the proposed St Helen's Local Plan (the plan) and examination of it, this statement has been jointly agreed by the Planning Inspectorate (the Inspectorate) and St Helen's Council (the Council) to aid transparency and accountability.

The Inspectorate and the Council (we) recognise that we are independent data controllers with regard to our respective processing of personal data on the plan and examination of it. Each party recognises our own, separate, data controller responsibilities for our processing of personal data in respect of the proposed local plan and Examination. We also recognise that the Information Commissioners Office are the regulator of this activity.

We recognise that our respective processing of information (including the personal data within it) is underpinned by statute. This includes the Planning & Compulsory Purchase Act 2004 and The Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provided opportunity for representations to made to the Council in respect of the plan. Regulation 22 places obligations on the Council to submit those representations to the appointed inspector for the purpose of the examination; it also requires the Council to make those representations available, as soon as reasonably practicable, in accordance with Regulation 35.

As the data controller St Helens council is responsible for ensuring that all parties who engage with the process are adequately informed on the processing of their personal data. Councils should ensure that individuals who object to provision of their personal data are made aware of the impact of not supplying that data to the Inspectorate. If representation is sent to the Inspectorate and made available in anonymous form this may affect the weight the Inspector is able to provide to the representation; and their ability to invite persons to hearing sessions.

In terms of the Council's Regulation 35 requirements in the interest of natural justice the Inspectorate expects the inspector and public to have access to the same information. The council as the data controller has sole responsibility in determining for the processing of any personal data they hold or collect under their statutory duty.

Following concerns about the processing of personal data on the proposed St Helen's Local Plan (the plan) and examination of it, this statement has been jointly agreed by the Planning Inspectorate (the Inspectorate) and St Helen's Council (the Council) to aid transparency and accountability.

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APPENDIX 20: SUMMARY TABLE OF THE NUMBER OF REPRESENTATIONS ATTRIBUTED TO EACH SECTION OF THE PLAN AND PROPOSED DEVELOPMENT SITES

St. Helens Borough Local Plan Submission Draft – Number of Representations received by part of Plan, including number of objections received on grounds of soundness

Policy/ Part of Plan	Total	Objection	Support	Neither	Soundness				
					Not Sound	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
General Comments on the overall Plan	241	236	2	3	206	125	197	173	166
Chapter 1									
General Comments	7	7	0	0	6	5	5	5	3
Paragraph 1.7.2 – Duty to Cooperate & Statement of Common Ground	324	322	2	0	295	156	288	280	257
Chapter 2									
Table 2.1	1	1	0	0	1	0	1	1	1
Chapter 3									
General Comments	2	2	0	0	2	2	2	2	2
Spatial Vision	7	2	6	0	2	2	2	2	2
Strategic Aims & Objectives	17	12	5	0	12	4	3	3	3
Chapter 4									
General Comments	2	2	0	0	1	0	1	1	0
Policy LPA01	61	57	4	0	55	8	54	52	53
Policy LPA02	224	199	24	1	182	74	165	156	153
Figure 4.1: Key Settlements Plan	2	2	0	0	2	0	0	0	2
Figure 4.2: Key Diagram	3	2	1	0	4	0	0	1	1
Policy LPA03	59	45	12	2	43	8	43	19	17

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Policy/ Part of Plan	Total	Objection	Support	Neither	Soundness				
					Not Sound	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Policy LPA04	352	338	8	6	304	168	190	276	272
Table 4.1: Allocations for Employment Development	9	8	1	0	6	2	5	5	3
Table 4.2: St. Helens Borough Estimated Employment Land Needs 2012-2037	2	1	1	0	1	0	0	0	0
Policy LPA04.1	63	53	9	1	55	8	49	49	49
Policy LPA05	1040	1017	15	8	898	527	842	804	756
Table 4.5: Sites Allocated for new Housing Development	23	19	4	0	14	5	10	8	6
Table 4.6: Housing land requirements and supply – 2016 until 2035	27	27	0	0	25	14	20	20	21
Table 4.7: Safeguarded Land for Employment	2	2	0	0	1	0	0	0	0
Figure 4.3: Housing Trajectory	1	1	0	0	1	1	1	1	1
Policy LPA05.1	64	58	4	2	55	13	50	48	46
Policy LPA06	701	686	8	7	607	247	594	570	530
Table 4.7: Safeguarded Land for Employment	20	18	2	0	18	4	15	16	16
Table 4.8: Safeguarded Land for Housing	27	27	0	0	26	12	24	23	18
Policy LPA07	97	90	5	2	84	23	83	72	74
Policy LPA08	60	58	1	1	54	21	48	48	50
Policy LPA09	15	11	4	0	11	4	11	9	10
Policy LPA10	32	30	0	2	30	30	31	29	31
Policy LPA11	11	11	0	0	9	5	10	8	8
Chapter 5									

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Policy/ Part of Plan	Total	Objection	Support	Neither	Soundness				
					Not Sound	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Policy LPB01	3	1	2	0	0	0	0	0	0
Chapter 6									
Policy LPC01	40	40	0	0	29	9	22	12	22
Policy LPC02	25	20	5	0	19	14	10	10	10
Policy LPC04	5	2	3	0	3	0	2	2	2
Chapter 7									
Policy LPC05	8	5	2	1	5	4	7	4	5
Policy LPC06	12	11	1	0	9	3	7	9	7
Policy LPC07	1	1	0	0	1	1	1	1	1
Figure 7.2: Potential New Greenway Routes	1	1	0	0	0	0	0	0	0
Policy LPC08	6	6	0	0	6	1	6	5	5
Policy LPC09	6	4	2	0	3	3	3	3	3
Policy LPC10	12	10	2	0	10	8	8	7	7
Policy LPC11	9	3	4	2	3	2	2	2	3
Policy LPC12	15	10	2	3	8	3	7	7	8
Policy LPC13	10	8	2	0	8	5	4	3	3
Policy LPC14	5	3	2	0	0	0	0	0	0
Chapter 8									
Policy LPD01	10	10	3	0	7	3	7	7	7
Policy LPD02	8	4	2	2	2	1	1	1	1
Policy LPD03	8	3	3	2	3	2	2	2	2
Policy LPD06	3	3	0	0	2	2	2	2	2
Policy LPD07	7	7	0	0	7	5	3	3	2
Policy LPD09	3	3	0	0	2	1	1	2	1
Policy LPD10	16	16	0	0	16	16	16	16	16
Appendices									

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

Policy/ Part of Plan	Total	Objection	Support	Neither	Soundness				
					Not Sound	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Appendix 2	1	1	0	0	1	0	0	0	0
Appendix 4	4	4	0	0	4	2	3	3	0
Appendix 5	12	9	2	1	7	2	4	5	2
Appendix 7	3	0	1	2	1	1	1	1	1
Miscellaneous									
Omission of Policy	4	3	0	1	3	1	1	1	2

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

St. Helens Borough Local Plan Submission Draft – Number of Representors objecting or supporting a specific site proposed as an allocation or safeguarded site in the Plan

Site Allocations (representations relating to a site but not a specific policy have been apportioned to either Policy LPA04, LPA05 or LPA06)	Total	Objecting	Supporting	Neither
Proposed Sites Allocated for Employment				
1EA – Omega South Western Extension, Land north of Finches Plantation, Bold	10	6	4	0
2EA – Florida Farm North, Slag Lane, Haydock	136	133	3	0
3EA – Land North of Penny Lane, Haydock	1	1	0	0
4EA – Land South of Penny Lane, Haydock	8	7	1	0
5EA – Land to the West of Haydock Industrial Estate, Haydock	140	138	2	0
6EA - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley	143	141	2	0
7EA - Parkside East, Newton-le-Willows	20	18	1	1
8EA - Parkside West, Newton-le-Willows	24	18	4	2
9EA – Land to the West of Sandwash Close, Rainford	9	8	1	0
10EA – Land at Lea Green Farm West, Thatto Heath	1	1	0	0
11EA – Gerards Park, College Street, St. Helens Town Centre	0	0	0	0
Proposed Sites Allocated for Housing				
1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood	249	247	2	0
2HA – Land at Florida Farm (South of A580), Slag Lane, Blackbrook	167	166	1	0
3HA – Former Penlake Industrial Estate, Regional Road, Bold	12	12	0	0
4HA – Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	58⁹	51	4	3
5HA – Land South of Gartons Land and former St. Theresa's Social Club, Garton's Lane, Bold	35	34	0	1
6HA – Land East of City Road, Cowley Hill, Town Centre	4	3	0	1
7HA – Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows	1	1	0	0
8HA – Land South of Higher Lane and East of Rookery Lane, Rainford	189	187	2	0

⁹ A number of Part A forms (in excess of 400) were submitted but with no reference to a particular site, however Bold and Clockface Action Group claim their submission included 400+ Part A forms.

ST HELENS BOROUGH LOCAL PLAN 2020-2035
CONSULTATION STATEMENT (MARCH 2020)

9HA – Former Linkway Distribution Park, Elton Head Road, Thatto Heath	2	2	0	0
10HA – Moss Nook Urban Village, Watery Lane, Moss Nook	1	0	1	0
Proposed Sites Safeguarded for future Employment allocations – beyond the Plan period				
1ES – Omega North Western Extension, Bold	5	3	0	2
2ES – Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock	42	41	0	1
Proposed Sites Safeguarded for future Housing allocations – beyond the Plan period				
1HS – Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	218	217	1	0
2HS – Land between Vista Road and Belvedere Road, Earlestown	4	2	1	1
3HS – Former Eccleston Park Golf Club, Rainhill Road, Eccleston	175 ¹⁰	171	1	3
4HS – Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	5	3	1	1
5HS – Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows	2	2	0	0
6HS – Land East of Chapel Lane and South of Walkers Lane, Sutton Manor	9	8	1	0
7HS – Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath	6	6	0	0
8HS – Land south of A580 between Houghtons Lane and Crantock Grove, Windle	227	223	1	3

¹⁰ 28 out of the 34 petitions submitted, were submitted by those objecting to the designation of 3HS as a proposed safeguarded site for future housing needs.

**APPENDIX 21: KEPPIE MASSIE'S RESPONSE TO
COMMENTS SUBMITTED BY GRASSCROFT
SOLUTIONS LTD. (REF: RO1154)**

RESPONSE NOTE

GRASSCROFT SOLUTIONS LTD (GDS)

ST HELENS LOCAL PLAN

ECONOMIC VIABILITY ASSESSMENT

JUNE | 2020

1.0 INTRODUCTION

- 1.1 We have prepared this structured response note with reference to the comments made by Grasscroft Development Solutions (GDS) in the document titled “Comments on Keppie Massie Economic Viability Assessment of December 2018” dated March 2019. We understand that these comments have been submitted by GDS on behalf of their client Taylor Wimpey.
- 1.2 This response note is structured to reflect the main themes raised by GDS and as appropriate addresses the following aspects:

Section 2 – Methodology

Section 3 – Evidence, Analysis and Appraisal Assumptions

Section 4 - Conclusions

- 1.3 In support of our comments we have also attached the following appendices:

Appendix 1 – Briefing Note Database and Construction Cost Assessment

- 1.4 For ease of reference we have abbreviated the following:

Grasscroft Development Solutions – “GDS”

GDS response - “GR”

The Local Plan Economic Viability Assessment – “EVA”

Report of Construction Costs – “RCC”

2.0 METHODOLOGY

Evidence Base and Presentation of Viability Results

- 2.1 GDS request provision of appraisals summaries. For a Local Plan Viability Assessment such as this we normally prepare many hundreds of financial appraisals. Given the sheer volume of this information we do not normally provide this as an appendix to the report as this would run to many pages. A selection of the appraisals can be provided to assist and elsewhere we have provided summaries of a sample of base appraisals for review.

Testing Viability at the Plan Making Stage

- 2.2 The comments are noted however the reference to the buffer adopted at the Cheshire East CIL examination is incorrect. The testing undertaken by Keppie Massie was in fact inclusive of plan policies and therefore the remaining 50% of the surplus was the sum attributable to CIL only.

Guidance on Key Appraisal Assumptions

- 2.3 The reference at the top of p8 is incorrect. GDS state that "*At present abnormal costs have been specifically excluded from KM's total cost assessments.*" This is not correct and further details relating to the approach to abnormal costs is contained at paras 2.31 to 2.38 of the RCC at Appendix 5 of the EVA. For the allocations tested abnormal costs are included, with the assessment of these costs based on known information at the time of preparation of the EVA which is a reasonable approach. The construction costs for the generic brownfield sites include an allowance for additional site clearance and for some degree of abnormal foundations. An allowance based on a further 5% of development construction costs is then included as an input to the appraisal itself to allow for the likelihood that remediation may be required. For greenfield sites site opening up costs have been included to address offsite abnormal development works. Obviously the PPG is quite clear that these abnormal costs should be taken into account when defining benchmark land value
- 2.4 GDS then comment about site opening up costs and professional fees for larger sites. These matters are addressed later in this response at paras 3.38–3.41 and paras 3.42–3.44 respectively.

3.0 EVIDENCE, ANALYSIS AND APPRAISAL ASSUMPTIONS

Development Mix and Density

- 3.1 The housing mix adopted is in line with the SHMA and no adjustment is made to the mix when completing the appraisals at 30, 35 and 40 dwellings per hectare. As the mix contains a relatively high proportion of smaller dwellings, then at lower densities the site coverage is below the evidence of site coverage from other developments. At higher densities the mix gives rise to a reasonable site coverage which is consistent with the evidence. As noted in para 3.18 below, contrary to the argument being made by GDS it is actually the mix at lower densities that needs to be adjusted to achieve a more efficient and viable site coverage. The SHMA mix adopted for this lower density testing has the effect of understating the viability of these sites.

Dwelling Sizes/Site Ratios/Densities

- 3.2 GDS state that “It is not clear how recent applications have been analysed”. The detailed analysis is contained at Appendix 1 of the EVA and includes details of the average dwelling sizes, mix, site areas, gross to net ratios and density.
- 3.3 GDS question the inclusion of a 1 bed house type. The inclusion of this form of dwelling is based on the SHMA requirements, and the testing assumes that any 1 bed dwellings will be for affordable housing only. Therefore in line with the evidence noted by GDS in the planning application analysis and their recommendation, we have not included any 1 bed dwellings for market housing provision in the housing mix tested.
- 3.4 GDS suggest the approach to dwelling sizes is too simplistic and to adopt a single average dwelling size for the house types is too “broad brush”. The guidance recommends a proportionate assessment of viability and inevitably schemes will come forward with smaller and larger houses and at higher and lower densities than those tested. In the context of the testing that is undertaken it would be impractical to consider every eventuality both in terms of dwelling size and density. In preparing the EVA we have endeavoured to settle on a reasonable typical basis for testing based on the evidence from schemes being delivered in the Borough.
- 3.5 GDS question the relevance of the apartment sizes contained in table 3.11. These are relevant because as noted in para 3.29 and 3.39 and with reference to the results tables 6.16 – 6.18 we have prepared viability testing of standalone apartment developments.

- 3.6 GDS query the proportions of 4 and 5 bed dwellings. As noted in para 3.38 of the EVA, based on the SHMA housing mix, the mix tested varies slightly dependent on the level of affordable housing included in the particular assessment. This is illustrated with reference to the allocation construction cost assessments at Appendix 5. For those schemes inclusive of 30% affordable housing ie. 1HA, the mix is 11% 4 bed and 5% 5 bed. For those schemes tested with no affordable provision ie 6HA the mix is 15% 4 bed and 5% 5 bed.
- 3.7 GDS also state that it is impossible to calculate the actual development density being proposed (site coverage) in terms of total sq.ft per acre. GDS do not need to undertake this calculation as the information is already contained in the EVA. For the generic testing the sq.ft per acre (site coverage) for each scheme is contained in the results tables at 6.1 – 6.15 and for the allocations is contained at Appendix 6 of the EVA. As noted in the EVA the majority of the testing undertaken at 30 and 35 dph has been undertaken at a site coverage significantly below the optimum level which has the impact of reducing viability.
- 3.8 GDS make reference to the average dwelling sizes adopted in the assessment. The average sizes for the 4 and 5 beds are considered to be reasonably representative whilst the sizes adopted for some of the other dwelling types are considered to be high. The EVA is based on average sizes and particularly in relation to the 3 bed unit this will include not only semi-detached but also larger detached houses. The assumptions take into consideration the analysis of previous planning applications undertaken both in relation to the current EVA and earlier draft versions.
- 3.9 GDS again make reference to the significance of the density of development in terms of sq.ft per acre in terms of reaching what they consider to be a suitably realistic and cautious view on viability. They state that without access to actual copies of the development appraisals it is not possible for them to reach a firm conclusion on the appropriateness of the densities appraised. Again as noted above GDS appear to have missed the fact that that site coverage/density in terms of sq.ft per acre is provided for each appraisal in the results tables at 6.1 – 6.15 and for the allocations at Appendix 6 of the EVA. This information is clearly sufficient for them to be able to reach a firm conclusion on the sq.ft per acre.

- 3.10 GDS go on to say that from previous analysis they have carried out elsewhere densities of between 11,500 to 13,000 sq.ft per acre (2,640 to 2,985m² per hectare) would represent a suitably conservative range of assumptions for development density for a typical 2 storey housing only development. No evidence is provided by GDS to support this comment and we are not therefore able to verify this statement. As noted within the EVA our own view is that a developer will typically be seeking to achieve 13,000 – 14,500 sq.ft per acre in terms of a normal site coverage. Table 4.7 of the EVA contains details of new build sales. With reference to the schemes listed and based on available information we have been able to obtain the floor area and site area information necessary to calculate site coverage for 7 of the developments. The respective data is contained in table 3.1.

	Coverage (sq.ft per acre)	Coverage (sq.m per ha)	Density
Hamelin Park	12,552	2,880	39
Beech Gardens	13,067	2,998	35
Radley Park	13,448	3,092	37
The Willows	14,186	3,255	39
Stephenson Grove	15,551	3,576	39
Victoria Gardens	16,152	3,706	42
Vulcan Park	16,695	3,831	45
Average	14,522	3,334	39

Table 3.1: New Build Schemes Site Coverage/Density

- 3.11 The analysis shows site coverage ranging from 12,552 sq.ft up to 16,695 sq.ft per acre and the densities from 35 up to 45 per new developable acre. All of the schemes listed, save for Hamelin Park have a site coverage which exceeds the range suggested by GDS at 11,500 to 13,000 sq.ft per acre (2,640 to 2,985m² per hectare).
- 3.12 In the EVA prepared for Cheshire East CIL and referred to by GDS earlier in their comments, we analysed a number of greenfield and brownfield development sites to assess the average site coverage and density. For the brownfield sites our analysis of the new build housing schemes showed an average site coverage of 15,304 sq.ft per acre and an average density of 37 dwelling per hectare. For the greenfield sites the respective figures were 13,828 sq.ft per acre for site coverage and 33 dwellings per hectare for density. The overall average was 14,443 sq.ft and 35 dwellings per hectare. The viability testing contained in that EVA was based on an average site coverage of 14,100 sq.ft per acre and this was found to be reasonable by the Inspector.

- 3.13 The statement made by GDS that from previous analysis they have carried out elsewhere densities of between 11,500 to 13,000 sq.ft per acre (2,640 to 2,985m² per hectare) would represent a suitably conservative range of assumptions for development density for a typical 2 storey housing only development, is not supported by with evidence that we have and unfortunately GDS have not provided any evidence to support their findings. The majority of schemes listed in table 3.1, have site coverage which exceed this range, albeit we accept that a number do include an element of 2.5 storey houses. On the basis of the available evidence the statement made by GDS appears overly cautious and the lower range of site coverage that they suggest will have a limiting effect on viability.
- 3.14 Coincidentally, the combination of the housing mix and dwelling sizes that have been adopted for the viability testing in the EVA, results in a site coverage that is in line with the comments made by GDS. Excluding the 5 and 10 unit typologies, then the testing undertaken at 30 dwellings per hectare, with no affordable housing results in site coverage ranging from 11,288 to 11,413 sq.ft per acre. With affordable housing the range reduces to 10,924 to 11,034 sq.ft per acre.
- 3.15 At 35 dwellings per hectare, the respective ranges with no affordable housing are 13,169 to 13,315 sq.ft per acre and with affordable housing this reduces to 12,745 to 12,873 sq.ft per acre. All close to (some lower and some slightly higher) or within the range suggested by GDS.
- 3.16 For the more limited testing undertaken in Zone 1 and 2 at 40 dwellings per hectare, the site coverage increases to around 15,000 sq.ft per acre reflecting the higher density site coverages for Stephenson Grove, Vulcan Park and Radley Gardens contained at table 3.1.
- 3.17 Appendix 6 of the EVA contains details of the site coverages for the allocations have been tested. Save for 9HA and 10HA which are higher density schemes, the other 7 allocations have been tested based on site coverages ranging from 10,937 sq.ft up to 12,765 sq.ft. At these levels the site coverage is within or in fact lower than the range suggested by GDS. This clearly represents a very cautious approach to the testing here, and undoubtedly the site coverage assumed has a limiting impact on viability. 9HA and 10HA, reflecting the higher density form of development have been tested at 14,345 and 15,212 sq.ft per acre.

- 3.18 We have considered the final GDS paragraph under this heading regarding the need for a much higher proportion of smaller terraced or semidetached properties at densities of 40 dwellings per hectare. It is clear that given the proportion of smaller 1 and 2 bedroom houses contained in the housing mix that has been adopted, then at 40 dwellings per hectare this mix fits well on the sites tested and is line with the site coverages for higher density schemes at table 3.1. In fact the issue here is contrary to that outlined by GDS in that the mix that has been adopted (based on the SHMA) actually needs to be adjusted for the testing at lower densities of 30 and 35 dwellings per hectare. At these densities the relatively high proportion of smaller dwellings gives rise to a lower site coverage, than supported by the available evidence. As a result (and as noted in EVA) the land is not developed efficiently and hence the mix has a limiting impact on viability. Therefore at densities of 30 and 35 dwellings per hectare the mix that has been adopted understates the viability position.

Use of Appropriate Build Cost Data

- 3.19 We have provided the Briefing Note at **Appendix 1** in response to the comments made by GDS relating to the use of our database of construction costs from other local schemes. We have also commented below as we consider appropriate on a number of other points raised by GDS.
- 3.20 GDS have asserted that our database is flawed; we do not agree. The database contains details of the respective developer's own data, as included within their Financial Appraisals. GDS suggest that this is not based on information from actual construction costs. If these assertions are correct then Developers are not submitting information based on actual costs and their financial appraisals are thus unreliable. In our experience Developers do not all rely on BCIS costs for their Viability Appraisals and it can only be reasonable to assume their cost assessments are based on cost details from past developments.
- 3.21 GDS have stated that BCIS costs are based on actual costs of construction. That is technically incorrect. BCIS receive their underlying cost data from Quantity Surveyors or similar who are appointed to manage construction contracts on behalf of clients, the large majority of which are providers of affordable housing, as we have discussed in paragraph 2.2-2.3 of the RCC. The submission of this information to BCIS, as a rule, happens once a construction contract is agreed but prior to the start of construction. The actual cost of construction is that agreed upon completion of construction in accordance with the terms of the construction contract. Once the works have been completed; the final costs will vary from the initial Contract Sum for many reasons and will not be agreed until at least 12 months or more after information has been sent to BCIS.

- 3.22 The prediction of future costs whether by a Quantity Surveyor for a client or by a Developer for use within a Viability Appraisal will always tend to be prudent. It is important to ensure that the costs predicted will be sufficient to cover all aspects of the works being costed. That prudence will naturally lead to a tendency to overestimate rather than to underestimate and, as a result, the likelihood is that estimated costs at the outset will be higher rather than lower. If the GDS contention is that the Developers' predicted costs are incorrect as they are not based on actual costs then it follows that that given the circumstances, GDS consider them too high, rather than too low.
- 3.23 As noted in paragraph 2.2 of the RCC private open market developers rarely if at all submit data to BCIS. The developers will not publish cost information, citing commercial confidentiality, but insist on others providing transparency of information (as is the case here) that should in reality be based on the information that they themselves refuse to publish. The use of BCIS costs is an opaque approach due to the inapplicability of the data to market housing schemes and the lack of transparency in the background to the costs that are being used as a basis for the average rates.
- 3.24 GDS state that it is not possible with reference to the database to determine whether or not there has been a planning consent and that would affect the level of fees. We have not captured this data, however it is our view and experience that the construction costs will always include all works and fees whether already expended or not. It is not unusual for us to see previously expended or sunk costs included within development costs. Where these are found they will generally include enabling works or fees.
- 3.25 It is our strong view that Developers will always include all possible applicable costs in the Viability Appraisal as not to do so would skew that viability in a way contrary to their commercial interests. These costs would also include the shared infrastructure costs that GDS have noted.
- 3.26 GDS state that they consider, from past examination of our database that significant costs are missing. Neither example nor evidence of this is provided and we have taken great care to ensure that all costs are included. Our database has been checked and updated since last published in connection with Cheshire East CIL and we know of no costs that are missing.
- 3.27 The briefing note contained at **Appendix 1** includes the database as a PDF document for records purposes and publication. It can also be made available in Excel format if required, but due to commercial confidentiality formulae will not be included as they would refer back to data that cannot be published.

- 3.28 GDS have stated that there are few developments greater than 250 dwellings. In our current dataset there are 12 developments within this category. Large developments of this size form a minority of the developments that we have been asked to review and therefore will form the minority in our evidence; this is inevitable and it is not clear why GDS think that this reflection of reality is a flaw. There also two further points that lead from this.
- 3.29 Firstly, Keppie Massie undertake work for many LPAs and consider developments that require a review of viability. We do not see those developments that do not require a review of viability because they are policy compliant. We therefore only derive evidence from non-policy compliant developments; by their nature these are likely to be less economic than those developments that are compliant. We have not taken this into account but the inclusion of more economic, viable developments would be likely to reduce the average costs of developments from those shown in the dataset.
- 3.30 Secondly, while it may be claimed that the number of developments with a high number of dwellings (over 250 dwellings) is relatively few, the costs derived from BCIS include few or no developments that fall in this this size category. As noted in paragraph 2.7 of the RCC, of the 160 developments published by BCIS at January 2017, we established that the average number of dwellings per development was 18. Paragraph 2.8 referenced details of a further 20 that had been published since this earlier date with an average size of only 10 dwellings. Clearly BCIS data are not representative of the larger development schemes, particularly over 250 dwellings, being considered in the EVA. With reference to the briefing note at **Appendix 1**, our database is significantly more representative of the size of developments proposed in the Local Plan.
- 3.31 GDS have mentioned fees and contingency percentages based on their review of a historic version of our dataset. The updated version of the dataset expresses the fees and contingencies in accordance with the approach advocated by GDS.
- 3.32 GDS have suggested that we should use BCIS costs for residential developments because we use them for commercial developments. This is to misunderstand the nature of these costs and how they are derived. Commercial developments are carried out by Developers who employ design teams and contractors; the costs of (some of) those developments are then submitted to BCIS and will form the basis of the average costs that they publish. That is exactly the same process that the providers of affordable housing / registered providers undertake in relation to housing schemes. If we were costing small developments of affordable housing then adopting BCIS would be a comparable and sensible approach. As we have noted however, the Developers constructing open market developments do not provide data to BCIS and operate quite differently from RPs.

Keppie Massie Report on Construction Costs (RCC)

- 3.33 The briefing note contained at **Appendix 1** contains a breakdown of the generic construction cost assessments. With reference to the matters listed in the final two paragraphs on page 16 of the GDS response, we can confirm that these items are included in the construction cost assessments.
- 3.34 With reference to page 17 of the GDS response, for the avoidance of doubt the costs for the following items are also included in the construction cost assessments:
- a) Surface water attenuation/Sustainable Drainage Systems;
 - b) Provision of open space for developments greater than 40 dwellings;
 - c) Ducting for cable and broadband.
- 3.35 Costs for the following matters are not contained in the construction cost summaries contained in the RCC, but are included separately within the EVA financial appraisals:
- a) S106 Costs;
 - b) M4(2) and M4 (3) costs;
 - c) Education contributions.
- 3.36 GDS suggest that white goods/appliances and tile finishes to bathrooms should be included. In our experience white goods/appliances can be provided on some developments, but not others and certainly not the majority. GDS have provided no evidence to support the assertion that this is true in the majority of cases. White goods/appliances would have a typical cost of between £500 and £1,000 per dwelling. Even with the addition of fees and contingencies to these costs, they would fall below 1% of the construction cost of typical dwellings; that difference is not significant. In addition we have considerable experience gained over 40 years working on residential projects for RPs. As a result we are aware that they do not provide these items to their rented dwellings (except for special housing for the disabled or the like). It follows that costs for these items would also not be included within the costs submitted to BCIS either and hence the average rates produced by BCIS.
- 3.37 Tile finishes to bathrooms are included in the construction cost assessments contained in the RCC.
- 3.38 For the avoidance of doubt site opening up costs for greenfield sites are not included in the total costs for the generic sites contained at Appendix B of the RCC. They are added in addition to these costs at the rates contained in paragraph 2.36 of the RCC.

- 3.39 GDS make reference to the Harman guidance and whether the cost of other opening up costs are included within the total costs for the generic cost assessments. They refer to an allowance of £17,000 to £23,000 per plot noted in the Harman Guidance which they infer is for opening up costs. We have noted that the Harman Guidance doesn't define the term 'opening up costs'. The reference to the cost range identified by GDS is at Appendix B of the Harman Guidance, namely in relation to strategic infrastructure and utility costs, not opening up costs.

"Strategic infrastructure and utility costs

Many models use construction cost information provided by BCIS or other sources. While this is regarded as a legitimate starting point, care is needed in understanding what is both included and excluded from such cost indices. Cost indices rarely provide data on the costs associated with providing serviced housing parcels, ie. strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes."

- 3.40 Strategic infrastructure and utility costs are not defined and we consider that the reference is used in respect of the main roads and sewers that most developments will require. The costs for these items are already included within the construction cost assessments contained in the RCC, although are not within BCIS costs.
- 3.41 We have allowed separately for the costs that could be necessary to open the site up, principally off-site costs. These vary greatly from development to development and some will exceed the amounts shown and others may face little cost in this respect.
- 3.42 GDS suggest that for other local authority areas the professional fee range that has been adopted has been between 8% and 12%. No further information is provided. GDS themselves state that 7% should be adopted for smaller sites and between 10% and 12% for large sites. With reference to the briefing note contained at **Appendix 1** these fee levels are not supported by our database with the average fee level ranging from 6.34% down to 4.71% dependent on scheme size.
- 3.43 For completeness we have also checked the FVAs submitted to us for review by GDS. We have summarised the details of the professional fee allowances contained in these assessments at table 3.2. Table 3.2 shows that the evidence of actual professional fee allowances provided by GDS on behalf of their housebuilder clients does not support their contention of fees at 10% to 12% for large sites. The largest allowance they have made for fees is at 8% including in relation to a large strategic site, and the most frequent assumption that they made is at 7%. This includes in relation to another large strategic site.

Professional Fee Allowance (% Cost)	No of Schemes	Average Scheme Size (no dwellings)	Min Size (no dwellings)	Max Size (no dwellings)
8.0%	5	297	10	1,251
7.5%	6	59	27	155
7.0%	25	142	14	1,200
6.5%	1	88	88	88
5.0%	1	44	44	44
	38			

Table 3.2: GDS Professional Fee Allowances

- 3.44 The professional fee allowances in table 3.2 are significantly below the fee levels that GDS are now advocating, and the fee allowances in table 3.2 are also far in excess of the industry norm represented by the large number of developments that we have considered and as contained in the database information at **Appendix 1**.

Contractor's Profit

- 3.45 Further detail in relation to contractors profit is contained in the Briefing Note at **Appendix 1**. GDS accept that some developers act as their own Contractor, managing the construction for themselves. It is our experience that this is what the majority of developers, large or small, do. Developers take their profit from revenue, at levels much higher (15 – 20% of GDV) than normal construction profit (c 7% of cost). To include a Main Contractor's profit in addition to the revenue based profit would be to raise overall profit levels to well in excess of 20% of GDV by double counting.
- 3.46 The use of BCIS costs reflects RPs' use of arm's length formal construction contracts for dwellings designed for that development, under which Main Contractors do require a level of profit and it is part of the reason that BCIS costs based on formal construction contracts are not appropriate to open market developments.
- 3.47 Our construction cost assessments exclude contractor's profit and this approach has been adopted by us in all of the Local Plan and CIL EVAs that we have prepared and have been found sound. It is a point also accepted by the majority of housebuilders and reflected in the FVAs that are submitted to us. This includes costs in relation to a recent FVA prepared on behalf of GDS's client (Taylor Wimpey) where an FVA submitted on their behalf by another organisation included a deduction for contractors profit at a rate actually in excess of the allowance that we adopt.

Comparison of KM Costs against Recognised Alternative Data

- 3.48 This section in the GR considers a comparison between our data and BCIS. This has been dealt with in the response provided above and in the Briefing Note contained at **Appendix 1**.
- 3.49 One point to note is that GDS suggest external works costs of 12% to 15% of cost. In the FVAs they have submitted to us for review, few are based on external works costs at this level, indeed where the allowance for external works is stated, then in two thirds of cases this is based on 10% or less and just under half at 7.5% or less.
- 3.50 We agree with GDS in relation to the garages and the fact that BCIS costs do not include costs for garages. This is for two reasons; one is because the developments that BCIS use as a basis include no significant garages as RPs do not build these except for housing for the disabled, although if they did their costs would include the costs of integral garages because these would fall within superstructure costs.
- 3.51 The second reason is that non-integral garages would fall outside the building structure and their costs are thus not included. We agree in broad terms with costs of £7,000 and £11,000 for single and double garages respectively and our construction cost assessments include an allowance of £7,400 and £11,800 respectively for garages before percentage adjustment for fees, profit etc.
- 3.52 GDS have suggested that BCIS one-off housing should be used for the costs of small developments contained in the EVA (5 dwellings), despite these smaller developments not meeting the definition of one-off (<3no) developments. The BCIS costs apply to bespoke very small developments that are largely of an aspirational nature. We consider it is completely inappropriate as a basis for costing the relatively simple small developments being considered in the EVA.
- 3.53 We have obtained summary details from BCIS for published analyses within the category of one-off dwellings. There are 52 of these and we have also summarised the information at table 3.3.

Development	BCIS reference	No dwellings	GFA
Detached House, Plot 4, Newstead Farm	28879	1 No	306 m2
Luxury House, Ottersholme	28941	1 No	782 m2
Private House	29128	1 No	265 m2
House, Tirley Lane	29141	1 No	355 m2
3 Luxury Houses	30018	3 No	2206 m2
Detached House, Summerland Lane	30091	1 No	304 m2
Private Detached House	30490	1 No	402 m2
7 Bedroom Detached House	31076	1 No	805 m2
2 Semi-detached Houses, Bethel Chapel, Park Road	31336	2 No	190 m2
Detached House, West Strand	31454	1 No	568 m2
Detached Farmhouse, Hopkins Farm	31469	1 No	166 m2
2 Detached Houses, Former Foxhunter Public House Site	32000	2 No	235 m2
2 Semi-detached Houses, Ednam House	32007	2 No	289 m2
2 Semi-detached Houses, 10-12 Muswell Hill	32009	2 No	257 m2
2 Semi-Detached Houses	32052	2 No	167 m2
3 Bedroom Detached House	32069	1 No	160 m2
3 Bedroom Detached Bungalow	32070	1 No	106 m2
4 Bedroom Detached House	32071	1 No	293 m2
Detached Private Country House	32084	1 No	5464 m2
2 Semi-detached Houses, Limpsfield Avenue	32241	2 No	198 m2
2 Detached Houses	32323	2 No	984 m2
Knole Hurst House, Bishops Avenue	32360	1 No	1201 m2
Detached House, Isle of Skye	32503	1 No	275 m2
2 Semi-Detached Houses, Harrowby Road	32623	2 No	154 m2
Replacement Detached House, Cloes Lane	32640	1 No	84 m2
Detached House, Jersey	32644	1 No	486 m2
Detached Holiday Cottage, Doune	32718	1 No	255 m2
Detached House	32891	1 No	489 m2

Table 3.3: Summary Details from BCIS for Published Analyses within the category of One-off Dwellings

Development	BCIS reference	No dwellings	GFA
3 Houses, North	32918	3 No	270 m2
Detached Low Carbon Eco Home, St Catherines, Paice Lane	33036	1 No	271 m2
Detached House	33051	1 No	92 m2
Luxury Detached Manor House	33134	1 No	1253 m2
2 Detached Houses, The Clump	33301	2 No	968 m2
Detached House	33305	1 No	271 m2
2 Detached Houses, 126 Springfield Road	33421	2 No	349 m2
Detached House, Headland	33440	1 No	357 m2
Beach House, La Grande Route de la Cote, Jersey	33666	1 No	583 m2
Detached Luxury House	33763	1 No	306 m2
Detached House	33829	1 No	762 m2
2 Semi-Detached Houses, Pershore Close	33947	2 No	164 m2
Private Detached Luxury House	34014	1 No	449 m2
Private House Extension	32580	1 No	337 m2
Private Detached House	32530	1 No	317 m2
4 Bedroom Detached House, Cliff Road	31025	1 No	365 m2
Detached House, Cumbria	31585	1 No	355 m2
6 Bedroom Detached House, Courtenay House, Lawfords Hill Road	31064	1 No	612 m2
Detached House, Field View, Southlands Close	31193	1 No	247 m2
3 Affordable Terraced Houses, Adelaide Road	31277	3 No	2344 m2
Detached House, Townfoot	32361	1 No	153 m2
Detached House	30742	1 No	479 m2
Luxury Detached House, Lynwood	31465	1 No	799 m2
2 Semi-detached Houses, Warwick Road	31172	2 No	244 m2
52 developments			
Totals		70 No	29793 m2
Average number of dwellings / development		1.35	
Average GFA / dwelling		426 m2	

Table 3.3: Summary Details from BCIS for Published Analyses within the category of One-off Dwellings (cont/d)

- 3.54 As can be seen, the average number of dwellings is only just over 1 and substantially fewer than the 5 dwellings assessed in the smallest generic scheme in the EVA. The average dwelling size is 426m², over three times the area of the largest dwelling included within the EVA. A review of the analysis shows that a large number of the schemes are aspirational and true one-offs and will be of very high specification. In many cases costs exceed £2,500/m² and there are several in excess of £4,500/m². While there may be individual developments within this sample that might be thought comparable, they are few in number and they will be at the lower end of the cost range but will still reflect a smaller development than we are considering at 5 units. This BCIS category is quite inappropriate as a basis for costs in connection with the small schemes in the EVA and it is not clear why GDS consider it is appropriate to compare housing of this type with that being assessed in the EVA.

Apartment Block Costs

- 3.55 The RCC at Appendix C provides a detailed breakdown of how our construction costs have been assessed for the apartment developments. These costs have been prepared having regard to detailed cost plans that have been submitted to us/prepared by us in relation to a number of apartment schemes locally. GDS do not provide any comments on the quantities and rates adopted and simply dismiss the approach in favour of BCIS.
- 3.56 We have assessed the number of dwellings per apartment scheme from a sample of 84 analyses published by BCIS for developments of flats; that number is 23. This is closer in size to the numbers used in costs for the flats for the RCC. However, it remains our view that the other points made in respect of the use of BCIS costs for open market developments are applicable to flats as well as houses. Our own costs have been derived from cost data, in various forms, including cost plans that we have prepared or been provided with as well as costs per sq.m proposed by developers.

Building Regulation Optional Standards

- 3.57 GDS seek clarification of the impact on net sales prices assumed due to these standards. The viability assessments do not include any adjustments to reflect the increased sales prices that may be achieved for a dwelling that benefits from these standards. The viability testing in relation to these standards is therefore based on the sales revenues contained at table 5.3 of the EVA.

Electric Vehicle Charging Points

- 3.58 Reference is made by GDS to a higher cost of £300 to £350 per dwelling and to the need for additional reinforcement of infrastructure and substations. The cost assessed by our QS at £220 per dwelling reflects the cost recently agreed with a national house builder for a major strategic brownfield/greenfield site in South Ribble and is therefore considered to be reasonable and realistic. It is a cost we have also adopted elsewhere in preparing viability assessments.
- 3.59 The cost that we have allowed for EVCPs has been based on costs for cabling and a point for future connection, and is a cost typical of those received from Developers on developments that have included this work. The cost would not include the actual charging point itself. We assume that the higher cost that GDS have proposed does include this, they do not make this clear. We consider that the charging point should be excluded as this cost can be grant aided provided that the installation is made as a part of the purchase of an electric car. That cannot apply to a developer and our experience has been that this policy is there to allow the convenient fitting of the charging point when needed in the future.
- 3.60 GDS have also noted that electrical infrastructure reinforcement has been required on one single development and that we have made no allowance for this. We have yet to encounter a development that has required this, although do understand why this might be so, as large-scale use of electric car charging will place burdens on the electrical supply network and if this has inadequate capacity then it may be that reinforcement will be needed. That will depend on the state of the local infrastructure as well as whether the policy is complied with.

Site Specific S106 Costs

- 3.61 GDS suggest that the allowance of £1,000 per dwelling in residual S106 costs may be sufficient for smaller schemes but inadequate for the larger schemes. Although no support for this comment is provided.
- 3.62 The S106 contribution is based on residual requirement for S106 contributions excluding requirements for affordable housing, open space and education. Table 3.4 contains a summary of the S106 contributions secured by the Council from applications providing a total of 3,545 dwellings. The table includes details of the total sum together with the number of dwellings that have contributed to the total and finally the overall amount per dwelling based on the number of dwellings contributing.

	POS	High	Affordable	Health	Education
Total Amount	£854,294	£294,493	£3,206,065	£150,000	£72,358
Total Dwellings	1,269	1,989	1,269	630	358
Amount per dwelling	£673	£148	£2,526	£238	£202

Table 3.4: Summary of S106 Contributions

- 3.63 Requirements for POS, Affordable Housing and Education are dealt with elsewhere in the testing, therefore in terms of the data in table 3.4, it is only requirements for highways and health contributions that would need to be covered by the residual sum of £1,000 per dwelling. The data from table 3.4 shows that a total amount of only £386 per dwelling has on average been collected for these items although not all developments are required to make contributions under these headings. Based on the total number of dwellings included in the applications of 3,545 only 56% of the consented dwellings have been required to provide a highways contribution and only 18% have contributed towards health provision.
- 3.64 Based on the analysis of S106 contributions then the residual sum assumed in the EVA at £1,000 per dwelling, is well in excess of the average total residual amount of £386 per dwelling. Indeed based on the evidence of S106 contributions, a number of future developments may not in fact be subject to a residual S106 contribution for matters such as highways or health.
- 3.65 In relation to the allocations specific allowances have been included for known S106 requirements for matters such as playing provision, POS and highways and details are contained the cost sheets within the QS Report at Appendix 5 of the EVA.

Conclusions on Reliance on KM Cost Database

- 3.66 No compelling evidence has been provided by GDS to support why BCIS is a better, more appropriate data source save for their reference to the PPG. We have noted however that in the PPG, BCIS is only given as one example of an appropriate data source. Indeed the PPG states that assessment of costs should be based on evidence which is reflective of local market conditions.

- 3.67 We have noted at paragraphs 2.2 to 2.9 of the RCC, the limitations of BCIS. In particular the source of data, predominantly from registered providers and for small schemes with an average size of less than 18 makes it of limited relevance to the assessment of cost for large open market developments. Most Registered providers undertake bespoke developments that use bespoke house types designed for that development. While these are, generally, not complex or unusually costly designs, they differ from scheme to scheme, increasing design costs and not realising the economic benefits of standardisation that developers, particularly the larger ones, gain from using a suite of predesigned standard house types.
- 3.68 We are not persuaded that there is a better source of data than our own database in preparing assessments of cost of open market schemes in St Helens once RP developments and outliers are removed. On this basis the dataset for the RCC includes 171 developments with schemes ranging in size from 4 dwellings to 1,322 dwellings. We have been able to interrogate this information with reference to actual schemes so are assured as to the applicability of this data to St Helens in respect of the type, nature of developer, style and size of housing development. With reference to BCIS the data is not sufficiently transparent even with the analysis provided to ensure applicability to the form of development to be provided here. On the balance of evidence our evidence as to construction costs is to be preferred as it is more representative of the locality, nature, form, scale and delivery of development likely to come forward as part of the plan process.
- 3.69 The PPG states that assessment of costs should be based on evidence which is reflective of local market conditions and our database fully accords with this requirement. In the absence of such local evidence of costs, then an alternative may be to use BCIS (with suitable adjustments) but this is in the event that such local evidence does not exist, this clearly isn't the case here.

Residential Net Sales Prices

- 3.70 GDS are in broad agreement with the net sales prices adopted. They do however make reference to sales incentives being around 5% in strong market conditions and up to 10% in poorer market conditions or for poor performing sites. No evidence to support this statement is provided. The extent of the discounts suggested is excessive in our experience and at these levels would lead to a down valuing of the property for mortgage purposes. We have reviewed a number of viability assessments prepared by GDS and they in almost all cases assume a 2.5% reduction to sales prices for incentives irrespective of the local market. This clearly does not reflect the comments they have made in relation to a 5-10% reduction for incentives.

- 3.71 House builders are generally reluctant to provide incentives information for confidentiality reasons. GDS have recently provided to us sales and incentives information for a large residential development in the neighbouring authority of Knowsley, this evidence demonstrated an average incentive rate of 1.3%. We are currently preparing valuations of new houses for a major housebuilder in a lower value area with poor market conditions, here the average level of incentives on sales to date has been 3.74%.

Affordable Housing

- 3.72 GDS make reference to difficulties in dealing with social rented housing. The EVA assumes provision for affordable rented rather than social rented dwellings. GDS suggest that affordable rented units should be valued at 40% of market value. In our experience this is low and the figure of 45% of market value contained in the EVA is realistic. Other than the comments received from GDS has not been disputed by others.
- 3.73 GDS also suggest that intermediate dwellings should be valued at 65% of market value however no evidence whatsoever is provided by them to support this opinion. The definition of Affordable Home ownership includes a number of forms of affordable housing the most common being shared ownership. With reference to Appendix 2 of the EVA we have provided details of recent S106 sales of shared ownership units. The data in relation to the Willows shows shared ownership sales at 65-66% of the value of the equivalent market unit, whilst the data for Vulcan Park shows the sale prices for the shared ownership units at between 77% - 81% of the value of the equivalent market unit. The average of the respective selling prices is 70% of market value and this is the figure that we have adopted in the EVA.

Benchmark Land Value

- 3.74 GDS do not believe that the differentiation between Brownfield values and Greenfield values is correct.
- 3.75 We have dealt with very many Local Plan and CIL Viability Assessments that have been found sound as outlined in para 1.14 of the EVA. It is our experience that reflecting the relevant guidance there is always a differentiation between greenfield and brownfield benchmark land values reflecting the fact that greenfield sites have significantly lower existing use values than previously developed sites. There may be certain instances in low value areas such as for Zone 1 here, were that impact of the land owner premium results in similar benchmark land value for the two types of site.

- 3.76 The most up to date CIL guidance acknowledges the differentiation between the benchmark land values for greenfield and brownfield sites by allowing LPAs to set differential rates reflecting the differences in land value uplift created by development. In doing so this allows LPAs to optimise the funding received through the levy.
- 3.77 This differential approach is considered to be wholly appropriate in assessing benchmark land values as it reflects good practice guidance and, in this context, the respective differences in existing use value between what is generally agricultural land with a low existing use value and brownfield land which typically is in some form of commercial use with a much higher value.
- 3.78 In terms of greenfield land the most recent RICS Rural Market Survey for the North West (H1 2018) reported arable land values at £9,375 per acre and pastoral land values at £6,375 per acre. This compares with existing use values for commercial development land in the region of £100,000 per acre to £200,000 per acre and for the more tertiary sites sometimes less. Clearly from the starting point of existing use value there is a significant difference between greenfield and brownfield land values
- 3.79 GDS also state that the £150,000 and £250,000 proposed for Greenfield Sites is significantly below achieved sales values. If a full analysis of current market values was carried they believe that this would support a much closer correlation between Greenfield and Brownfield values which should be reflected in the Benchmark Land Values adopted.
- 3.80 GDS unfortunately do not provide any evidence or analysis of current market values, to support their contention that the benchmark land values for greenfield sites are below achieved sales values and there is close correlation between greenfield and brownfield values. This is certainly not evident from the evidence of residential land sales provided at Appendix 4 of the EVA. There are 3 sales listed in Zone 2 from July 2015, two comprising former playing fields with ancillary buildings (Leach Lane and Broadway) and one comprising entirely open land. The prices paid for these sites are generally at a discount to brownfield site in zone 2.
- 3.81 Similarly GDS do not provide any evidence to support their contention that industrial land is achieving values higher than £150,000 per acre. Evidence of commercial land sales is provided at Appendix 4 with sold prices ranging from £22,222 per acre to £169,082 per acre. In our experience fully serviced, greenfield employment land will be available in the northwest for prices in excess of £150,000 per acre in the better locations. In the context of the EVA however we are considering redundant commercial land, in less accessible locations which is no longer considered to be suitable for employment purposes. In the absence of any evidence of commercial land values from GDS we would question whether they are comparing like with like in order to inform their view of existing use value.

- 3.82 Finally GDS state that benchmark land values should be increased by around £100,000 to £150,000 to allow for abnormal costs so that they can then be deducted once known to ensure the landowner still achieves a return. This is clearly at odds with the PPG which suggests that land values should be reduced rather than increased to reflect abnormal costs. It would also mean that the benchmark land value would be increased for all sites even if they did not have abnormals. It is not clear from the statement made whether GDS suggest the sum of £100,000 to £150,000 should be added to the total benchmark land value in each case, or whether this reference should be to £100,000 to £150,000 per acre.

Acquisition Costs

- 3.83 GDS agree that the allowance made of 1.8% is within the range of costs within the market but say that it is at the lower end of the range and is not conservative. No evidence is provided to support the statement that 1.8% is at the lower end of the range.
- 3.84 The assumption in the EVA is based on evidence gathered by us from FVAs we have reviewed for LPAs and also prepared for developers. Specifically in relation to the FVAs reviewed on behalf of LPAs we have analysed acquisition costs from those assessments that have been submitted to us for review by LPAs across the North West post 2012 NPPF. We have analysed 219 FVAs where acquisition costs are stated in the financial appraisals. The appraisals relate to schemes ranging in size from 4 dwellings to 1,250 dwellings and have been prepared by surveyors (including GDS) acting on behalf of housebuilders, the house builders themselves, site promoters, architects and quantity surveyors. From the schemes analysed total acquisition costs range from 0% up to 5%. In a number of cases, often when the residual land value generated by the appraisal is a negative figure, a fixed monetary sum has been included.
- 3.85 Within table 3.5 we have summarised the analysis undertaken. The table includes details of the different percentage acquisition cost ranges, the frequency of appraisals adopting a rate within that particular range and then the overall percentage of FVAs within that range. We regularly review FVAs submitted by GDS themselves and so for completeness we have also included the number of assessments submitted by GDS that adopt the particular acquisition cost range. We should stress that this information is based on the initial FVA submitted to us for review by the developer or their agent and they are often concluded at lower figures.

Acquisition Cost Range	No of FVAs	Percentage of FVAs	No of GDS FVAs
Not Included	20	9.13%	2
0.5% or less	12	5.48%	
0.51% - 0.99%	12	5.48%	
1% - 1.49%	32	14.61%	1
1.5% - 1.8%	56	25.57%	4
1.81% - 2.29%	43	19.63%	22
2.3% plus	23	10.50%	
Fixed Sum	21	9.59%	10

Table 3.5: Acquisition Cost Summary

- 3.88 If as recommended by GDS the agent's fee level is increased by 0.5%, the overall total acquisition cost allowance would be at 2.3%. With reference to table 3.5, of the FVAs we have reviewed where acquisition costs are stated, only 10% of FVAs include a percentage acquisition cost of 2.3% or more. Conversely 132 or 60% of appraisals include acquisition costs of 1.8% or less. In fact the most common allowance made is in the range of 1.5% - 1.8% with a quarter of assessments including fees in this range. This includes FVAs submitted by Surveying Practices such as Turley, Savills, Cushman and Wakefield and Lambert Smith Hampton. These FVAs have been prepared by them on behalf of major house builders including for example Morris Homes, Persimmon and Barratt/DWH. There are also 4 assessments submitted on behalf of Taylor Wimpey who are GDS's clients in this particular matter where the acquisition costs adopted are in the range of 1.5% or 1.8%. The GDS assertion of acquisition costs at 2.3% is clearly not justified by the approach taken by others including by their client.
- 3.89 There have been far fewer FVAs submitted to us with acquisition cost percentage allowances in excess of 1.8%. The table shows that approximately 30% of FVAs submitted to us contain percentage allowances in excess of 1.8%, and of these 22 or one third have been submitted by GDS themselves. This suggests that the recommendation by GDS to increase fee levels is not supported by the evidence and indeed their approach to acquisition costs is excessive in comparison with the majority of the agents and housebuilders submitting FVAs for review. The information at table 3.5 is also clearly at odds with the suggestion that the fee level adopted in the FVA at 1.8% is at the lower end of the range. Clearly the allowance is not conservative, it is reasonable and robust and in line with evidence of acquisition cost rates adopted in the majority of FVAs locally.

- 3.90 GDS also suggest that a fixed fee should be included for the smaller generic sites. We assume this is a reference to the schemes of 10 and 5 dwellings tested in the EVA. Included in the analysis of the FVAs are 22 schemes of 10 dwellings or less. Of these schemes 14 included acquisition costs calculated on a percentage basis ranging from 0.3% up to 3%, although only 3 where in excess of 1.8%. Another two had fixed fees at £10,000 or less and the remaining schemes either contained no acquisition costs, or did not provide a breakdown of the overall total land and acquisition cost to allow analysis. The approach in the FVA of including an allowance of 1.8% for acquisition costs is therefore supported both in relation to the small and larger sites tested.

Finance

- 3.91 In relation to finance costs GDS state that the finance rate adopted in the EVA at 7% is realistic but go on to say that a higher rate of at least 10% should be used for smaller developments. They do not provide any evidence in support of this recommendation.
- 3.92 We disagree with the suggestion made of a finance rate of at least 10% for smaller schemes. With reference to our analysis of FVAs submitted we have provided in table 3.6, details of the finance rates that have been adopted for the smaller schemes of 30 dwellings or less that we have reviewed. The data has been presented to show the number of schemes in the debit rate range noted and the overall percentage. We have also included details of the number of schemes where a credit rate has been applied and also where additional fees have been included.
- 3.93 In a number of cases the finance rate adopted is not stated and these are also included together with those instances where finance costs are not included or have been specifically included in the gross profit stated.

Debit Rate	No	Percentage	Inc Credit Rate	Additional Fees
3% or less	3	3.16%		3
3.01 - 4%	3	3.16%		2
4.01-5%	9	9.47%		3
5.01% - 6%	13	13.68%	2	4
6.01% - 7%	34	35.79%	7	1
7.01% - 8%	8	8.42%		2
8.01% - 9%	0	0.00%		
More than 9%	1	1.05%		
Not stated	17	17.89%		
Not included	3	3.16%		
Inc in gross profit	2	2.11%		
Other	2	2.11%		
	95		9	15

Table 3.6: Finance Cost Assumptions Schemes of 30 dwellings or less

- 3.94 Table 3.6 shows that overall 65% of the FVAs for schemes of 30 dwellings or less adopted a finance rate of 7% or less. This rises to just under 80% if the schemes where the finance rate is not stated are removed. In addition with reference to the final 3 rows a further 7 schemes (7%) included either no finance costs or a nominal allowance. Of those schemes where a debit rate was stated only 1 was at a rate of more than 9%. With additional fees included we estimate that a further two schemes assessed would incur finance costs in excess of 9%.
- 3.95 The EVA assumes a finance rate of 7%. The evidence in table 3.6 demonstrates that 6.01 – 7% is the most commonly assumed debit rate adopted in the FVAs that we have assessed for developments of 30 units or less. Indeed 40 of the schemes we have considered (42%) actually adopt a debit rate of less than 7%. We have noted that 5 of the schemes of 30 dwellings or less had FVAs prepared by GDS. All 5 FVAs were based on finance rates less than 7%. These included schemes ranging in size from 14 up to 30 homes, which finance rates ranging from 6.4% to 6.75%. Clearly when looking at actual development schemes, GDS consider that a significantly lower finance rate is more appropriate. This is more in line with our assumption of 7% rather than their unjustified assumption of at least 10%.

Developer's Profit

- 3.96 Again whilst agreeing with the developer profit of 20% of GDV adopted in the EVA, GDS infer a higher figure may be required by developers. They suggest that 20% should be seen as an absolute minimum requirement with many developers requiring in excess of this amount. No evidence is provided to substantiate this statement.

- 3.97 It should be stressed that the PPG identifies a range of 15-20% as being a suitable return to developers in order to establish the viability of plan policies, with a lower figure more appropriate in consideration of the delivery of affordable housing. The approach taken in the EVA adopts a developers profit at the very highest end of the recommended range (20%) and applies this to both market and affordable housing. No adjustment is made for a lower profit on the affordable units. As a result the approach in the EVA is considered to be extremely robust and is certainly more generous than the position outlined in the PPG.
- 3.98 For completeness we have provided at table 3.7 a summary of the developers profit assumptions made in FVAs that have been submitted to us for review. These are the initial profit requirements that have been suggested by the developers in their submissions rather than the lower profit requirements that may have eventually be agreed or adopted following review. The summary data has been presented to show the particular profit range, number of FVAs submitted based on that range, overall percentage of the total number and finally the number of appraisals that then included a stated lower profit for the affordable units. In some cases the profit requirement stated is slightly lower as it represents a blended figure across the market and affordable units, whilst in others the profit requirement is stated separately for the market and affordable houses resulting in a higher figure for the market units.

Profit	No	Percentage	No with Reduced AH profit
Less than 10%	3	1.49%	
10%-14.99%	8	3.96%	1
15%-17.49%	20	9.90%	1
17.5%-19.99%	44	21.78%	4
20% inc finance	2	0.99%	
20%	94	46.53%	20
Over 20%	9	4.46%	1
Less than 15% cost	3	1.49%	
15%-20% cost	18	8.91%	
Over 20% cost	1	0.50%	
	202		27

Table 3.7: Summary of Profit Requirements

3.99 The data shows that housebuilders often have different approaches to the assessment of profit. In the majority of cases profit assumptions are based on a percentage of GDV, and sometimes this is a gross figure inclusive of finance. In other cases however the profit calculation is based on a percentage of cost. Generally in those cases where profit is based on cost then the equivalent percentage of GDV will be much lower, often by up to 5%. Overwhelmingly developers assume a profit of 20% or less based on GDV or cost. In only 9 instances (less than 5%) have developers adopted a profit of more than 20% of GDV. Clearly if GDS are correct and many developers do require profits of more than 20% of GDV, then this is not supported by the evidence of FVAs submitted to us by housebuilders and their agents, including submissions from both GDS themselves and their clients.

3.100 GDS also suggest that for the schemes of 10 units or less the profit should be 17.5% of GDV. Again no actual evidence is provided to support this claim. We have provided table 3.8 which includes details of the profit levels contained in the FVAs that have been submitted to us for review for schemes of 10 houses or less. In total there are 19 schemes.

Settlement	No Units	Profit (% GDV)	Comments
St Helens	6	11.98%	
Newton le Willows	5	15.00%	
St Helens	10	15.00%	
Leyland	9	15-20%	
Sandbach	10	18.00%	
Newton le Willows	10	18.00%	Willing to accept 8.6% to complete the scheme
St Helens	10	19.00%	No agreement on profit
Weston	4	20.00%	Ultimate profit in applicants appraisal with no obligations 14.9% of GDV
Acton	7	20.00%	Final agreement based on 18% GDV
Hadfield	9	20.00%	Final agreement based on 18% GDV
Congleton	10	20.00%	GDS scheme no agreement on profit
Rainhill	10	20.00%	No agreement on profit
Forton	10	20.00%	Developer willing to proceed on basis of 14.24% GDV
St Helens	5	21.00%	Profit inclusive of sales, marketing and finance costs
St Helens	6	22.00%	Profit inclusive of sales, marketing and finance costs
Brereton	8	19.3% Cost	Profit equates to 16.23% GDV
St Helens	6	Not Stated	
St Helens	7	Not Stated	Developer actually working off 15.5% GDV
Maryport	10	Not stated	Applicant appraisal no planning contributions 8.5% GDV

Table 3.8: FVA profit returns 10 houses or less

- 3.101 With reference to the information provided at the outset of the respective assessment and as summarised in table 7.1, four of the FVAs submitted appeared to be based on a minimum profit requirement that was less than 17.5% of GDV. In some cases higher figures were stated, or the applicant in the information provided did not state or provide clear information about their profit requirement. The comments table includes further information about the profit position that was established following further discussions and clarification with applicant. This shows that the profit requirements for a further 6 schemes were less than 17.5% of GDV. In two cases the stated profit requirements of 21% and 22% of GDV were actually inclusive of all marketing, sales and finance costs. The EVA adopts 3.5% for sales and marketing costs irrespective of scheme size. If the respective profits in these two cases at 21% and 22% of GDV are reduced by 3.5%, this gives 17.5% and 18.5% respectively before any deduction is made for finance costs.
- 3.102 Overall therefore from the schemes in table 3.8, we established that in fact 12 schemes were based on developer's profits at 17.5% or less. Of the remaining 7 schemes, one had a profit requirement of 18% of GDV and a further 2 were agreed at a profit of 18% of GDV. There was no agreement reached on 3 schemes will profit requirements of 19% and 20% (one being a GDS assessment). For the final scheme were the profit requirement was not stated, the information provided by the applicant was not sufficiently clear to establish their profit requirement, however the information provided demonstrated a profit position that was less than 17.5% of GDV.
- 3.103 The evidence demonstrates that in the majority of cases, the type of small, local developers undertaking schemes of 10 dwellings or less, are able to deliver new housing development at profit significantly less than the 20% figure that is being recommended by GDS. Ultimately of the 19 small schemes we have reviewed, only 2 have contained a profit at this level and one of these was in fact submitted by GDS.
- 3.104 It should also be borne in mind that the sales and marketing costs associated with a smaller scheme will be significantly less than those for a larger development as there is not the same requirements for onsite sales staff, show homes etc. The units are often simply marketed by a local estate agent. In 2018 Which reported average estate agents fees of 1.42% inclusive of VAT. In the EVA a total allowance of 3.5% of GDV has been adopted both for the smaller and larger schemes of which around 3% is effectively sales and marketing costs. Clearly in testing the smaller developments sales and marketing costs are unlikely to be at 3% and hence with reference to the Which report there is an additional buffer of around 1.5-1.75% of GDV inherently built into the appraisals, and this is effectively additional developer's profit.

4.0 CONCLUSIONS

- 4.1 We have considered the views of GDS in the GR that they have submitted however have treated these comments with a degree of caution. We have undertaken many reviews of FVAs submitted by GDS and as a result are familiar with their approach to assessing the viability of development sites in the North West. We have provided at table 4.1 a summary of the FVAs that have been submitted to us by GDS primarily on behalf of house builders over the period to the end of 2018. The summary contains details of the Local Planning Authority, type of application and the number of dwellings proposed. We have then provided details of the outcome of the financial appraisal submitted by GDS in their FVA. In all cases these are the results on the basis of a scheme with all planning obligations waived, ie with no affordable housing or S106 contributions. The results show the total scheme deficit produced by the GDS appraisal in monetary terms, together with the deficit as a percentage of GDV and on a per unit basis.
- 4.2 Of the 29 applications listed, GDS assert that only one is viable with a small surplus of only £15,000. The results demonstrate that (save for this one application), based on the cost and revenue assumptions adopted by GDS, all of the other applications are unviable even assuming a scheme of 100% market houses with all planning contributions waived. Putting these results into context, all of these new housing schemes are unviable and undeliverable even without any planning contributions. The levels of deficit in monetary terms range from -£24,810 to -£3,422,000, and as a percentage of GDV from 0.26% up to 35.71%. Over half of the applications make a loss greater than 5% of GDV, with 3 having a loss greater than 20% of GDV. For completeness we have also included details of the loss on a per units basis with the worst performing scheme demonstrating a loss of over £123,000 per unit.
- 4.3 In undertaking an independent assessment of the GDS appraisals for these applications, we have adopted a reasonable, objective and impartial approach. In some instances we have concluded that the applications can't support planning obligations but are viable, whilst in others we have concluded that they are viable and able to support some element of planning obligations. These assessments have been undertaken in line with the relevant good practice guidance using our approach (based on evidence) to the appraisal variables including build costs. That same approach that has been adopted in the preparation of the EVA.

- 4.4 The table also contains details of the current status of the sites which formed the application. The majority of the applications have now been completed or substantively completed by the respective housebuilder. Clearly the evidence of progress shows that developers have been prepared to progress these developments and endorses our more realistic and objective approach to construction costs and the other appraisal variables. This evidence of actual delivery entirely contradicts the position taken by GDS because using their appraisal inputs including construction costs, no new development is viable (even without planning contributions) and no developers would have undertaken any of these schemes due to the level of losses made. These conclusions are borne out by practice and therefore the approach taken by GDS overstates the cost of development very significantly even on the evidence of the schemes that they themselves have acted on. With reference to the comments made in Section 3 regarding appraisal inputs, then as noted many of the cost assumptions on which the GDS appraisals at table 4.1 are based are lower than those being advocated in the GR. If the cost allowances recommended in the GR were adopted then this would only serve to increase the deficits for those schemes listed in table 4.1.

LPA	Consent	No Units	Total Deficit	Total Deficit % GDV	Total Deficit (per unit)	Actual Position
Cheshire East	Full	10	-£1,231,250	-35.71%	-£123,125	Scheme completed by applicant
Wyre	S106 BA	30	-£1,663,500	-22.11%	-£55,450	Scheme substantively completed by applicant
Wyre	Full	33	-£1,664,000	-21.55%	-£50,424	Scheme substantively completed by applicant
Wirral	Outline	15	-£248,750	-9.93%	-£16,583	Viability still under discussion
West Lancs	Full	146	-£3,422,000	-9.26%	-£23,438	Scheme under construction by applicant
Sefton	Full	28	-£437,500	-8.92%	-£15,625	Scheme completed by applicant
Knowsley	Full	87	-£1,746,000	-8.85%	-£20,069	Scheme substantively completed by applicant
West Lancs	Full	94	-£1,868,000	-8.84%	-£19,872	Scheme substantively completed by applicant
Cheshire East	Full	87	-£1,584,000	-8.57%	-£18,207	Scheme substantively completed by applicant
High Peak	Full	44	-£633,000	-8.54%	-£14,386	Scheme completed by applicant
Knowsley	Variation	65	-£993,797	-8.42%	-£15,289	Scheme substantively completed by applicant
Cheshire East	Full	27	-£1,074,000	-7.32%	-£39,778	On site, homes being marketed by applicant
Sefton	Full	153	-£1,544,762	-6.77%	-£10,096	Scheme substantively completed by applicant
Sefton	Full	96	-£1,016,000	-6.60%	-£10,583	Scheme completed by applicant
Sefton	Full	57	-£1,033,000	-6.45%	-£18,123	Scheme substantively completed by applicant
CWAC	Full	72	-£908,000	-5.89%	-£12,611	On site, homes being marketed by applicant
Sefton	Outline	34	-£524,000	-4.97%	-£15,412	Scheme under construction
South Ribble	Full	188	-£1,613,750	-4.62%	-£8,584	Scheme substantively completed by applicant
South Ribble	Full	196	-£1,513,500	-3.92%	-£7,722	Scheme substantively completed by applicant
Knowsley	Full	154	-£1,300,000	-3.86%	-£8,442	On site, homes being marketed by applicant
St Helens	Full	117	-£669,000	-3.32%	-£5,718	Scheme completed by applicant
St Helens	Full	98	-£452,000	-3.08%	-£4,612	Scheme completed by applicant
Wyre	Full	100	-£434,707	-2.50%	-£4,347	Scheme completed by applicant
Cheshire East	Outline	155	-£866,000	-2.44%	-£5,587	Reserved matters consent Nov 19

LPA	Consent	No Units	Total Deficit	Total Deficit % GDV	Total Deficit (per unit)	Actual Position
High Peak	Full	119	-£409,500	-1.62%	-£3,441	On site, new homes being marketed by applicant
Wirral	Outline	35	-£130,000	-1.25%	-£3,714	
St Helens	Full	89	-£99,137	-0.69%	-£1,114	Scheme completed by applicant
St Helens	Full	88	-£24,810	-0.26%	-£282	Scheme completed by applicant
High Peak	Full	31	£15,500	0.22%	£500	

Table 4.1: Summary of GDS Viability Assessments Assuming 100% Market Housing and No Planning Contributions

- 4.5 With reference to the GR we have as appropriate provided a response in relation to the requests for clarification and further information. The answer in relation to a number of the points raised was self-evident from the content of the EVA however we have sought to further clarify matters for the benefit of all parties.
- 4.6 The GR contains assertions in relation to a number of the assumptions adopted in the EVA including for example:
- a) Site coverage (sq.ft per net developable acre);
 - b) Professional fees for larger sites;
 - c) S106 contributions for larger sites;
 - d) Sales incentives;
 - e) Affordable housing values;
 - f) Benchmark land values and existing use values;
 - g) Profit for small housing schemes at 20% of GDV;
 - h) Finance for small housing schemes at interest rates of 10%
- 4.7 However no evidence is provided in support of these assertions to allow fully informed consideration of the point made. We are content that the evidence on which the EVA is based fully supports our approach to these variables. As a result we do not consider that there is justification for any changes to the EVA assumptions and inputs, and hence the viability testing undertaken as part of the EVA. Having considered the comments contained in the GR our conclusions therefore remain unchanged.

APPENDIX 1

BRIEFING NOTE DATABASE & CONSTRUCTION COST ASSESSMENT

BRIEFING NOTE

DATABASE & CONSTRUCTION COST ASSESSMENT

ST HELENS LOCAL PLAN

ECONOMIC VIABILITY ASSESSMENT

JUNE | 2020

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	DATABASE.....	2
3.0	CONSTRUCTION COST ASSESSMENTS	6
4.0	COMPARISON WITH DATABASE.....	7
5.0	CONCLUSIONS	9

APPENDICES

Appendix A	Overall Dataset
Appendix B	St Helens only Dataset
Appendix C	Generic Construction Costs
Appendix D	Scale Factors
Appendix E	Generic Construction Cost Comparison to Database
Appendix F	Allocations Construction Cost Comparison to Database

1.0 INTRODUCTION

- 1.1 Following consultation undertaken in relation to the St Helens Local Plan Economic Viability Assessment (December 2018) (EVA), responses have been received from Turley (on behalf of Peel) and Grasscroft (GDS) (on behalf of Taylor Wimpey). With reference to the comments received regarding the Report of Construction Cost (RCC) contained at Appendix 5 of the EVA, this briefing note has been prepared to provide further detail in relation to the Database of Construction Costs that we hold and the generic construction cost assessments used in the EVA.

2.0 DATABASE

- 2.1 As noted at paragraphs 1.5 and 1.6 of the RCC we have an extensive database of local construction costs derived from information provided to us by housebuilders actively undertaking development in St Helens and the wider North West Region. The database as a whole contains approximately 230 schemes predominantly relating to new housing developments undertaken by private house builders in the region. There are within these schemes also data from housing association developments, together with schemes of conversion, refurbishment and also apartments.
- 2.2 Paragraphs 2.10 and 2.11 of the RCC explain this information has been analysed and adjusted for location and date to enable applicability for the purpose of the EVA. As noted at paragraph 2.11 the information contained in the database is confidential and hence cannot be published in its full form.
- 2.3 We have noted the responses from Turley and GDS requiring that further information in relation to the database should be made available. We have therefore provided more detailed information from the database alongside this note. In doing so we are mindful of the confidential nature of this information and hence the presentation of the data seeks to ensure that no matters of breach of confidentiality arise.
- 2.4 We have provided at **Appendix A** the overall dataset that has been used to inform the RCC. To ensure comparability with the type of development anticipated to come forward in St Helens, (and as adopted for the purpose of testing in the EVA) we have considered only those new developments which are for houses or bungalows and include less than 20% of the total number of dwellings as flats. We have excluded a small number of developments which we consider are outliers for various reasons. The information from developments of affordable dwellings by Registered Providers has also been excluded as this is not directly comparable with the form of market housing development on which the EVA testing is based.

- 2.5 The dataset includes 171 schemes which vary in size from 4 dwellings to 1,322 dwellings. We have banded the developments with reference to number of dwellings and table 1 contains details of the bands together with the number developments in each size band.

No Dwellings	No Schemes
0-24	51 no
25-49	35 no
50-74	20 no
75-99	19 no
100-149	20 no
150-225	14 no
226-500	7 no
Over 500	5 no
Total	171 no

Table 1: Ranking of Developments by Unit Number

- 2.6 The dataset at Appendix A is presented and analysed with reference to these size bands.
- 2.7 The information that we have recorded is regarded in all cases as commercially confidential. In some cases we have entered into Confidentiality Agreements that preclude us from disclosing data that is identifiable to either the development or developer. We have therefore respected the general principle of confidentiality in all cases.
- 2.8 In presenting the data at Appendix A we have therefore removed details of the name of the development, developer and the number of dwellings to ensure that no issues of confidentiality arise. To put the information into context we have however provided details of the developer type. These fall into 5 main categories – landowner, promoter and then local, regional and national housebuilder. Typically the landowner and promoter data will relate to outline planning applications, whilst the local, regional and national housebuilder data will be submitted in connection with reserved matters or full planning applications, and to a lesser degree assessments in relation to development agreements or for grant purposes.
- 2.9 The data then includes details of the following:
- Development location (Local Authority);
 - Date of our work on the viability assessment;
 - The total number of dwellings (Banded);
 - The total gross internal floor area of the dwellings (Banded).

- 2.10 We have then provided details of the developer's costs for substructures and superstructures, preliminaries, external works within and beyond curtilage, drainage, incoming services, abnormal development costs, fees and contingencies. These are the total costs which have been updated (to Q3 2018) and adjusted for location (St Helens) using BCIS Tender Price Index and location factors.
- 2.11 The dataset includes analysis of the professional fees and contingencies as a percentage of the total cost. Also provided is the overall total cost excluding abnormal costs but including professional fees and contingencies and then the overall cost per sq.m based on the total floorspace.
- 2.12 There is no standardised method or headings for providing cost information within the industry and different developers will account for the same type of costs under different headings. This is evident from the entries in the database where for example some of the developments have preliminaries, external works, drainage and services included within an overall rate which has been allocated to the base subs and superstructures. In some cases, often when detailed cost plans are provided, the financial appraisal does not include a separate contingency sum, and an element of contingency is included within the figures under each of the individual cost headings.
- 2.13 Given the different approaches to reporting cost information, the most appropriate measure of cost derived from the database is the overall total cost per sq.m excluding abnormals. Hence this has been provided in the analysis.
- 2.14 Within each size band the data analysis also includes the average and median total cost (excluding abnormals) per sq.m together with the average fee and contingency allowance. The average cost is assessed by taking the total floor area of all the developments being considered and dividing this into the sum of the total costs (exc abnormals) of those developments. We do not average the cost per sq.m from each development as this would be an average of averages which would be incorrect.
- 2.15 In addition we have extracted the data for the developments in St Helens from the main dataset and this is included in **Appendix B**. This includes costs from 46 developments.
- 2.16 It should be noted that the costs included in the dataset are those that have been submitted by the developers or their agents initially in support of the viability case. We have not made any adjustments to these figures in the dataset to reflect the fact that in many cases, due to our work with regard to viability, costs have eventually been agreed for the particular assessment at lower levels.

Dataset Summary

- 2.17 For completeness we have provided at table 2 a summary of the analysis from the overall dataset, and at table 3 for St Helens only data. This includes details of the average and median total cost per sq.m (ex abnormals) together with the range and the average fees and contingency for each band.

Band	Average (per sq.m)	Median (per sq.m)	No Scheme s	Range		Average	
				Min	Max	Fees	Cont
0-24	£1,310	£1,309	51 no	£776	£2,089	6.34%	3.15%
25-49	£1,285	£1,240	35 no	£976	£1,723	6.02%	3.22%
50-74	£1,147	£1,121	20 no	£859	£1,436	4.97%	2.48%
75-99	£1,189	£1,212	19 no	£846	£1,408	5.80%	3.28%
100-149	£1,162	£1,186	20 no	£713	£1,457	5.79%	4.07%
150-225	£1,199	£1,211	14 no	£1,014	£1,363	5.32%	3.65%
226-500	£1,171	£1,148	7 no	£952	£1,341	4.71%	1.91%
>500	£1,200	£1,157	5 no	£1,015	£1,359	5.63%	3.17%

Table 2: Overall Dataset Analysis

Band	Average (per sq.m)	Median (per sq.m)	No Scheme s	Range		Average	
				Min	Max	Fees	Cont
0-24	£1,261	£1,240	23 no	£776	£1,814	5.55%	1.85%
25-49	£1,516	£1,516	1 no	£1,516	£1,516	4.70%	4.03%
50-74	£1,120	£1,113	5 no	£986	£1,217	5.50%	3.34%
75-99	£1,070	£1,104	7 no	£846	£1,240	5.74%	3.03%
100-149	£1,228	£1,215	5 no	£1,136	£1,439	6.03%	4.49%
150-225	£1,193	£1,235	3 no	£1,014	£1,333	3.73%	3.09%
226-500	£952	£952	1 no	£952	£952	2.64%	0.00%
>500	£1,359	£1,359	1 no	£1,359	£1,359	10.15%	7.52%

Table 3: St Helens Dataset Analysis

3.0 CONSTRUCTION COST ASSESSMENTS

- 3.1 Paragraphs 2.10 – 2.42 of the RCC contain details of the methodology adopted in preparing the construction cost assessments. We provided the construction cost assessments for the allocations in Appendix D of the RCC whilst in relation to the generic construction cost assessments, Appendix B of the RCC contained details of the overall rate per sq.m that was assessed.
- 3.2 The consultation responses have sought further detail in relation to these generic costs and we have provided at **Appendix C** a breakdown of the respective rates per sq.m utilised for the respective generic construction cost assessments.
- 3.3 The breakdown also contains details of the professional fees and contingency allowance in each case. We have also shown the adjustment that has been made for scale. BCIS publish scale factors that represent cost variance with development size, with larger developments benefiting from economies of scale and hence pro-rata being cheaper to develop. Details of the scale factors are contained at **Appendix D**. This shows the range of index change with contract size and is readily available from the BCIS website. With reference to this data the reduction shown for a contract of £47m (approx 450 dwellings) is 11%. Overall the development construction costs used in the EVA range from about £650,000 for 5 dwellings to £300,000,000 for the largest allocation at Bold Forest. This range exceeds the range considered by BCIS.
- 3.4 We have been more generous in the application of scale factors to the generic costs which means that the base costs are increased for the smaller developments, and then reduced only by 1.5% for the two largest developments of 100 and 200 dwellings. Contractors profit is excluded from the costs to avoid double counting with the developers profit contained in the financial appraisal.
- 3.5 In reviewing this information it has become apparent that the construction costs for the allocations are in fact overstated. Professional fees have been included at 7.5% throughout rather than at 5%, and the allowance for scale (over 200 dwellings) should have been a reduction of 2.5%, rather than 1% which is the level that was included in the allocations cost assessments. As a result the cost assessments for the allocations are overstated by about 4% (2.5% for fees and 1.5% for scale) with the result that the costs are therefore extremely robust for the purpose of assessing viability.

4.0 COMPARISON WITH DATABASE

- 4.1 For completeness we have also provided a comparison of the construction costs (generic and allocations) contained in the RCC with the costs contained in our database. To enable a comparison on a like for like basis we have used the total costs per sq.m for the generic greenfield sites only, which are then compared directly with the total costs per sq.m excluding abnormals from the database. The generic cost assessments for the brownfield sites include costs for some additional abnormal works so are not directly comparable for the purpose of this exercise.
- 4.2 As noted previously different Developers express costs in different ways and provide different levels of detail, as can be seen from our dataset. We have therefore made comparisons between the total costs of the development including preliminaries, garages, external works within and beyond curtilage, drainage and incoming services with fees and contingencies but excluding any abnormal development costs.
- 4.3 We have provided at **Appendix E** the respective cost data. For each greenfield typology the total rate per sq.m is compared to the average and median total cost per sq.m from the relevant size band in the dataset. For completeness we have also included details of the minimum and maximum cost in that band. The information is provided in relation to the overall dataset and then St Helens only.
- 4.4 In undertaking benchmarking exercises the median rather than the average is typically used, as the median represents the middle value in the range and is essentially unaffected by outliers whether high or low unlike the average.
- 4.5 With reference to the data contained in Appendix E, the generic construction cost assessments contained in the RCC are supported by the costs in the dataset. In the majority of cases the generic costs are close to or in excess of the median both for the overall data set and St Helens only.
- 4.6 The costs for the 200 dwelling typology are c 4% lower than shown by our dataset. We consider that this is not unreasonable. As we have noted above the database includes the costs as presented by Developers and we have not made amendments to these costs notwithstanding that in some cases they have been reduced following discussions with the developer.

- 4.7 Also the range of costs for developments in each category (including at 200 dwellings) is very wide. The fact that some Developers can construct for costs substantially lower than being suggested by other Developers is difficult to reconcile. There will be an element of specification difference that underlies this but that will not, in itself, be sufficient to account for the wide range. Again the very small differences between our assessed costs and the median dataset costs is much less than the range of development costs shown in the dataset at 200 dwellings. Our costs do however fall well within the overall range.
- 4.8 A comparison with developments in St Helens has also been made and the generic costs compared with the average and median values from that dataset. The number of developments is reduced from those in the full dataset and in some categories there is only a single development, namely for the bands 25-49, 226-500 and over 500 hence any comparison in relation to these bands needs to be treated with a degree of caution.
- 4.9 For completeness we have provided at **Appendix F** a comparison of the allocations cost assessments with the data base. We have provided details of the total rate per sq.m excluding abnormals and compared this to the median and average figures from the data base in the respective size band. In all cases the respective cost rate for the allocations exceeds the median figure from the dataset.

5.0 CONCLUSIONS

- 5.1 In response to the request for further information both in relation to the database and the generic construction costs, we have provided details of the overall dataset and then that for St Helens at **Appendix A** and **B** respectively. The data has been presented to respect requirements for confidentiality however is sufficiently detailed to enable assessment of the entries and comparison with the construction cost assessments contained in the RCC.
- 5.2 In addition we have also provided a breakdown of the generic construction cost assessments which is contained at **Appendix C**. For completeness we have provided a comparison of the analysis from the dataset with the construction costs in the RCC (both generic and allocations) and this is contained at **Appendix E** and **F** respectively. With reference to the median and average rates from the respective size bands in the dataset, the construction costs assessments are consistent with these rates and in many cases, particularly for the allocations, exceed the evidence of costs from our database.
- 5.3 The dataset that we have used is based on local market information from market housing schemes in the northwest, typical of the form of development that will take place in St Helens during the plan period on which our testing is based. In the context of the requirements of the PPG, our assessment of costs is based on appropriate data namely evidence of costs reflective of local market conditions. The cost assessments that have been prepared are consistent with the local market data and in some exceed this data, as a result the construction cost assessments contained in the RCC are reasonable and robust for the purpose of assessing viability in St Helens for the purpose of the Local Plan.

Keppie Massie

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KEPPIE MASSIE LTD

DATE: 8 JUNE 2020

Ref: AGM/JA/RC

APPENDIX A

OVERALL DATASET

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																	
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2				
Schemes 0 - 24 dwellings																						
Local	St Helens	10/2017	0 - 24	500 - 1000	£ 656,416	£ -	£ -	£ -	£ -	£ -	£ 25,600	£ 22,200	£ -		3.26%	0.00%	£ 677,783	£ 799				
Local	St Helens	02/2014	0 - 24	500 - 1000	£ 489,913	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		0.00%	0.00%	£ 489,913	£ 776				
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 659,838	£ -	£ -	£ -	£ -	£ -	£ 151,968	£ -	£ -		0.00%	0.00%	£ 659,838	£ 846				
Local	Cheshire East	04/2017	0 - 24	2000 - 2500	£ 1,916,255	£ -	£ -	£ -	£ -	£ -	£ 333,456	£ 172,899	£ 76,651		7.69%	3.41%	£ 2,133,833	£ 969				
Local	St Helens	09/2015	0 - 24	1500 - 2000	£ 1,218,613	£ 137,301	£ -	£ 94,459	£ -	£ -	£ 41,888	£ 205,094	£ 84,867		13.74%	5.69%	£ 1,743,531	£ 1,057				
Local	Cheshire East	12/2017	0 - 24	1000 - 1500	£ 988,906	£ 13,663	£ 33,771	£ 122,964	£ -	£ 13,663	£ -	£ -	£ -		0.00%	0.00%	£ 1,172,967	£ 897				
Landowner	St Helens	12/2017	0 - 24	1000 - 1500	£ 1,022,142	£ -	£ -	£ -	£ 255,536	£ -	£ 19,321	£ 127,768	£ 42,743		9.85%	3.30%	£ 1,449,796	£ 1,030				
Local	Allerdale	04/2017	0 - 24	2500 - 3000	£ 1,761,549	£ 307,110	£ 171,659	£ 139,686	£ 108,954	£ 86,530	£ 346,159	£ 294,104	£ 56,354		10.07%	1.93%	£ 2,889,425	£ 1,051				
Local	St Helens	06/2016	0 - 24	500 - 1000	£ 619,640	£ 6,660	£ -	£ -	£ -	£ 19,979	£ -	£ 24,973	£ -		3.86%	0.00%	£ 671,252	£ 978				
Local	Allerdale	12/2017	0 - 24	1000 - 1500	£ 1,158,313	£ -	£ -	£ -	£ -	£ -	£ 31,579	£ 115,831	£ 88,876		9.73%	7.47%	£ 1,366,009	£ 1,125				
Local	St Helens	04/2016	0 - 24	0 - 500	£ 446,236	£ -	£ -	£ -	£ 6,105	£ -	£ 53,277	£ 27,310	£ 8,925		5.40%	1.77%	£ 485,188	£ 1,055				
Local	Wyre	02/2015	0 - 24	1000 - 1500	£ 1,142,566	£ -	£ 22,721	£ 52,862	£ -	£ 48,689	£ -	£ 56,455	£ 84,209		4.46%	6.65%	£ 1,411,255	£ 1,102				
Local	Hambleton	02/2017	0 - 24	2000 - 2500	£ 2,179,807	£ -	£ 102,358	£ -	£ -	£ -	£ 258,051	£ 149,200	£ 124,333		5.87%	4.89%	£ 2,534,471	£ 1,177				
Regional	St Helens	04/2017	0 - 24	2000 - 2500	£ 2,510,084	£ -	£ -	£ -	£ -	£ -	£ 453,733	£ 177,190	£ 72,029		5.98%	2.43%	£ 2,724,797	£ 1,153				
Local	Sefton	11/2016	0 - 24	1500 - 2000	£ 1,374,051	£ 232,238	£ 128,817	£ -	£ -	£ 73,855	£ 99,297	£ 177,317	£ 107,348		9.29%	5.63%	£ 2,088,270	£ 1,267				
Local	St Helens	10/2016	0 - 24	500 - 1000	£ 940,106	£ -	£ 121,661	£ -	£ -	£ 44,240	£ 50,876	£ 91,411	£ 54,847		7.90%	4.74%	£ 1,249,977	£ 1,255				
Local	St Helens	01/2017	0 - 24	1500 - 2000	£ 1,125,567	£ 322,663	£ 199,341	£ -	£ -	£ 70,898	£ -	£ 85,919	£ 88,550		5.00%	5.15%	£ 1,897,364	£ 1,226				
Regional	St Helens	11/2013	0 - 24	500 - 1000	£ 908,551	£ -	£ 91,674	£ -	£ -	£ -	£ 292,701	£ 93,474	£ 45,427		7.23%	3.51%	£ 1,110,222	£ 1,240				
Local	High Peak	11/2018	0 - 24	1000 - 1500	£ 822,399	£ 138,480	£ 115,400	£ -	£ 23,080	£ 34,620	£ 11,540	£ 123,898	£ 57,700		10.82%	5.04%	£ 1,319,925	£ 1,309				
Landowner	St Helens	07/2016	0 - 24	1000 - 1500	£ 1,422,272	£ -	£ -	£ 218,675	£ -	£ -	£ -	£ 113,782	£ 35,557		6.93%	2.17%	£ 1,792,751	£ 1,231				
Local	St helens	07/2016	0 - 24	1000 - 1500	£ 1,435,948	£ -	£ -	£ 220,777	£ -	£ -	£ 44,141	£ 114,876	£ 35,899		6.75%	2.11%	£ 1,805,948	£ 1,229				
Local	Wyre	03/2016	0 - 24	1000 - 1500	£ 958,622	£ 146,952	£ 154,019	£ 28,455	£ -	£ -	£ 105,851	£ 71,705	£ 74,157		5.14%	5.32%	£ 1,426,358	£ 1,277				
Regional	Wyre	05/2015	0 - 24	1500 - 2000	£ 1,920,854	£ -	£ -	£ 288,128	£ -	£ -	£ 118,480	£ 154,629	£ 66,270		6.64%	2.85%	£ 2,422,815	£ 1,278				
Landowner	South Ribble	04/2018	0 - 24	1500 - 2000	£ 1,897,249	£ -	£ -	£ 189,725	£ -	£ -	£ 249,255	£ 179,310	£ 94,863		7.68%	4.06%	£ 2,338,399	£ 1,309				
Local	Cheshire East	02/2017	0 - 24	1000 - 1500	£ 1,116,882	£ 1,608	£ -	£ 80,399	£ 21,440	£ 67,162	£ 160,799	£ 142,548	£ 72,441		9.84%	5.00%	£ 1,484,949	£ 1,350				
Local	Knowsley	11/2015	0 - 24	1000 - 1500	£ 933,895	£ 62,531	£ -	£ 163,912	£ 142,597	£ 50,621	£ -	£ 192,180	£ -		14.20%	0.00%	£ 1,545,736	£ 1,346				
Local	Wyre	08/2015	0 - 24	1000 - 1500	£ 776,100	£ 167,554	£ -	£ 213,049	£ 69,814	£ -	£ 89,595	£ 82,404	£ -		6.26%	0.00%	£ 1,303,312	£ 1,254				
Regional	Cheshire EAs	11/2015	0 - 24	1000 - 1500	£ 1,745,133	£ -	£ -	£ -	£ -	£ -	£ 433,291	£ 174,274	£ 108,921		8.00%	5.00%	£ 1,978,980	£ 1,360				
Local	Wirral	10/2018	0 - 24	1000 - 1500	£ 1,368,442	£ -	£ -	£ -	£ -	£ -	£ 188,595	£ 108,993	£ 77,852		7.00%	5.00%	£ 1,537,444	£ 1,350				
Landowner	St helens	04/2016	0 - 24	500 - 1000	£ 858,118	£ 41,622	£ 81,580	£ -	£ -	£ -	£ 131,527	£ 76,813	£ 24,576		6.90%	2.21%	£ 1,072,222	£ 1,339				
Local	Wyre	06/2016	0 - 24	2500 - 3000	£ 2,560,495	£ -	£ -	£ -	£ 512,099	£ -	£ 321,857	£ 256,050	£ 76,815		7.54%	2.26%	£ 3,379,142	£ 1,349				
Local	St Helens	06/2013	0 - 24	500 - 1000	£ 725,903	£ 15,915	£ 3,316	£ -	£ -	£ 15,915	£ -	£ 22,547	£ -		2.96%	0.00%	£ 783,596	£ 1,276				
Local	St Helens	11/2013	0 - 24	0 - 500	£ 513,320	£ -	£ -	£ -	£ -	£ -	£ 10,477	£ -	£ -		0.00%	0.00%	£ 513,320	£ 1,252				
Local	Knowsley	11/2015	0 - 24	1000 - 1500	£ 933,895	£ 62,531	£ 163,912	£ -	£ 142,597	£ 50,621	£ -	£ 192,180	£ -		14.20%	0.00%	£ 1,545,736	£ 1,439				
Landowner	Cheshire East	10/2015	0 - 24	1000 - 1500	£ 1,133,061	£ 165,503	£ -	£ -	£ 216,975	£ -	£ -	£ 85,262	£ 94,304		5.63%	6.22%	£ 1,700,410	£ 1,422				
Local	Lancaster	10/2015	0 - 24	1500 - 2000	£ 1,781,725	£ -	£ -	£ 379,704	£ 164,771	£ 79,161	£ 597,130	£ 246,764	£ 149,580		8.22%	4.98%	£ 2,732,729	£ 1,449				
Landowner	Lancaster	06/2017	0 - 24	2000 - 2500	£ 2,436,778	£ -	£ 131,393	£ 150,128	£ 154,536	£ 60,431	£ 631,909	£ 127,016	£ 141,209		3.56%	3.96%	£ 3,158,088	£ 1,393				
Local	Cheshire East	09/2014	0 - 24	0 - 500	£ 600,558	£ -	£ -	£ -	£ -	£ -	£ -	£ 63,059	£ 30,027		10.50%	5.00%	£ 696,797	£ 1,548				
Regional	Cheshire EAs	01/2014	0 - 24	1500 - 2000	£ 1,989,587	£ -	£ 364,046	£ -	£ 95,965	£ 51,733	£ 732,829	£ 187,105	£ 112,717		5.79%	3.49%	£ 2,738,261	£ 1,467				
Local	St Helens	10/2016	0 - 24	1000 - 1500	£ 1,953,485	£ -	£ -	£ -	£ -	£ -	£ 196,869	£ 160,967	£ 58,605		7.49%	2.73%	£ 2,156,940	£ 1,526				
Landowner	St Helens	09/2016	0 - 24	1500 - 2000	£ 2,069,469	£ -	£ 212,121	£ -	£ -	£ -	£ 57,326	£ 165,099	£ 51,737		7.06%	2.21%	£ 2,496,674	£ 1,529				
Local	Sefton	06/2014	0 - 24	1500 - 2000	£ 2,309,539	£ -	£ -	£ -	£ -	£ -	£ 428,709	£ 273,825	£ 241,686		10.00%	8.83%	£ 2,764,725	£ 1,687				
Local	St Helens	07/2014	0 - 24	500 - 1000	£ 842,520	£ -	£ -	£ -	£ 53,315	£ -	£ 65,883	£ 98,650	£ -		10.26%	0.00%	£ 987,727	£ 1,598				
Local	St Helens	12/2012	0 - 24	500 - 1000	£ 566,151	£ 201,082	£ 16,312	£ -	£ -	£ 48,417	£ -	£ -	£ -		0.00%	0.00%	£ 831,962	£ 1,454				
Local	Fylde	11/2018	0 - 24	1000 - 1500	£ 1,977,353	£ -	£ -	£ -	£ -	£ -	£ -	£ 24,030	£ 71,809		1.22%	3.63%	£ 2,074,065	£ 1,605				
Regional	Knowsley	02/2014	0 - 24	500 - 1000	£ 921,679	£ 209,803	£ 163,416	£ 70,502	£ -	£ 123,493	£ 185,107	£ -	£ 24,266		0.00%	1.45%	£ 1,510,476	£ 1,602				
Local	South Ribble	02/2016	0 - 24	1000 - 1500	£ 1,673,667	£ 13,055	£ -	£ 80,154	£ -	£ 59,595	£ 27,798	£ 40,659	£ -		2.19%	0.00%	£ 1,86					

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																		
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2					
Schemes 25 - 49 dwellings																							
National	Sefton	04/2017	24 - 49	2500 - 3000	£ 2,322,131	£ -	£ -	£ -	£ -	£ -	£ 480,539	£ 196,187	£ 140,133		7.00%	5.00%	£ 2,608,914	£ 1,006					
Landowner	Wyre	01/2017	24 - 49	4000 - 4500	£ 2,720,706	£ 504,161	£ 274,558	£ -	£ -	£ 210,067	£ 823,194	£ 183,179	£ 129,120		4.04%	2.85%	£ 3,969,344	£ 976					
National	Knowsley	09/2012	24 - 49	3000 - 3500	£ 3,266,228	£ -	£ -	£ -	£ -	£ -	£ 1,073,375	£ 261,298	£ 97,987		6.02%	2.26%	£ 3,541,086	£ 1,098					
Local	Hyndburn	01/2017	24 - 49	2000 - 2500	£ 2,430,142	£ -	£ -	£ -	£ -	£ -	£ 989,879	£ 255,164	£ 121,507		7.46%	3.55%	£ 2,704,232	£ 1,136					
Landowner	High Peak	12/2015	24 - 49	2500 - 3000	£ 2,228,020	£ -	£ -	£ -	£ 646,712	£ -	£ 766,202	£ 286,873	£ 111,401		7.88%	3.06%	£ 3,196,123	£ 1,142					
National	Hyndburn	12/2017	24 - 49	4000 - 4500	£ 4,493,308	£ -	£ -	£ -	£ -	£ -	£ 911,801	£ 351,332	£ 108,102		6.50%	2.00%	£ 4,881,081	£ 1,130					
National	Wyre	07/2018	24 - 49	3000 - 3500	£ 2,728,043	£ -	£ -	£ 471,043	£ -	£ 116,500	£ 319,400	£ 163,683	£ 81,841		4.50%	2.25%	£ 3,542,898	£ 1,116					
Landowner	High Peak	04/2014	24 - 49	2000 - 2500	£ 2,112,138	£ -	£ 71,247	£ -	£ 338,685	£ 90,762	£ 374,394	£ 289,014	£ 224,042		9.68%	7.50%	£ 3,080,546	£ 1,236					
Landowner	Wyre	03/2016	24 - 49	3500 - 4000	£ 3,890,093	£ -	£ -	£ -	£ -	£ -	£ 400,640	£ 214,537	£ 300,351		5.00%	7.00%	£ 4,370,520	£ 1,193					
Landowner	Fylde	05/2017	24 - 49	2500 - 3000	£ 1,989,661	£ 382,556	£ 297,437	£ 228,577	£ -	£ 143,458	£ 382,848	£ 202,223	£ 99,484		5.91%	2.91%	£ 3,314,884	£ 1,158					
Regional	Wyre	10/2018	24 - 49	2500 - 3000	£ 2,083,258	£ 275,562	£ 551,087	£ 338,588	£ -	£ -	£ 521,518	£ 178,092	£ 118,443		4.72%	3.14%	£ 3,508,832	£ 1,174					
Regional	South Ribble	06/2016	24 - 49	4000 - 4500	£ 4,388,681	£ -	£ -	£ -	£ -	£ -	£ 490,565	£ 263,320	£ 209,285		5.40%	4.29%	£ 4,823,929	£ 1,202					
National	West Lancs	05/2013	24 - 49	2500 - 3000	£ 2,813,393	£ -	£ -	£ 278,650	£ -	£ -	£ 660,377	£ 225,071	£ 140,670		6.00%	3.75%	£ 3,400,370	£ 1,208					
National	West Lancs	08/2016	24 - 49	3000 - 3500	£ 3,049,772	£ -	£ -	£ 446,617	£ 130,703	£ -	£ 238,855	£ 182,987	£ 152,488		4.73%	3.94%	£ 3,948,612	£ 1,198					
Regional	High Peak	12/2014	24 - 49	3000 - 3500	£ 3,706,685	£ -	£ -	£ -	£ -	£ -	£ 493,676	£ 311,361	£ 185,334		7.41%	4.41%	£ 4,157,127	£ 1,237					
Regional	Knowsley	09/2013	24 - 49	4000 - 4500	£ 4,529,650	£ 313,042	£ -	£ -	£ -	£ -	£ 743,788	£ 362,372	£ 226,483		6.49%	4.05%	£ 5,365,882	£ 1,240					
Local	Hyndburn	10/2018	24 - 49	3500 - 4000	£ 4,227,152	£ -	£ -	£ -	£ -	£ -	£ 859,591	£ 406,939	£ 211,357		8.00%	4.16%	£ 4,755,016	£ 1,271					
Regional	Cheshire East	11/2016	24 - 49	2000 - 2500	£ 1,511,078	£ 249,938	£ 528,454	£ 283,563	£ -	£ -	£ 357,283	£ 152,476	£ 92,377		5.20%	3.15%	£ 2,792,253	£ 1,227					
Local	High Peak	08/2018	24 - 49	2500 - 3000	£ 3,276,245	£ -	£ -	£ -	£ -	£ -	£ 2,111,248	£ 261,553	£ 174,368		4.85%	3.24%	£ 3,546,486	£ 1,238					
Local	West Lancs	08/2016	49 - 74	4500 - 5000	£ 5,342,629	£ -	£ -	£ -	£ -	£ -	£ 659,189	£ 420,127	£ 300,091		7.00%	5.00%	£ 6,002,444	£ 1,296					
Local	Wirral	03/2018	24 - 49	4000 - 4500	£ 5,075,744	£ -	£ -	£ -	£ -	£ -	£ 1,058,851	£ 460,094	£ 306,730		7.50%	5.00%	£ 5,729,246	£ 1,334					
Landowner	Knowsley	11/2016	24 - 49	3500 - 4000	£ 4,157,646	£ -	£ -	£ 114,057	£ -	£ -	£ -	£ 415,765	£ 207,584		9.73%	4.86%	£ 4,915,256	£ 1,381					
Local	Sefton	09/2014	24 - 49	3000 - 3500	£ 3,192,244	£ -	£ 292,602	£ -	£ 335,166	£ 137,121	£ 321,159	£ 299,695	£ 159,616		7.01%	3.73%	£ 4,392,307	£ 1,335					
National	Wirral	03/2018	24 - 49	2500 - 3000	£ 1,697,082	£ 602,437	£ 349,507	£ 426,902	£ -	£ 117,870	£ 36,906	£ 141,891	£ -		4.39%	0.00%	£ 3,334,069	£ 1,267					
Local	Wyre	08/2014	24 - 49	2500 - 3000	£ 2,229,778	£ 433,151	£ 445,956	£ 338,880	£ -	£ -	£ 362,847	£ 138,688	£ 79,351		3.64%	2.08%	£ 3,647,655	£ 1,296					
Local	Fylde	03/2018	24 - 49	3000 - 3500	£ 2,692,003	£ 523,712	£ -	£ 863,367	£ -	£ 175,888	£ 791,259	£ 280,152	£ 218,213		5.55%	4.32%	£ 4,685,406	£ 1,356					
National	Liverpool	04/2013	24 - 49	4000 - 4500	£ 2,905,368	£ 1,000,830	£ 502,326	£ 445,578	£ 240,787	£ 237,190	£ 497,422	£ 290,394	£ 61,112		4.98%	1.05%	£ 5,656,374	£ 1,359					
Local	Wirral	07/2018	24 - 49	3500 - 4000	£ 5,115,158	£ -	£ -	£ -	£ -	£ -	£ -	£ 613,739	£ 255,858		12.00%	5.00%	£ 6,015,453	£ 1,532					
Landowner	Sefton	03/2016	24 - 49	3000 - 3500	£ 3,823,196	£ 143,612	£ -	£ -	£ 552,353	£ -	£ 157,421	£ 350,744	£ 233,829		7.50%	5.00%	£ 5,101,003	£ 1,493					
Local	St Helens	07/2012	24 - 49	1500 - 2000	£ 2,091,065	£ 147,377	£ -	£ 231,592	£ -	£ -	£ 666,704	£ 147,377	£ 126,323		4.70%	4.03%	£ 2,690,232	£ 1,516					
Regional	Hyndburn	12/2017	24 - 49	2500 - 3000	£ 2,577,629	£ -	£ 119,771	£ 1,003,881	£ -	£ -	£ 1,133,146	£ 156,944	£ -		3.25%	0.00%	£ 3,821,439	£ 1,442					
Local	Allerdale	05/2017	24 - 49	4000 - 4500	£ 4,491,336	£ 167,819	£ 602,728	£ 145,033	£ -	£ 332,879	£ 835,235	£ 555,121	£ -		8.44%	0.00%	£ 6,224,398	£ 1,517					
Local	Fylde	11/2013	24 - 49	2000 - 2500	£ 2,745,682	£ -	£ 701,487	£ -	£ -	£ -	£ 538,059	£ 152,716	£ -		3.83%	0.00%	£ 3,579,267	£ 1,490					
Regional	Fylde	02/2017	24 - 49	5000 - 5500	£ 4,921,346	£ 635,488	£ 438,735	£ 1,230,965	£ -	£ 157,870	£ 118,818	£ 193,678	£ -		2.58%	0.00%	£ 7,575,014	£ 1,486					
Local	Allerdale	02/2013	24 - 49	2000 - 2500	£ 3,255,784	£ -	£ -	£ 463,100	£ -	£ -	£ -	£ 62,464	£ -		1.68%	0.00%	£ 3,781,347	£ 1,723					
																	Average	£ 1,285	35 no Median £1,240				
Schemes 50 - 74 dwellings																							
National	Rochdale	01/2014	49 - 74	8500 - 9000	£ 4,958,498	£ 1,120,514	£ 630,054	£ 471,684	£ -	£ 236,034	£ 2,560,554	£ 274,019	£ -		2.75%	0.00%	£ 7,620,480	£ 859					
Regional	Allerdale	10/2017	49 - 74	7500 - 8000	£ 5,928,273	£ -	£ -	£ 833,321	£ -	£ -	£ 2,151,566	£ 327,404	£ 287,606		3.67%	3.23%	£ 7,236,160	£ 943					
National	St Helens	05/2017	49 - 74	3500 - 4000	£ 2,759,182	£ -	£ -	£ 41,338	£ 262,166	£ 127,035	£												

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																	
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2				
Schemes 75 - 99 dwellings																						
Regional	St helens	05/2017	74 - 99	7500 - 8000	£ 4,933,060	£ 533,549	£ 157,778	£ 490,586	£ 5,313	£ -	£ 2,251,775	£ 394,645	£ 246,566		4.71%	2.95%	£ 6,597,531	£ 855				
National	St Helens	12/2017	74 - 99	6500 - 7000	£ 3,159,998	£ 823,826	£ 889,043	£ -	£ 402,024	£ 202,870	£ 752,023	£ 261,477	£ -		4.20%	0.00%	£ 5,707,674	£ 846				
Landowner	Knowsley	04/2017	74 - 99	9000 - 9500	£ 7,955,308	£ -	£ -	£ 796,027	£ -	£ -	£ 2,346,042	£ 477,319	£ 397,765		4.30%	3.58%	£ 9,454,913	£ 1,021				
Promoter	St Helens	08/2017	74 - 99	6500 - 7000	£ 6,176,745	£ -	£ -	£ 308,837	£ 106,265	£ -	£ 620,832	£ 518,847	£ 216,381		7.19%	3.00%	£ 7,278,016	£ 1,090				
National	St Helens	04/2015	74 - 99	6500 - 7000	£ 6,663,527	£ -	£ -	£ -	£ -	£ -	£ 750,071	£ 481,884	£ 222,408		6.50%	3.00%	£ 7,309,556	£ 1,104				
National	Cheshire EAsT	01/2016	74 - 99	8000 - 8500	£ 8,476,678	£ -	£ -	£ -	£ -	£ -	£ 1,776,227	£ 717,703	£ 512,645		7.00%	5.00%	£ 9,523,548	£ 1,163				
National	St Helens	04/2014	74 - 99	6500 - 7000	£ 7,446,906	£ -	£ -	£ -	£ -	£ -	£ 860,661	£ 671,345	£ 419,590		8.08%	5.05%	£ 8,455,216	£ 1,212				
National	St Helens	11/2013	74 - 99	6500 - 7000	£ 6,529,066	£ -	£ 859,113	£ -	£ -	£ -	£ 2,247,969	£ 391,863	£ 368,189		4.07%	3.82%	£ 7,982,402	£ 1,155				
Regional	South Ribble	03/2018	74 - 99	8000 - 8500	£ 6,998,145	£ -	£ 355,837	£ 1,366,566	£ -	£ 227,438	£ 1,190,982	£ 460,796	£ 268,454		4.54%	2.65%	£ 9,602,341	£ 1,165				
National	Liverpool	09/2014	74 - 99	8500 - 9000	£ 9,523,170	£ -	£ -	£ -	£ -	£ -	£ 2,096,413	£ 813,371	£ 580,979		7.00%	5.00%	£ 10,699,281	£ 1,242				
Regional	Cheshire East	09/2017	74 - 99	7000 - 7500	£ 8,175,207	£ -	£ -	£ -	£ -	£ -	£ 1,273,450	£ 490,512	£ 245,256		5.19%	2.60%	£ 8,822,828	£ 1,206				
Regional	Cheshire East	11/2016	74 - 99	7500 - 8000	£ 8,905,448	£ -	£ -	£ -	£ -	£ -	£ 1,631,383	£ 848,100	£ 445,273		8.05%	4.23%	£ 10,028,863	£ 1,267				
Regional	Cheshire EAsT	11/2016	74 - 99	8500 - 9000	£ 8,092,831	£ -	£ -	£ 1,515,682	£ 129,813	£ 234,228	£ 2,760,835	£ 771,201	£ 404,662		6.06%	3.18%	£ 10,912,663	£ 1,229				
National	West Lancs	11/2016	74 - 99	9500 - 10000	£ 11,096,783	£ -	£ -	£ -	£ -	£ -	£ 1,455,513	£ 878,661	£ 627,615		7.00%	5.00%	£ 12,467,236	£ 1,265				
Landowner	St Helens	10/2016	74 - 99	7000 - 7500	£ 5,958,298	£ 1,011,448	£ 435,833	£ -	£ 906,074	£ -	£ 516,118	£ 476,664	£ 297,915		5.40%	3.37%	£ 9,056,092	£ 1,240				
National	Wirral	01/2015	74 - 99	5500 - 6000	£ 3,907,530	£ 932,312	£ 919,230	£ 581,051	£ -	£ 347,778	£ 650,487	£ 447,068	£ 133,315		6.09%	1.82%	£ 7,224,240	£ 1,282				
National	West Lancs	10/2013	74 - 99	8500 - 9000	£ 8,123,221	£ -	£ -	£ 2,462,092	£ -	£ 369,314	£ 2,451,721	£ 649,857	£ 406,161		4.85%	3.03%	£ 11,833,611	£ 1,335				
National	Knowsley	06/2016	74 - 99	8500 - 9000	£ 11,238,425	£ -	£ -	£ -	£ -	£ -	£ 2,117,380	£ 934,906	£ 667,790		7.00%	5.00%	£ 12,626,370	£ 1,408				
Local	High Peak	05/2017	74 - 99	10000 - 10500	£ 11,259,305	£ 1,286,402	£ -	£ 462,736	£ -	£ 272,179	£ 851,621	£ 427,967	£ -		3.03%	0.00%	£ 13,682,799	£ 1,364				
																			19 no			
															5.80%	3.28%	Average	£ 1,189	Median £1,212			
Schemes 100 - 149 dwellings																						
National	Sefton	05/2016	99 - 124	8500 - 9000	£ 3,285,598	£ 1,013,827	£ 528,796	£ 753,830	£ -	£ 358,576	£ 3,167,054	£ 249,139	£ -		2.74%	0.00%	£ 6,103,131	£ 713				
Landowner	West Lancs	06/2017	99 - 124	10500 - 11000	£ 9,304,442	£ -	£ -	£ -	£ -	£ -	£ 2,552,972	£ 1,106,099	£ 930,445		9.33%	7.85%	£ 10,970,613	£ 1,009				
National	High Peak	02/2016	124 - 149	11500 - 12000	£ 7,128,193	£ 1,091,345	£ -	£ 1,967,043	£ -	£ -	£ 2,277,833	£ 909,524	£ 623,225		7.30%	5.00%	£ 11,476,391	£ 977				
Regional	Wyre	12/2017	124 - 149	13000 - 13500	£ 6,812,235	£ 1,275,550	£ 3,301,686	£ -	£ -	£ 517,319	£ 553,546	£ 121,191	£ 404,881		0.97%	3.25%	£ 12,413,256	£ 948				
Promoter	CWAC	10/2017	99 - 124	10500 - 11000	£ 9,355,300	£ -	£ -	£ 1,139,677	£ -	£ -	£ 144,907	£ 748,424	£ 280,659		7.03%	2.64%	£ 11,529,517	£ 1,052				
Promoter	Sefton	10/2017	124 - 149	12000 - 12500	£ 11,889,344	£ -	£ -	£ -	£ -	£ -	£ 3,846,912	£ 741,060	£ 594,467		4.71%	3.78%	£ 12,919,537	£ 1,042				
National	Sefton	02/2015	99 - 124	9000 - 9500	£ 7,948,248			£ 1,300,045		£ 277,710	£ 1,361,594	£ 407,348	£ 226,808		3.74%	2.08%	£ 10,088,277	£ 1,068				
National	St Helens	05/2016	124 - 149	10500 - 11000	£ 10,964,592	£ -	£ -	£ -	£ -	£ -	£ 1,420,274	£ 848,303	£ 652,541		6.85%	5.27%	£ 12,332,892	£ 1,136				
National	St Helens	01/2017	124 - 149	13000 - 13500	£ 11,159,448	£ -	£ 2,413,671	£ -	£ -	£ 372,869	£ 3,901,720	£ 732,165	£ 697,300		4.10%	3.91%	£ 15,085,307	£ 1,146				
Regional	Wyre	04/2014	99 - 124	9000 - 9500	£ 9,899,489	£ -	£ -	£ -	£ -	£ -	£ 2,456,742	£ 989,731	£ 618,582		8.01%	5.01%	£ 11,227,725	£ 1,218				
National	St Helens	05/2018	99 - 124	7500 - 8000	£ 8,108,972	£ -	£ -	£ -	£ -	£ -	£ 946,551	£ 636,166	£ 454,404		7.03%	5.02%	£ 9,114,133	£ 1,215				
National	CWAC	05/2016	124 - 149	11500 - 12000	£ 9,723,080	£ -	£ 1,684,770	£ 1,295,723	£ -	£ -	£ 1,193,241	£ 486,154	£ 486,154		3.50%	3.50%	£ 13,607,943	£ 1,158				
National	St Helens	04/2018	99 - 124	10000 - 10500	£ 10,768,088	£ -	£ -	£ 185,892	£ -	£ -	£ 2,579,092	£ 949,834	£ 678,452		7.02%	5.01%	£ 12,310,496	£ 1,224				
National	High Peak	10/2018	99 - 124	10500 - 11000	£ 12,044,421	£ -	£ -	£ -	£ -	£ -	£ 1,600,832	£ 918,515	£ 656,082		6.73%	4.81%	£ 13,473,273	£ 1,242				
National	West Lancs	09/2017	124 - 149	15000 - 15500	£ 16,824,302	£ -	£ 336,450	£ -	£ -	£ -	£ 4,715,494	£ 1,539,834	£ 1,099,881		7.04%	5.03%	£ 19,292,198	£ 1,253				
National	Rochdale	01/2014	99 - 124	9000 - 9500	£ 6,733,873	£ 1,575,733	£ 578,803	£ 373,847	£ 556,848	£ 495,864	£ 691,459	£ 519,773	£ 568,666		4.72%	5.17%	£ 11,360,196	£ 1,262				
Regional	Knowsley	08/2018	124 - 149	14500 - 15000	£ 17,563,419	£ -	£ -	£ -	£ -	£ -	£ 3,135,103	£ 1,448,897	£ 1,046,532		7.00%	5.06%	£ 19,743,039	£ 1,334				
National	Wirral	08/2016	99 - 124	8500 - 9000	£ 6,457,141	£ 1,727,804	£ 1,149,182	£ 754,141	£ 392,555	£ 4												

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals														
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2	
Schemes 225 - 499 dwellings																			
Landowner	St Helens	06/2015	374 - 399	26500 - 27000	£ 18,575,632	£ 2,056,284	£ -	£ 4,285,004	£ -	£ -	£ 6,120,175	£ 820,907	£ -		2.64%	0.00%	£ 25,575,954	£ 952	
National	CWAC	04/2016	399 - 424	32500 - 33000	£ 19,752,761	£ 3,950,593	£ 3,159,331	£ 3,952,433	£ -	£ 1,345,051	£ 4,218,043	£ 1,347,707	£ -		3.70%	0.00%	£ 33,351,609	£ 1,025	
Landowner	Cheshire East	03/2016	374 - 399	34500 - 35000	£ 35,388,698	£ -	£ -	£ -	£ -	£ -	£ 4,810,028	£ 2,831,096	£ 1,769,435		7.04%	4.40%	£ 39,548,452	£ 1,132	
National	West Lancs	02/2016	299 - 324	31000 - 31500	£ 27,925,088	£ -	£ 738,458	£ 3,475,262	£ 1,385,804	£ -	£ 8,745,300	£ 1,480,160	£ 1,117,004		3.50%	2.64%	£ 35,615,465	£ 1,148	
Local	Fylde	02/2018	249 - 274	27000 - 27500	£ 26,996,498	£ 1,258,438	£ 4,049,475	£ -	£ -	£ -	£ 2,118,491	£ 2,041,390	£ 973,637		5.93%	2.83%	£ 35,188,069	£ 1,299	
National	Staffordshire Moorlands	07/2018	299 - 324	24500 - 25000	£ 22,985,149	£ 1,916,129	£ 455,400	£ 3,706,736	£ -	£ 798,387	£ 2,148,087	£ 1,641,872	£ -		5.13%	0.00%	£ 31,393,492	£ 1,257	
Landowner	Preston	01/2017	449 - 474	42000 - 42500	£ 51,872,729	£ -	£ -	£ -	£ -	£ -	£ -	£ 2,593,636	£ 1,815,546		5.00%	3.50%	£ 56,372,688	£ 1,341	
																			7 no
															4.71%	1.91%	Average	£ 1,171	Median £1,148
Schemes >500 dwellings																			
National	Allerdale	06/2014	649 - 674	53000 - 53500	£ 42,519,818	£ -	£ -	£ 7,162,654	£ -	£ 2,408,620	£ 10,859,491	£ 2,320,247	£ -		3.69%	0.00%	£ 54,011,077	£ 1,015	
National	Alladale	07/2014	649 - 674	55000 - 55500	£ 46,766,078	£ -	£ 7,218,394	£ -	£ -	£ 2,427,364	£ 10,944,001	£ 2,338,304	£ -		3.47%	0.00%	£ 58,370,212	£ 1,054	
National	South Ribble	11/2018	949 - 974	89000 - 89500	£ 76,955,145	£ -	£ 15,542,062	£ -	£ -	£ 2,925,106	£ 16,942,072	£ 5,722,031	£ 3,412,180		5.09%	3.04%	£ 103,326,848	£ 1,157	
National	CWAC	02/2017	1299 - 1324	146500 - 147000	£ 129,585,088	£ -	£ 12,546,193	£ 18,009,004	£ -	£ 5,249,869	£ -	£ 9,509,934	£ 8,745,005		5.75%	5.29%	£ 184,147,931	£ 1,253	
National	St Helens	04/2013	899 - 924	87500 - 88000	£ 100,875,457	£ -	£ -	£ -	£ -	£ -	£ 6,462,256	£ 10,894,550	£ 8,070,037		10.15%	7.52%	£ 119,468,061	£ 1,359	
																			5 no
															5.63%	3.17%	Average	£ 1,200	Median £1,157

APPENDIX B

ST HELENS ONLY DATASET

APPENDIX B

DATA BASE PROJECT ANALYSIS - ST HELENS SCHEMES

Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	UPDATED COSTS											Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals)	
					Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies							
Schemes 0 - 24 dwellings																				
Local	St Helens	10/2017	0 - 24	500 - 1000	£ 656,416	£ -	£ -	£ -	£ -	£ -	£ 25,600	£ 22,200	£ -		3.26%	0.00%	£ 677,783	£ 799		
Local	St Helens	02/2014	0 - 24	500 - 1000	£ 489,913	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		0.00%	0.00%	£ 489,913	£ 776		
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 659,838	£ -	£ -	£ -	£ -	£ -	£ 151,968	£ -	£ -		0.00%	0.00%	£ 659,838	£ 846		
Local	St Helens	09/2015	0 - 24	1500 - 2000	£ 1,218,613	£ 137,301	£ -	£ 94,459	£ -	£ -	£ 41,888	£ 205,094	£ 84,867		13.74%	5.69%	£ 1,743,531	£ 1,057		
Landowner	St Helens	12/2017	0 - 24	1000 - 1500	£ 1,022,142	£ -	£ -	£ -	£ 255,536	£ -	£ 19,321	£ 127,768	£ 42,743		9.85%	3.30%	£ 1,449,796	£ 1,030		
Local	St Helens	06/2016	0 - 24	500 - 1000	£ 619,640	£ 6,660	£ -	£ -	£ -	£ -	£ 19,979	£ -	£ 24,973		3.86%	0.00%	£ 671,252	£ 978		
Local	St Helens	04/2016	0 - 24	0 - 500	£ 446,236	£ -	£ -	£ -	£ 6,105	£ -	£ 53,277	£ 27,310	£ 8,925		5.40%	1.77%	£ 485,188	£ 1,055		
Regional	St Helens	04/2017	0 - 24	2000 - 2500	£ 2,510,084	£ -	£ -	£ -	£ -	£ -	£ 453,733	£ 177,190	£ 72,029		5.98%	2.43%	£ 2,724,797	£ 1,153		
Local	St Helens	10/2016	0 - 24	500 - 1000	£ 940,106	£ -	£ 121,661	£ -	£ -	£ 44,240	£ 50,876	£ 91,411	£ 54,847		7.90%	4.74%	£ 1,249,977	£ 1,255		
Local	St Helens	01/2017	0 - 24	1500 - 2000	£ 1,125,567	£ 322,663	£ 199,341	£ -	£ -	£ 70,898	£ -	£ 85,919	£ 88,550		5.00%	5.15%	£ 1,897,364	£ 1,226		
Regional	St Helens	11/2013	0 - 24	500 - 1000	£ 908,551	£ -	£ 91,674	£ -	£ -	£ -	£ 292,701	£ 93,474	£ 45,427		7.23%	3.51%	£ 1,110,222	£ 1,240		
Landowner	St Helens	07/2016	0 - 24	1000 - 1500	£ 1,422,272	£ -	£ -	£ 218,675	£ -	£ -	£ -	£ 113,782	£ 35,557		6.93%	2.17%	£ 1,792,751	£ 1,231		
Local	St helens	07/2016	0 - 24	1000 - 1500	£ 1,435,948	£ -	£ -	£ 220,777	£ -	£ -	£ 44,141	£ 114,876	£ 35,899		6.75%	2.11%	£ 1,805,948	£ 1,229		
Landowner	St helens	04/2016	0 - 24	500 - 1000	£ 858,118	£ 41,622	£ 81,580	£ -	£ -	£ -	£ 131,527	£ 76,813	£ 24,576		6.90%	2.21%	£ 1,072,222	£ 1,339		
Local	St Helens	06/2013	0 - 24	500 - 1000	£ 725,903	£ 15,915	£ 3,316	£ -	£ -	£ 15,915	£ -	£ 22,547	£ -		2.96%	0.00%	£ 783,596	£ 1,276		
Local	St Helens	11/2013	0 - 24	0 - 500	£ 513,320	£ -	£ -	£ -	£ -	£ -	£ 10,477	£ -	£ -		0.00%	0.00%	£ 513,320	£ 1,252		
Local	St Helens	10/2016	0 - 24	1000 - 1500	£ 1,953,485	£ -	£ -	£ -	£ -	£ -	£ 196,869	£ 160,967	£ 58,605		7.49%	2.73%	£ 2,156,940	£ 1,526		
Landowner	St Helens	09/2016	0 - 24	1500 - 2000	£ 2,069,469	£ -	£ 212,121	£ -	£ -	£ -	£ 57,326	£ 165,099	£ 51,737		7.06%	2.21%	£ 2,496,674	£ 1,529		
Local	St Helens	07/2014	0 - 24	500 - 1000	£ 842,520	£ -	£ -	£ -	£ 53,315	£ -	£ 65,883	£ 98,650	£ -		10.26%	0.00%	£ 987,727	£ 1,598		
Local	St Helens	12/2012	0 - 24	500 - 1000	£ 566,151	£ 201,082	£ 16,312	£ -	£ -	£ 48,417	£ -	£ -	£ -		0.00%	0.00%	£ 831,962	£ 1,454		
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 1,007,060	£ 277,966	£ 88,551	£ 83,225	£ 75,480	£ 60,663	£ 190,473	£ 113,801	£ 80,087		6.38%	4.49%	£ 1,770,690	£ 1,814		
Landowner	St Helens	10/2011	0 - 24	500 - 1000	£ 928,557	£ -	£ -	£ -	£ -	£ 49,126	£ 14,036	£ 50,880	£ -		5.13%	0.00%	£ 1,027,843	£ 1,742		
Local	St Helens	03/2013	0 - 24	500 - 1000	£ 925,758	£ 80,256	£ 47,753	£ 88,951	£ 61,530	£ 58,855	£ 11,905	£ 71,549	£ -		5.61%	0.00%	£ 1,333,983	£ 1,767		
																			23 no	
															5.55%	1.85%	Average	£ 1,261	Median £1,240	
Schemes 25 - 49 dwellings																				
Local	St Helens	07/2012	24 - 49	1500 - 2000	£ 2,091,065	£ 147,377	£ -	£ 231,592	£ -	£ -	£ 666,704	£ 147,377	£ 126,323		4.70%	4.03%		£ 1,516		
																			1 no	
															4.70%	4.03%	Average	£ 1,516	Median £1,516	
Schemes 50 - 74 dwellings																				
National	St Helens	05/2017	49 - 74	3500 - 4000	£ 2,759,182	£ -	£ -	£ 41,338	£ 262,166	£ 127,035	£ 137,507	£ 165,551	£ 137,960		4.98%	4.15%	£ 3,487,270	£ 986		
National	St Helens	04/2016	49 - 74	4000 - 4500	£ 3,478,393	£ -	£ 414,448	£ -	£ 231,975	£ -	£ 534,586	£ 208,703	£ 173,919		4.48%	3.73%	£ 4,470,436	£ 1,113		
National	St Helens	11/2014	49 - 74	3500 - 4000	£ 3,460,724	£ -	£ -	£ 209,776	£ 112,632	£ 158,917	£ 614,495	£ 218,026	£ 173,036		4.78%	3.80%	£ 4,287,535	£ 1,128		
Regional	St Helens	12/2013	49 - 74	5000 - 5500	£ 5,294,512	£ -	£ -	£ -	£ -	£ -	£ 602,623	£ 367,856	£ -		6.24%	0.00%	£ 5,624,777	£ 1,112		
Local	St Helens	04/2018	49 - 74	5000 - 5500	£ 5,658,120	£ -	£ -	£ -	£ -	£ -	£ 859,759	£ 456,252	£ 325,894		7.00%	5.00%	£ 6,356,898	£ 1,217		
																			5 no	
															5.50%	3.34%	Average	£ 1,120	Median £1,113	
Schemes 75 - 99 dwellings																				
Regional	St helens	05/2017	74 - 99	7500 - 8000	£ 4,933,060	£ 533,549	£ 157,778	£ 490,586	£ 5,313	£ -	£ 2,251,775	£ 394,645	£ 246,566		4.71%	2.95%	£ 6,597,531	£ 855		
National	St Helens	12/2017	74 - 99	6500 - 7000	£ 3,159,998	£ 823,826	£ 889,043	£ -	£ 402,024	£ 202,870	£ 752,023	£ 261,477	£ -		4.20%	0.00%	£ 5,707,674	£ 846		
Promoter	St Helens	08/2017	74 - 99	6500 - 7000	£ 6,176,745	£ -	£ -	£ 308,837	£ 106,265	£ -	£ 620,832	£ 518,847	£ 216,381		7.19%	3.00%	£ 7,278,016	£ 1,090		
National	St Helens	04/2015	74 - 99	6500 - 7000	£ 6,663,527	£ -	£ -	£ -	£ -	£ -	£ 750,071	£ 481,884	£ 222,408		6.50%	3.00%	£ 7,309,556	£ 1,104		
National	St Helens	04/2014	74 - 99	6500 - 7000	£ 7,446,906	£ -	£ -	£ -	£ -	£ -	£ 860,661	£ 671,345	£ 419,590		8.08%	5.05%	£ 8,455,216	£ 1,212		
National	St Helens	11/2013	74 - 99	6500 - 7000	£ 6,529,066	£ -	£ 859,113	£ -	£ -	£ -	£ 2,247,969	£ 391,863	£ 368,189		4.07%	3.82%	£ 7,982,402	£ 1,155		
Landowner	St Helens	10/2016	74 - 99	7000 - 7500	£ 5,958,298	£ 1,011,448	£ 435,833	£ -	£ 906,074	£ -	£ 516,118	£ 476,664	£ 297,915		5.					

APPENDIX C

GENERIC CONSTRUCTION COSTS

APPENDIX C

GENERIC COST BREAKDOWNS

5 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2
Prelims		£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2
Ext works		£ 234.87/m2	£ 234.87/m2	£ 225.04/m2	£ 225.04/m2	£ 217.39/m2	£ 217.39/m2	£ 234.87/m2	£ 225.04/m2	£ 217.39/m2	£ 234.87/m2	£ 225.04/m2
POS		£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Abnormals		£ 0.00/m2	£ 66.28/m2	£ 0.00/m2	£ 63.87/m2	£ 0.00/m2	£ 62.06/m2	£ 66.28/m2	£ 63.87/m2	£ 62.06/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 82.41/m2	£ 87.38/m2	£ 81.67/m2	£ 86.46/m2	£ 81.10/m2	£ 85.75/m2	£ 87.38/m2	£ 86.46/m2	£ 85.75/m2	£ 82.41/m2	£ 81.67/m2
Conts	5.00%	£ 59.06/m2	£ 62.62/m2	£ 58.53/m2	£ 61.96/m2	£ 58.12/m2	£ 61.45/m2	£ 62.62/m2	£ 61.96/m2	£ 61.45/m2	£ 59.06/m2	£ 58.53/m2
Scale		£ 86.82/m2	£ 92.05/m2	£ 86.04/m2	£ 91.09/m2	£ 85.43/m2	£ 90.34/m2	£ 92.05/m2	£ 91.09/m2	£ 90.34/m2	£ 86.82/m2	£ 86.04/m2
Total/m2		£ 1,327/m2	£ 1,407/m2	£ 1,315/m2	£ 1,392/m2	£ 1,306/m2	£ 1,381/m2	£ 1,407/m2	£ 1,392/m2	£ 1,381/m2	£ 1,327/m2	£ 1,315/m2

10 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 704.52/m2	£ 704.52/m2	£ 704.52/m2	£ 708.42/m2	£ 708.42/m2
Prelims		£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 135.05/m2	£ 135.05/m2	£ 135.05/m2	£ 139.48/m2	£ 139.48/m2
Ext works		£ 255.32/m2	£ 255.32/m2	£ 244.89/m2	£ 244.89/m2	£ 236.76/m2	£ 236.76/m2	£ 253.30/m2	£ 242.37/m2	£ 233.86/m2	£ 259.50/m2	£ 248.23/m2
POS		£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.59/m2	£ 10.59/m2	£ 10.59/m2	£ 10.94/m2	£ 10.94/m2
Abnormals		£ 0.00/m2	£ 67.31/m2	£ 0.00/m2	£ 64.75/m2	£ 0.00/m2	£ 62.83/m2	£ 68.16/m2	£ 65.48/m2	£ 63.47/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 81.68/m2	£ 86.73/m2	£ 80.90/m2	£ 85.76/m2	£ 80.29/m2	£ 85.00/m2	£ 87.87/m2	£ 86.85/m2	£ 86.06/m2	£ 83.88/m2	£ 83.03/m2
Conts	5.00%	£ 58.54/m2	£ 62.16/m2	£ 57.98/m2	£ 61.46/m2	£ 57.54/m2	£ 60.92/m2	£ 62.97/m2	£ 62.24/m2	£ 61.68/m2	£ 60.11/m2	£ 59.50/m2
Scale		£ 61.47/m2	£ 65.27/m2	£ 60.88/m2	£ 64.53/m2	£ 60.42/m2	£ 63.97/m2	£ 66.12/m2	£ 65.36/m2	£ 64.76/m2	£ 63.12/m2	£ 62.48/m2
Total/m2		£ 1,291/m2	£ 1,371/m2	£ 1,278/m2	£ 1,355/m2	£ 1,269/m2	£ 1,343/m2	£ 1,389/m2	£ 1,372/m2	£ 1,360/m2	£ 1,325/m2	£ 1,312/m2

APPENDIX C

GENERIC COST BREAKDOWNS

25 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 702.65/m2	£ 702.65/m2	£ 702.62/m2	£ 702.64/m2	£ 702.65/m2	£ 702.65/m2	£ 701.38/m2	£ 701.38/m2	£ 701.38/m2	£ 703.55/m2	£ 703.55/m2
Prelims		£ 107.07/m2	£ 107.05/m2	£ 107.07/m2	£ 107.22/m2	£ 107.22/m2	£ 107.22/m2	£ 107.92/m2	£ 107.92/m2	£ 107.92/m2	£ 110.95/m2	£ 110.95/m2
Ext works		£ 264.49/m2	£ 264.49/m2	£ 253.45/m2	£ 253.45/m2	£ 244.85/m2	£ 244.85/m2	£ 261.79/m2	£ 250.68/m2	£ 242.03/m2	£ 269.38/m2	£ 257.96/m2
POS		£ 17.78/m2	£ 17.78/m2	£ 16.77/m2	£ 16.77/m2	£ 16.01/m2	£ 16.01/m2	£ 17.89/m2	£ 16.87/m2	£ 16.11/m2	£ 18.40/m2	£ 17.35/m2
Abnormals		£ 0.00/m2	£ 70.52/m2	£ 0.00/m2	£ 67.51/m2	£ 0.00/m2	£ 65.26/m2	£ 70.58/m2	£ 67.55/m2	£ 65.28/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 81.90/m2	£ 87.19/m2	£ 80.99/m2	£ 86.07/m2	£ 80.30/m2	£ 85.20/m2	£ 86.97/m2	£ 85.83/m2	£ 84.95/m2	£ 82.67/m2	£ 81.74/m2
Conts	5.00%	£ 58.69/m2	£ 62.48/m2	£ 58.05/m2	£ 61.68/m2	£ 57.55/m2	£ 61.06/m2	£ 62.33/m2	£ 61.51/m2	£ 60.88/m2	£ 59.25/m2	£ 58.58/m2
Scale		£ 25.88/m2	£ 27.82/m2	£ 25.60/m2	£ 27.20/m2	£ 25.11/m2	£ 26.86/m2	£ 32.72/m2	£ 32.29/m2	£ 31.96/m2	£ 31.10/m2	£ 30.75/m2
Total/m2		£ 1,258/m2	£ 1,340/m2	£ 1,245/m2	£ 1,323/m2	£ 1,234/m2	£ 1,309/m2	£ 1,342/m2	£ 1,324/m2	£ 1,311/m2	£ 1,275/m2	£ 1,261/m2

50 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 699.01/m2	£ 697.78/m2	£ 698.60/m2	£ 697.90/m2	£ 698.69/m2	£ 698.00/m2	£ 704.20/m2	£ 704.16/m2	£ 704.16/m2	£ 705.02/m2	£ 705.02/m2
Prelims		£ 105.30/m2	£ 105.23/m2	£ 105.23/m2	£ 105.23/m2	£ 105.23/m2	£ 104.69/m2	£ 95.26/m2	£ 95.26/m2	£ 95.26/m2	£ 97.16/m2	£ 97.16/m2
Ext works		£ 267.51/m2	£ 267.32/m2	£ 256.16/m2	£ 256.16/m2	£ 247.47/m2	£ 247.47/m2	£ 266.81/m2	£ 255.54/m2	£ 246.77/m2	£ 270.14/m2	£ 258.66/m2
POS		£ 15.33/m2	£ 25.13/m2	£ 23.08/m2	£ 23.08/m2	£ 21.55/m2	£ 21.55/m2	£ 12.68/m2	£ 11.64/m2	£ 10.87/m2	£ 12.93/m2	£ 11.88/m2
Abnormals		£ 0.00/m2	£ 73.40/m2	£ 0.00/m2	£ 70.06/m2	£ 0.00/m2	£ 67.55/m2	£ 70.86/m2	£ 67.79/m2	£ 65.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.00%	£ 76.92/m2	£ 70.87/m2	£ 65.68/m2	£ 69.88/m2	£ 65.06/m2	£ 69.08/m2	£ 68.99/m2	£ 68.06/m2	£ 67.35/m2	£ 65.11/m2	£ 64.36/m2
Conts	5.00%	£ 58.79/m2	£ 62.60/m2	£ 58.01/m2	£ 61.73/m2	£ 57.47/m2	£ 61.02/m2	£ 60.94/m2	£ 60.12/m2	£ 59.50/m2	£ 57.52/m2	£ 56.85/m2
Scale		£ 18.54/m2	£ 19.72/m2	£ 19.80/m2	£ 20.57/m2	£ 20.22/m2	£ 21.79/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Total/m2		£ 1,241/m2	£ 1,322/m2	£ 1,227/m2	£ 1,305/m2	£ 1,216/m2	£ 1,291/m2	£ 1,280/m2	£ 1,263/m2	£ 1,249/m2	£ 1,208/m2	£ 1,194/m2

APPENDIX C

GENERIC COST BREAKDOWNS

75 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 703.06/m2	£ 703.06/m2	£ 703.06/m2	£ 703.92/m2	£ 703.92/m2
Prelims		£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 96.29/m2	£ 96.29/m2	£ 96.29/m2	£ 98.04/m2	£ 98.04/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 265.69/m2	£ 254.44/m2	£ 245.67/m2	£ 269.79/m2	£ 258.37/m2
POS		£ 24.78/m2	£ 24.78/m2	£ 21.74/m2	£ 21.74/m2	£ 8.86/m2	£ 8.86/m2	£ 25.30/m2	£ 22.21/m2	£ 9.05/m2	£ 25.68/m2	£ 22.54/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 65.16/m2	£ 75.15/m2	£ 71.47/m2	£ 65.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	6.00%	£ 65.08/m2	£ 69.56/m2	£ 64.24/m2	£ 68.50/m2	£ 62.95/m2	£ 66.86/m2	£ 69.93/m2	£ 68.85/m2	£ 67.17/m2	£ 65.85/m2	£ 64.97/m2
Conts	5.00%	£ 57.49/m2	£ 61.44/m2	£ 56.74/m2	£ 60.51/m2	£ 55.61/m2	£ 59.06/m2	£ 61.77/m2	£ 60.82/m2	£ 59.34/m2	£ 58.16/m2	£ 57.39/m2
Scale		£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Total/m2		£ 1,207/m2	£ 1,290/m2	£ 1,192/m2	£ 1,271/m2	£ 1,168/m2	£ 1,240/m2	£ 1,297/m2	£ 1,277/m2	£ 1,246/m2	£ 1,221/m2	£ 1,205/m2

100 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 702.26/m2	£ 702.26/m2	£ 702.26/m2	£ 703.71/m2	£ 703.71/m2
Prelims		£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 99.95/m2	£ 99.95/m2	£ 99.95/m2	£ 102.60/m2	£ 102.60/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 264.96/m2	£ 253.83/m2	£ 245.16/m2	£ 269.25/m2	£ 257.83/m2
POS		£ 27.62/m2	£ 27.62/m2	£ 24.59/m2	£ 24.59/m2	£ 22.32/m2	£ 22.32/m2	£ 27.89/m2	£ 24.83/m2	£ 22.53/m2	£ 28.63/m2	£ 25.49/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 68.31/m2	£ 74.85/m2	£ 71.22/m2	£ 68.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	5.00%	£ 54.61/m2	£ 58.34/m2	£ 53.91/m2	£ 57.46/m2	£ 53.37/m2	£ 56.78/m2	£ 58.50/m2	£ 57.60/m2	£ 56.92/m2	£ 55.21/m2	£ 54.48/m2
Conts	5.00%	£ 57.34/m2	£ 61.26/m2	£ 56.60/m2	£ 60.33/m2	£ 56.03/m2	£ 59.62/m2	£ 61.42/m2	£ 60.48/m2	£ 59.77/m2	£ 57.97/m2	£ 57.21/m2
Scale		-£ 18.06/m2	-£ 19.30/m2	-£ 17.83/m2	-£ 19.00/m2	-£ 17.65/m2	-£ 18.78/m2	-£ 19.35/m2	-£ 19.05/m2	-£ 18.83/m2	-£ 18.26/m2	-£ 18.02/m2
Total/m2		£ 1,186/m2	£ 1,267/m2	£ 1,171/m2	£ 1,248/m2	£ 1,159/m2	£ 1,233/m2	£ 1,270/m2	£ 1,251/m2	£ 1,236/m2	£ 1,199/m2	£ 1,183/m2

APPENDIX C

GENERIC COST BREAKDOWNS

200 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 702.26/m2	£ 702.26/m2	£ 702.26/m2	£ 703.66/m2	£ 703.66/m2
Prelims		£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 67.20/m2	£ 67.20/m2	£ 67.20/m2	£ 68.87/m2	£ 68.87/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 265.07/m2	£ 253.95/m2	£ 245.28/m2	£ 269.29/m2	£ 257.89/m2
POS		£ 27.62/m2	£ 27.62/m2	£ 24.59/m2	£ 24.59/m2	£ 22.32/m2	£ 22.32/m2	£ 27.89/m2	£ 24.83/m2	£ 22.53/m2	£ 28.58/m2	£ 25.45/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 68.31/m2	£ 74.85/m2	£ 71.22/m2	£ 68.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	5.00%	£ 52.99/m2	£ 56.72/m2	£ 52.29/m2	£ 55.84/m2	£ 51.74/m2	£ 55.16/m2	£ 56.86/m2	£ 55.97/m2	£ 55.29/m2	£ 53.52/m2	£ 52.79/m2
Conts	5.00%	£ 55.64/m2	£ 59.56/m2	£ 54.90/m2	£ 58.63/m2	£ 54.33/m2	£ 57.92/m2	£ 59.71/m2	£ 58.77/m2	£ 58.05/m2	£ 56.20/m2	£ 55.43/m2
Scale		-£ 17.53/m2	-£ 18.76/m2	-£ 17.29/m2	-£ 18.47/m2	-£ 17.11/m2	-£ 18.24/m2	-£ 18.81/m2	-£ 18.51/m2	-£ 18.29/m2	-£ 17.70/m2	-£ 17.46/m2
Total/m2		£ 1,151/m2	£ 1,232/m2	£ 1,136/m2	£ 1,213/m2	£ 1,124/m2	£ 1,198/m2	£ 1,235/m2	£ 1,216/m2	£ 1,201/m2	£ 1,162/m2	£ 1,147/m2

APPENDIX D

SCALE FACTORS

Tender price studies

Contract sum

➤ Rebased to 4Q 2018 (331; sample 81) and St Helens (98; sample 31)

The series contained on the page are as published on 12-Nov-2018

Background

The Contract Sum study is based on a least squares linear regression with the natural logarithm of the adjusted project index as the dependant variable and the logarithm (base 10) of the contract sum (adjusted to 1985 prices) as the independent variable. The parameters obtained can be transformed into a formula which calculates a factor directly from a contract sum or you can look up a factor using the table below.

A Contract Sum factor can be calculated as follows:

- Calculate Contract Sum at 1985 prices.
- Raise this figure to the power -0.03682.
- Multiply by 1.63331.

Notes:

- Mean contract value = £1,983,000
- The study was based on projects in the range £162,000 to £49,000,000 and is not applicable to smaller or larger projects

Base: Mean contract value = 100

Updated: 09-Nov-2018

Contract value	Index	90% confidence interval	90% prediction interval
£150,000	110	109 - 111	93 - 131
£190,000	109	109 - 109	92 - 129
£250,000	108	108 - 108	91 - 128
£320,000	107	107 - 107	90 - 127
£410,000	106	106 - 106	89 - 126
£530,000	105	105 - 105	88 - 125
£680,000	104	104 - 104	88 - 123
£890,000	103	103 - 103	87 - 122
£1,200,000	102	102 - 102	86 - 121
£1,500,000	101	101 - 101	85 - 120
£2,000,000	100	100 - 100	84 - 119
£2,600,000	99	99 - 99	83 - 117
£3,400,000	98	98 - 98	83 - 116
£4,500,000	97	97 - 97	82 - 115
£6,000,000	96	96 - 96	81 - 114
£8,000,000	95	95 - 95	80 - 113
£11,000,000	94	94 - 94	79 - 112
£14,000,000	93	93 - 93	78 - 110
£19,000,000	92	92 - 92	78 - 109
£26,000,000	91	91 - 91	77 - 108
£35,000,000	90	90 - 90	76 - 107
£47,000,000	89	88 - 90	75 - 106

APPENDIX E

GENERIC CONSTRUCTION COST COMPARISON TO DATABASE

APPENDIX E

GENERIC COST BREAKDOWNS

5 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,327/m2	£ 1,315/m2	£ 1,306/m2	£ 1,327/m2	£ 1,315/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,310/m2	£ 1,309/m2	£ 776/m2	£ 2,089/m2
St Helens Only	£ 1,261/m2	£ 1,240/m2	£ 776/m2	£ 1,814/m2

10 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,291/m2	£ 1,278/m2	£ 1,269/m2	£ 1,325/m2	£ 1,312/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,310/m2	£ 1,309/m2	£ 776/m2	£ 2,089/m2
St Helens Only	£ 1,261/m2	£ 1,240/m2	£ 776/m2	£ 1,814/m2

25 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,258/m2	£ 1,245/m2	£ 1,234/m2	£ 1,275/m2	£ 1,261/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,285/m2	£ 1,240/m2	£ 976/m2	£ 1,723/m2
St Helens Only*	£ 1,516/m2	£ 1,516/m2	£ 1,516/m2	£ 1,516/m2

50 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,241/m2	£ 1,227/m2	£ 1,216/m2	£ 1,208/m2	£ 1,194/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,147/m2	£ 1,121/m2	£ 859/m2	£ 1,436/m2
St Helens Only	£ 1,120/m2	£ 1,113/m2	£ 986/m2	£ 1,217/m2

75 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,207/m2	£ 1,192/m2	£ 1,168/m2	£ 1,221/m2	£ 1,205/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,189/m2	£ 1,212/m2	£ 846/m2	£ 1,408/m2
St Helens Only	£ 1,070/m2	£ 1,104/m2	£ 846/m2	£ 1,240/m2

100 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,186/m2	£ 1,171/m2	£ 1,159/m2	£ 1,199/m2	£ 1,183/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,162/m2	£ 1,186/m2	£ 713/m2	£ 1,457/m2
St Helens Only	£ 1,228/m2	£ 1,215/m2	£ 1,136/m2	£ 1,439/m2

200 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,151/m2	£ 1,136/m2	£ 1,124/m2	£ 1,162/m2	£ 1,147/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,199/m2	£ 1,211/m2	£ 1,014/m2	£ 1,363/m2
St Helens Only	£ 1,193/m2	£ 1,235/m2	£ 1,014/m2	£ 1,333/m2

* Only one scheme in this category in St Helens

APPENDIX F

ALLOCATIONS CONSTRUCTION COST COMPARISON TO DATABASE

APPENDIX F

Allocations Analysis

Allocation	7HA	1HA
No Dwellings	181	216
Floor Area (sq.m)	15106	18046
Base, ext works, prelims	£16,817,366	£20,044,600
Abnormals	£400,600	£80,000
Fees	£1,291,347	£1,509,345
Contingency	£925,466	£1,081,697
Fee % Total base +abnormals	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%
Base, ext, prelims	£16,817,366	£20,044,600
Fees	£1,261,302	£1,503,345
Contingency	£903,934	£1,077,397
Total ex abnormals	£18,982,602	£22,625,342
Rate (per sq.m) ex abnormals	£1,257	£1,254

Allocation	8HA	9HA
No Dwellings	259	350
Floor Area (sq.m)	21614	30518
Base, ext works, prelims	£24,395,314	£32,663,601
Abnormals	£735,600	£3,173,000
Fees	£1,884,819	£2,687,723
Contingency	£1,350,787	£1,926,201
Fee % Total base +abnormals	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%
Base, ext, prelims	£24,395,314	£32,663,601
Fees	£1,829,649	£2,449,750
Contingency	£1,311,248	£1,755,654
Total ex abnormals	£27,536,211	£36,869,005
Rate (per sq.m) ex abnormals	£1,274	£1,208

Allocation	2HA	5HA	10HA	6HA	4HA
No Dwellings	522	569	802	816	2988
Floor Area (sq.m)	43548	47478	69844	71070	249401
Base, ext works, prelims	£47,591,164	£51,185,797	£75,772,603	£78,025,571	£264,961,986
Abnormals	£815,300	£1,899,000	£6,057,000	£5,617,000	£2,560,000
Fees	£3,630,485	£3,981,360	£6,137,220	£6,273,193	£20,064,149
Contingency	£2,601,847	£2,853,308	£4,398,341	£4,495,788	£14,379,307
Fee % Total base +abnormals	7.50%	7.50%	7.50%	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%	5.00%	5.00%	5.00%
Base, ext, prelims	£47,591,164	£51,185,797	£75,772,603	£78,025,571	£264,961,986
Fees	£3,569,337	£3,838,935	£5,682,945	£5,851,918	£19,872,149
Contingency	£2,558,025	£2,751,237	£4,072,777	£4,193,874	£14,241,707
Total ex abnormals	£53,718,526	£57,775,969	£85,528,325	£88,071,363	£299,075,842
Rate (per sq.m) ex abnormals	£1,234	£1,217	£1,225	£1,239	£1,199

150-225 dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,199/m2	£ 1,211/m2	£ 1,014/m2	£ 1,363/m2
St Helens Only	£ 1,193/m2	£ 1,235/m2	£ 1,014/m2	£ 1,333/m2

226-500 Dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,171/m2	£ 1,148/m2	£ 952/m2	£ 1,341/m2
St Helens Only*	£ 952/m2	£ 952/m2	£ 952/m2	£ 952/m2

Over 500 dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,200/m2	£ 1,157/m2	£ 1,015/m2	£ 1,359/m2
St Helens Only*	£ 1,359/m2	£ 1,359/m2	£ 1,359/m2	£ 1,359/m2

* Only one scheme in this category in St Helens

**APPENDIX 22: KEPPIE MASSIE'S RESPONSE TO
COMMENTS SUBMITTED BY TURLEY (REF: RO1959)**

RESPONSE NOTE

TURLEY

ST HELENS LOCAL PLAN

ECONOMIC VIABILITY ASSESSMENT

JUNE | 2020

1.0 INTRODUCTION

1.1 We have prepared this structured response note with reference to the comments made by Turley at Section 11 (Viability Assessment) of their overall response in relation to the Local Plan consultation. We understand that these comments have been submitted by Turley on behalf of their client Peel. At the outset we would wish to clarify whether the comments made in Turley's response are their own objective opinions or those of their client Peel, as throughout the document reference is made to "it is Peel's view" or "Peel regards" or "it is Peels opinion".

1.2 This response note is structured to reflect the main themes raised by Turley/Peel and as appropriate addresses the following aspects:

Section 2 – Methodology

Section 3 – Overview of St Helens

Section 4 – Financial Appraisal Assumptions

Section 5 – Residential Appraisal Assumptions

Section 6 – Construction Costs

Section 7 – Developers Profit and Overhead

Section 8 – Viability Testing Results

Section 9 - Conclusions

1.3 In support of our comments we have also attached the following appendices:

Appendix 1 – Briefing Note Database and Construction Cost Assessment

1.4 For ease of reference we have abbreviated the following:

Turley response - "TR"

The Local Plan Economic Viability Assessment – "EVA"

Report of Construction Costs – "RCC"

2.0 METHODOLOGY

Apartment Testing

- 2.1 Paras 11.10 -11.11 of the TR relate to the apartment typologies at table 3.5 of the EVA and the mix of 1 and 2 bed apartments tested at table 3.9 of the EVA.
- 2.2 The dwelling numbers and mix for schemes 8 and 9 are in line with that contained in the QS report at Appendix 5 of the EVA. Table 3.5 therefore needs to be amended to show that scheme 8 is for 15 dwellings rather than 10. The apartment mix also varies slightly from that contained in table 3.9 with the mix being closer to one third 1 bed and two thirds 2 bed. For the avoidance of doubt the amended tables are below. The amendment is not considered material and does alter the testing results nor the outcome of the EVA or the ability of the reader to review the testing and form conclusions regarding the outcome.

Scheme	No Dwellings	Comments
8	15	Standard scheme 2 floors and no lift
9	50	Standard Scheme 3 floors and lift

Table 3.5: Apartment Testing Typologies (Corrected)

Scheme	1 bed	2 bed
8	33%	67%
9	30%	70%

Table 3.9: Apartment Mix for Viability Assessment (Corrected)

Gross to Net Site Area

- 2.3 Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. Specific reference is made to the sites above 20ha for which Turley conclude that a net developable area equating to 60% of the gross site area is more appropriate for these sites. (para 11.13). No evidence is provided by Turley or their client Peel to support this assertion.

- 2.4 The viability testing reflects the gross to net site area methodology taken from the SHLAA and the site area, capacities and densities of the proposed Local Plan allocations. Therefore this is considered to be a robust basis for the viability testing.

S106 Contribution

- 2.5 Turley seek evidence to support the residual S106 contribution used in the testing at £1,000 per dwelling. The S106 contribution is based on residual requirement for S106 contributions excluding requirements for affordable housing, open space and education. Table 2.1 contains a summary of the S106 contributions secured by the Council from applications providing a total of 3,545 dwellings. The table includes details of the total sum together with the number of dwellings that have contributed to that total and finally the overall amount per dwelling based on the number of dwellings.

	POS	Highways	Affordable	Health	Education
Total Amount	£854,294	£294,493	£3,206,065	£150,000	£72,358
Total Dwellings	1,269	1,989	1,269	630	358
Amount per dwelling	£673	£148	£2,526	£238	£202

Table 2.1: Summary of S106 Contributions Secured

- 2.6 Requirements for POS, Affordable Housing and Education are dealt with elsewhere in the testing, therefore in terms of the data in table 2.1, it is only requirements for highways and health contributions that would need to be covered by the residual sum of £1,000 per dwelling. The data from table 2.1 shows that a total amount of £386 per dwelling has on average been paid for these items although not all developments have needed to make contributions under these headings. Based on the total number of dwellings included in the applications at 3,545 only 56% of the consented dwellings have been required to provide a highways contribution and only 18% have contributed towards health provision.
- 2.7 Based on the analysis of S106 contributions then the residual sum assumed at £1,000 per dwelling, is well in excess of the average total residual amount of £386 per dwelling. Indeed based on the evidence of S106 contributions, a number of future developments may not in fact be subject to a residual S106 contribution for matters such as highways or health.

3.0 OVERVIEW OF ST HELENS

- 3.1 At para 11.15 Turley request that for table 4.6 of the EVA, data in relation to the number of sales per month should be provided to provide context and ensure that it is based on an appropriate evidence base.
- 3.2 As noted in para 4.30 of the EVA the information is provided by Land Registry and therefore is appropriate evidence. To address the requirement from Turley we have expanded table 4.6 of the EVA to include the information provided by Land Registry relating to the number of sales per month. This expanded table is provided below.

Date	New Build	New Build No Sales	Second Hand	Second Hand No Sales	Percentage difference
May 2017	£182,814	34	£118,326	211	54.50%
Jun 2017	£183,430	40	£119,835	202	53.07%
Jul 2017	£182,872	18	£120,034	206	52.35%
Aug 2017	£184,110	19	£121,672	218	51.32%
Sept 2017	£183,147	31	£120,711	203	51.72%
Oct 2017	£182,459	32	£119,921	213	52.15%
Nov 2017	£181,055	21	£118,930	212	52.24%
Dec 2017	£181,890	45	£119,493	217	52.22%
Jan 2018	£184,999	7	£120,658	161	53.33%
Feb 2018	£190,736	17	£121,830	179	56.56%
Mar 2018	£191,513	26	£121,608	183	57.48%
Apr 2018	£190,452	19	£120,944	171	57.47%
Increase	4.18%	309	2.21%	2,376	

Table 4.6: Comparison of New Build and Second Hand Sales Prices (including no of sales)

4.0 FINANCIAL APPRAISAL ASSUMPTIONS

Benchmark Land Values

- 4.1 Para 11.17 of the TR questions the source of data for the net developable area of the sites contained in the land sales information provided at Appendix 4 of the EVA. For the avoidance of doubt details of about the sale prices for commercial sites have generally been obtained from Co-star or Land Registry, whilst for residential sites the sales prices have been obtained from Land Registry.
- 4.2 In terms of the site area information then for commercial transactions this will normally be obtained either from the Co-star entry or the documents uploaded with the planning application. Similarly for the residential land sales the site area information has been obtained from the planning application documents. We have data in relation to many of the residential sites listed having previously dealt with the site specific viability assessments. Whilst in terms of the commercial sites our Agency and Valuation Departments also hold information in relation to a number of the sales.
- 4.3 Para 11.20 of the TR notes that the land sales data provided at Appendix 4 are heavily weighted towards brownfield sites, with only on pure greenfield entry. As noted in para 5.12 of the EVA, development in St Helens over the last few years has predominantly been on previously developed brownfield sites, with very limited greenfield development. The green belt review that has been undertaken to inform the emerging Local Plan has however resulted in a number of greenfield sites on the edge of settlement boundaries being identified as proposed allocations. The limited number of greenfield land sales therefore reflects the circumstances in St Helens rather than any deficiencies that Turley perceive in the evidence base.
- 4.4 The comments contained in the TR appear to relate to the proposition that the greenfield benchmark land values should be increased so that they are on parity with the levels for previously developed sites. No evidence is provided by Turley relating to greenfield benchmark land values in St Helens or elsewhere for that matter, nor do they provide any calculation to support their statement regarding greenfield land values. It is therefore not possible for us to derive any useful information or evidence from their statement that may lead to an adjustment in our approach to greenfield benchmark land values.

- 4.5 We have dealt with very many Local Plan and CIL Viability Assessments that have been found sound as outlined in para 1.14 of the EVA. It is our experience and reflecting the relevant guidance, there is always a differentiation between greenfield and brownfield benchmark land values reflecting the fact that greenfield sites have significantly lower existing use values than previously developed sites. There may be certain instances in low value areas such as for Zone 1 here, where that impact of the land owner premium results in similar benchmark land value for the two types of site.
- 4.6 The most up to date CIL guidance acknowledges the differentiation between the benchmark land values for greenfield and brownfield sites by allowing LPAs to set differential rates reflecting the differences in land value uplift created by development. In doing so this allows LPAs to optimise the funding received through the levy.
- 4.7 This differential approach is considered to be wholly appropriate in assessing benchmark land values as it reflects good practice guidance and, in this context, the respective differences in existing use value between what is generally agricultural land with a low existing use value and brownfield land which typically is in some form of commercial use with a much higher value.
- 4.8 In terms of greenfield land the most recent RICS Rural Market Survey for the North West (H1 2018) reported arable land values at £9,375 per acre and pastoral land values at £6,375 per acre. This compares with existing use values for commercial development land in the region of £100,000 per acre to £200,000 per acre and for the more tertiary sites sometimes even less. Clearly from the starting point of existing use value there is a significant difference between greenfield and brownfield land values.
- 4.9 In terms of land owner premium for greenfield sites in zones 1 and 2 we have assumed an uplift of 14 times existing use value as being sufficient to incentivise a landowner to sell. This uplift applied to an existing use value of £10,000 per acre resulted in a total benchmark land value of £150,000 per acre. For the greenfield sites in the higher value zone we assumed a landowner premium of 24 times existing use value giving an overall benchmark land value of £250,000 per acre.
- 4.10 With reference to para 11.27 of the TR it is confirmed that the benchmark land value, as is normally the case, has been applied to the net developable site area. It is considered that balanced against an existing use value of £10,000 per acre, then a benchmark land value of £150,000 per acre equivalent to 15 times existing use value, would be more than sufficient to incentivise a landowner to sell a greenfield site in Zones 1 and 2.

- 4.11 With reference to the TR it is assumed that in the absence of comments to the contrary Turley and their client Peel are in agreement with the brownfield benchmark land values adopted. They do not however confirm their opinion of the greenfield benchmark land value, nor do they provide any evidence to support their assertions.

Commercial Land Values

- 4.12 With reference to para 11.30 of the TR we can confirm that no price paid data is provided in relation to the Stopgate Lane site in the table of commercial land sales at Appendix 4 of the EVA because as noted in the table the site had not sold so was available at the time that the information was compiled. Hence until a sale was agreed and completed the final purchase price was not known.
- 4.13 The price paid for the Canada Dock site on Derby Road in Liverpool is understood to be £640,000. Having reconfirmed the details with our Agency Department we understand that in fact the site area was slightly larger at around 4.15 acres rather than the 4 acres quoted in the EVA, and that the price paid therefore equates to approximately £154,000 per acre. This change is not material.
- 4.14 With reference to 11.31 of the TR, the price paid per ha for the Beacon 62 site has been correctly calculated. The suggested anomaly in the Turley response arises due to rounding of the site area. The site area in hectares is just over 4.656 which in the table has been rounded to 4.7 ha. The price per hectare in the table at Appendix 4 is therefore correct and the information contained in the table is more than sufficient to enable stakeholder review.

5.0 RESIDENTIAL APPRAISAL ASSUMPTIONS

Development Programme

- 5.1 At para 11.32 of the TR reference is made to further clarification of the exact sales rate adopted for each scheme. The QS cost report at Appendix 5 of the EVA contains specific detail of the sales rate and construction period adopted for each scheme. This does not vary with Zone nor with reference to the extent of affordable provision which in our experience would serve to increase the sales rate. Affordable housing is effectively pre-sold to an RP and sales take place on construction completion at various points during the development programme. Hence the inclusion of affordable housing in a development will result in a faster sales rate, than for an equivalent 100% market housing scheme.
- 5.2 Information in relation to sales rates achieved in St Helens is provided in the sales information contained in Appendix 2 of the EVA. However for ease of reference we have summarised the sales rates (for market housing only ie. excluding affordable units) that may be derived from this sales evidence in Appendix 2. This sales rate analysis is contained in table 5.1.

Affordable Housing Zone	Development	Area	No Sales	Average Sales per month
1	Hamelin Park	Parr	30	2.1
2	The Willows	Earlestown	77	4.5
	Brookfields	Earlestown	22	2.5
	Radley Park	Thatto Heath	37	1.5
	Waterside Village	Thatto Heath	33	1.8
	Vulcan Park (Vulcan)	Western Newton le Willows	83	3.5
	Newlands Grange (Vulcan)	Western Newton le Willows	41	2.6
	Beech Gardens	Windlehurst	82	3.7
	Victoria Gardens	Windlehurst	40	3.1
	Eccleston Grange	Eccleston	112	4.3
3	Linearbank Grange	Rainford	9	2.2
	Stephenson Grove	Rainhill	42	4.6

Table 5.1: Sales Rates from Data at EVA Appendix 2

- 5.3 For standalone schemes where there is substantive sales information (excluding affordable housing) the sales rate varies between 2.1 sales per month for the Hamelin Park development in Parr up to 4.6 sales per month for the Stephenson Grove development in Rainhill. The assumption in the EVA of 3 sales per month for the majority of schemes that have been tested is therefore a reasonable average for a high level assessment.
- 5.4 With reference to the information contained in Appendix 2 of the EVA and table 4.1 above. There is data relating to 3 relatively large developments where there is more than one developer on the site. These respective schemes are highlighted green, blue and pink in table 4.1. The combined sales rates for these schemes (excluding affordable housing) are:
- The Willows/Brookfields – 7 sales per month;
Radley Park/Waterside Village – 3.37 sales per month;
Vulcan Park/Newlands Grange – 6.01 per month.
- 5.5 Each of these developments is situated in Zone 2. This evidence as to sales rates supports the average rates that have been adopted in the EVA and in fact generally suggests that the assumptions that have been made are conservative with sales of market housing alone taking place at a faster rate than has been assumed.
- 5.6 For the largest site of nearly 3,000 units it would not be unreasonable in our experience to assume as a minimum 5 sales outlets with a sales rate of 2-2.5 per month. This gives 10 sales as a minimum per month. This approach to sales rates is that has been proposed by a developer consortium in respect of a site in a neighbouring authority with similar market conditions. The particular site is less than half the size of the largest allocation here. The sales rate assumption that we have made in relation to the large allocation at 10 dwellings per month is in the circumstances robustly conservative.
- 5.7 At para 11.34 Turley request provision of appraisals and supporting cashflows. For a Local Plan Viability Assessment such as this we normally prepare many hundreds of financial appraisals all with supporting cashflows. Given the sheer volume of this information we do not normally provide this as an appendix to the report as this would run to many 1,000s of pages. Many of the cashflows themselves will be multiple pages. A selection of the appraisals and cashflows can be provided to assist and elsewhere we have provided summaries of a sample of base appraisals for review.

Sales Values

- 5.8 At para 11.35 the TR states that the source of sales data and floor areas in Appendix 2 of the EVA must be provided. As is normal practice the sales data has been sourced from Land Registry and the dwelling sizes taken from the documents uploaded with the respective planning application for the development. In a small number of cases the dwelling size information wasn't available with the application documents, and as stated in Appendix 2 where this was the case the relevant information was sourced from the energy performance certificate (EPC) for the respective dwelling.

Bungalow Sales Prices 10% Uplift

- 5.9 At para 11.35 the TR questions the addition of a 10% uplift to the value of new bungalows over the prices adopted for houses generally in the EVA. Further information is requested by them to support the reasoning as they consider that the assumption of a 10% uplift to the value of bungalows runs the risk of overstating the viability of larger sites.
- 5.10 In the absence of new bungalow developments in St Helens we have sales data and analysis relating to second hand bungalow sales taken from Land Registry. This data can be made available as required. Over the period that the sales evidence was gathered in 2017/18, the data shows there were no bungalow sales in Zone 1 although this reflects the character of housing stock in this area which is typically older Victorian terraced houses or Post War Local Authority Housing.
- 5.11 In Zone 2 there were 27 sales of bungalows and in Zone 3 there were 16 sales. The data for Zone 2 included a small number of outliers with prices per sq.ft and sq.m that were either very high or significantly lower than the prevailing data.
- 5.12 Table 5.2 contains details of the average sales prices in Zones 2 and 3 taken from this sales data, compared to the price assumptions made in the EVA.

	Second Hand Sales		EVA Assumptions	
	per sq.m	per sq.ft	per sq.m	per sq.ft
Zone 2	£2,326	£216	£2,309	£215
Zone 3	£2,803	£260	£2,664	£247

Table 5.2: Second Hand Bungalow Sales

- 5.13 The data relating to second hand sales demonstrates average sales prices at the same level as those adopted for new build sales in our testing in zone 2. In zone 3 the evidence from second hand sales was above that adopted for our testing in zone 3. It should be stressed that this data relates to second hand sales and hence reflects the condition and age of the properties. As demonstrated by table 4.6 of the EVA we would expect a premium to be paid for the new build properties being tested in the EVA in comparison with re-sale properties. As a result we consider that the price assumptions contained in the EVA relating to bungalows are fully supported and in fact higher prices could be justified. The evidence indicates that assumptions contained in the EVA as to the price of bungalows run the risk over understating financial viability, rather than overstating it as contended by Turley.

Affordable Units

- 5.14 At para 11.37 Turley state that their opinion together with that of Peel is that offers for Affordable Home Ownership schemes would equate to 65% of market value, however no evidence whatsoever is provided by them to support this opinion and assist our considerations. The definition of Affordable Home ownership includes a number of forms of affordable housing the most common being shared ownership. With reference to Appendix 2 of the EVA we have provided details of recent S106 sales of shared ownership units. The data in relation to the Willows shows shared ownership sales at 65-66% of the value of the equivalent market unit, whilst the data for Vulcan Park shows the sale prices for the shared ownership units at between 77% - 81% of the value of the equivalent market unit. The average of the respective selling prices is 70% of market value and this is the figure that we have adopted in the EVA.

6.0 CONSTRUCTION COSTS

- 6.1 The TR at paras 11.40 to 11.51 contain comments about the evidence from the construction cost database, the need for a breakdown of the generic construction costs and a lack of evidence for scale reductions for larger schemes. These matters are addressed in the Briefing Note that has been provided in relation to the Database and Construction Costs Assessments provided as **Appendix 1** to this response. The construction costs that have been adopted for the purpose of the EVA are consistent with the local evidence of construction costs contained in the database. Turley state that their client Peel regard the absolute minimum base construction cost plus preliminaries to be £90 per sq.ft (£969 per sq.m) however no further explanation of the context of this figure nor the evidence to support it is provided. We are not aware of what specification is being costed at £90 per sq.ft nor whether for example plot costs for paving, gardens etc are included. We remain of the view that the construction costs contained in the EVA are supported by our data and that to cherry pick an unevidenced, individual cost and consider that in isolation as Turley/Peel have done is not useful.
- 6.2 No compelling evidence has been provided by Turley or their client to support why BCIS is a better, more appropriate data source save for their reference to the PPG. We have noted however that in the PPG, BCIS is only given as one example of an appropriate data source. Indeed the PPG states that assessment of costs should be based on evidence which is reflective of local market conditions.
- 6.3 We have noted at paragraphs 2.2 to 2.9 of the Report on Construction Costs (RCC), the limitations of BCIS. In particular the source of data, predominantly from registered providers and for small schemes with an average size of less than 18 makes it of limited relevance to the assessment of cost for large open market developments. Most Registered providers undertake bespoke developments that use bespoke house types designed for that development. While these are, generally, not complex or unusually costly designs, they differ from scheme to scheme, increasing design costs and not realising the economic benefits of standardisation that developers, particularly the larger ones, gain from using a suite of predesigned standard house types.

- 6.4 We are not persuaded that there is a better source of data than our own database in preparing assessments of cost of open market schemes in St Helens once RP developments and outliers are removed. On this basis the dataset for the RCC includes 171 developments with schemes ranging in size from 4 dwellings to 1,322 dwellings. We have been able to interrogate this information with reference to actual schemes so are assured as to the applicability of this data to St Helens in respect of the type, nature of developer, style and size of housing development. With reference to BCIS the data is not sufficiently transparent even with the analysis provided to ensure applicability to the form of development to be provided here. On the balance of evidence our evidence as to construction costs is to be preferred as it is more representative of the locality, nature, form, scale and delivery of development likely to come forward as part of the plan process.
- 6.5 The PPG states that assessment of costs should be based on evidence which is reflective of local market conditions and our database fully accords with this requirement. In the absence of such local evidence of costs, then an alternative may be to use BCIS (with suitable adjustments) but this is in the event that such local evidence does not exist, this clearly isn't the case here.
- 6.6 Turley have also stated that the reduction in costs for larger schemes is not evidenced. This is also dealt with the Briefing Note at **Appendix 1** and in particular we have provided details of the scale published by BCIS. This shows the range of index change with contract size and is readily available from the BCIS website. With reference to this data the reduction shown for a contract of £47m (approx 450 dwellings) is 11%. Overall the development construction costs used in the EVA range from about £650,000 for 5 dwellings to £300,000,000 for the largest allocation at Bold Forest. This range exceeds the range considered by BCIS and that remains the case even if the largest developments are split between developers, as suggested by Turley.
- 6.7 Because larger schemes can (as noted by Turley) be split into several smaller development parcels the scale factors noted by BCIS are not always entirely consistent with market developments. As a result we have taken a more cautious approach and the scale factors that we have used are lower than those identified by BCIS.

- 6.8 At para 11.52 of the TR reference is made to the site opening up costs that we have adopted. These opening up costs, have been included in addition to the construction costs at Appendix B of the RCC for greenfield generic sites. Site opening up costs have been used by us at these levels in very many local plan and CIL EVAs that have been found sound. The present costs are those used for the Cheshire East CIL EVA which have been increased by about 10% due to timing and our judgement of applicability to St Helens. These costs were accepted at the examination for Cheshire East CIL.
- 6.9 We have provided from the evidence submitted to the Cheshire East CIL Examination a breakdown of the opening up costs, based on the largest scheme tested at 1,000 dwellings. The cost was £11,000 per dwelling and updated for time the equivalent cost for St Helens would be about £12,100 per dwelling.

Item	Cost Per Dwelling
Section 278 works; improvements to local road networks	£2,750
Extended service supplies	£3,250
Increased foul drainage capacity	£1,500
Provision of substations	£1,000
Provision of off-site open space	£1,000
TOTAL COSTS	£9,500
Add: Fees and contingencies; 12.5%	£1,187
OVERALL TOTAL	£10,687
SAY	£11,000

Table 6.1: Site Opening Up Costs

- 6.10 As larger sites will place heavier demands on local off-site infrastructure, we have reduced these costs for the smaller sites. It should be noted that these are costs that will vary significantly between otherwise similar developments, depending on the site, its location and the nature of the infrastructure in the area. Some developments may exceed the total while others may incur very little.
- 6.11 The costs incurred in opening up the site will be principally be off-site and could include the cost of any infrastructure reinforcement costs, Section 278 works to highways and possibly off-site open space. On site aspects of infrastructure are already included within the generic construction cost rates and are separate from the costs noted in table 6.1

- 6.12 The TR requests more detail of the abnormal costs used for the brownfield generic sites. The generic sites are notional, and hence there can be no knowledge of what abnormal costs might apply to any particular site. As noted at paragraph 2.33 in the (RCC) we have made realistic allowances for additional site clearance costs and some degree of abnormal foundations. These costs are as follows:

Additional site clearance costs	£5.38/m2 of site area
Additional costs for abnormal foundations	£53.83/m2 of the dwelling GFA

- 6.13 These base rates are subject to adjustment for scale, profit, fees and contingencies.
- 6.14 In addition to these costs a further cost allowance based on 5% of total construction costs has been separately added in the financial appraisals in recognition of the nature of St Helens industrial history and the likelihood that a site may need remediation.

S106 Contributions

- 6.15 This matter is dealt with earlier at para 2.5 – 2.7.

7.0 DEVELOPER'S PROFIT AND OVERHEAD

- 7.1 The TR at para 11.56 refers to the fact that a profit at 17.5% is adopted for the small schemes of 10 dwellings or less. This is considered this to be low although no evidence is provided to support this assertion. As noted at para 5.59 of the EVA the PPG suggests that a profit return of 15-20% of GDV may be considered suitable to establish the viability of plan policies. The profit of 17.5% is well within the range advocated in the PPG and given the more limited risk associated with a development of this size together with the nature of the developer likely to undertake this form of development is considered robust for undertaking an assessment of viability for these smaller schemes.
- 7.2 We have provided table 7.1 which includes details of the profit assumptions contained in the FVAs that have been submitted to us for review for schemes of 10 houses or less. In total there are 19 schemes.

Settlement	No Units	Profit (% GDV)	Comments
St Helens	6	11.98%	
Newton le Willows	5	15.00%	
St Helens	10	15.00%	
Leyland	9	15-20%	
Sandbach	10	18.00%	
Newton le Willows	10	18.00%	Willing to accept 8.6% to complete the scheme
St Helens	10	19.00%	No agreement on profit
Weston	4	20.00%	Ultimate profit in applicants appraisal with no obligations 14.9% of GDV
Acton	7	20.00%	Final agreement based on 18% GDV
Hadfield	9	20.00%	Final agreement based on 18% GDV
Congleton	10	20.00%	No agreement on profit
Rainhill	10	20.00%	No agreement on profit
Forton	10	20.00%	Developer willing to proceed on basis of 14.24% GDV
St Helens	5	21.00%	Profit inclusive of sales, marketing and finance costs
St Helens	6	22.00%	Profit inclusive of sales, marketing and finance costs
Brereton	8	19.3% Cost	Profit equates to 16.23% GDV
St Helens	6	Not Stated	
St Helens	7	Not Stated	Developer actually working off 15.5% GDV
Maryport	10	Not stated	Applicant appraisal no planning contributions 8.5% GDV

Table 7.1: FVA Profit Assumptions 10 houses or less

- 7.3 With reference to the information provided at the outset of the respective assessment and as summarised in table 7.1, four of the FVAs submitted appeared to be based on a minimum profit requirement that was less than 17.5% of GDV. In some cases higher figures were stated, or the applicant in the information provided did not state or provide clear information about their profit requirement. The comments table includes further information about the profit position that was established following further discussions and clarification with applicant. This shows that the profit requirements for a further 6 schemes were less than 17.5% of GDV. In two cases the stated profit requirements of 21% and 22% of GDV were actually inclusive of all marketing, sales and finance costs. The EVA adopts 3.5% for sales and marketing costs irrespective of scheme size. If the respective profits in these two cases at 21% and 22% of GDV are reduced by 3.5%, this gives 17.5% and 18.5% respectively before any deduction is made for finance costs.
- 7.4 Overall therefore from the schemes listed in table 7.1, we established that in fact 12 schemes were based on developer's profits at 17.5% or less. Of the remaining 7 schemes, one had a profit requirement of 18% of GDV and a further 2 were agreed at a profit of 18% of GDV. There was no agreement reached on 3 schemes with profit requirements of 19% and 20%. For the final scheme where the profit requirement was not stated, the information provided by the applicant was not sufficiently clear to establish their profit requirement, however the information provided demonstrated a profit position that was less than 17.5% of GDV.
- 7.5 The evidence demonstrates that in the majority of cases, the type of small, local developers undertaking schemes of 10 dwellings or less, are able to deliver new housing development at profit significantly less than the 20% figure that is being recommended by Turley. Ultimately of the 19 small schemes we have reviewed, only 2 have contained a profit at this level.
- 7.6 It should also be borne in mind that the sales and marketing costs associated with a smaller scheme will be significantly less than those for a larger development as there is not the same requirements for onsite sales staff, show homes etc. The units are often simply marketed by a local estate agent. In 2018 Which reported average estate agents fees of 1.42% inclusive of VAT. In the EVA a total allowance of 3.5% of GDV has been adopted both for the smaller and larger schemes of which around 3% is effectively sales and marketing costs. Clearly in testing the smaller developments sales and marketing costs are unlikely to be at 3% and hence with reference to the Which report there is an additional buffer of around 1.5-1.75% of GDV inherently built into the appraisals, and this is effectively additional developer's profit.

- 7.7 Turley also refer to a widely accepted minimum industry profit level of 20% of GDV. This is not something that we recognise as being a minimum industry accepted level. We have undertaken reviews of viability assessments submitted by many national housebuilders which include profit returns below this level for the market housing with the profit on affordable dwellings included at 6-8% of GDV. The assumption that we have made at 20% of GDV for both market and affordable housing is the maximum figure within the PPG range and is an extremely robust position for a high level viability test. Based on best practice guidance and market circumstances a profit return lower than 20% can be fully supported.
- 7.8 For completeness we have provided at table 7.2 a summary of the developers profit assumptions made in FVAs that have been submitted to us for review. These are the initial profit requirements that have been suggested by the developers in their submissions rather than the lower profit requirements that may have eventually be agreed or adopted following review. The summary data has been presented to show the particular profit range, number of FVAs submitted based on that range, overall percentage of the total number and finally the number of appraisals that then included a stated lower profit for the affordable units. In some cases the profit requirement stated is slightly lower as it represents a blended figure across the market and affordable units, whilst in others the profit requirement is stated separately for the market and affordable houses resulting in a higher figure for the market units.

Profit	No	Percentage	No with Reduced AH profit
Less than 10%	3	1.49%	
10%-14.99%	8	3.96%	1
15%-17.49%	20	9.90%	1
17.5%-19.99%	44	21.78%	4
20% inc finance	2	0.99%	
20%	94	46.53%	20
Over 20%	9	4.46%	1
Less than 15% cost	3	1.49%	
15%-20% cost	18	8.91%	
Over 20% cost	1	0.50%	
	202		27

Table 7.2: Summary of Profit Requirements

- 7.9 The data shows that housebuilders often have different approaches to the assessment of profit. In the majority of cases profit assumptions are based on a percentage of GDV, and sometimes this is a gross figure inclusive of finance. In other cases however the profit calculation is based on a percentage of cost. Generally in those cases where profit is based on cost then the equivalent percentage of GDV will be much lower, often by up to 5%. Overwhelmingly developers assume a profit of 20% or less based on GDV or cost. In only 9 instances (less than 5%) have developers adopted a profit of more than 20% of GDV. Clearly if Turley are correct and many developers do require profits of more than 20% of GDV, then this is not supported by the evidence of FVAs submitted to us by housebuilders and their agents.
- 7.10 In terms of commercial profit Turley reference a profit of 20% on cost as being widely accepted. Again this is not our experience locally in Merseyside and the wider northwest region where a profit on cost of 15% is typically adopted for speculative development and significantly less on pre-lets and pre-sales.

8.0 VIABILITY TESTING RESULTS

- 8.1 The TR notes that brownfield development in Zone 1 is unviable, and for greenfield sites development is only viable at higher densities of 35 dph and above. It is noted that a significant volume of the identified land supply is proposed to be delivered in Zone 1 and suggested that such delivery must be regarded as unviable on the basis of the EVA evidence.
- 8.2 The results of the EVA indicate that market housing development in the lowest value (Zone 1) area is generally not viable based on the assumptions made in the EVA for brownfield sites and some greenfield typologies. As a result the prospects for new housing development are finely balanced in these locations. For development to come forward in these locations either the land owner or developer or both will need to accept a reduction in the level of return that they may be seeking. For development at 35 and 40 dwellings per hectare, on brownfield sites in these locations the greatest deficit is around 9% of GDV and in many cases is significantly less. This suggests that many of the typologies tested are only marginally unviable. A relatively small adjustment to the level of developer's profit or land price or both would enable this form of development to be taken forward in these low value areas.
- 8.3 Table 8.1 contains details of the Council's housing completions data relating to Zone 1 locations.

Year	No Sites	No Completions
2015/16	4	46
2016/17	13	50
2017/18	8	77
2018/19	18	243
2019/20	13	169
Total		585

Table 8.1: St Helens Housing Completions Zone 1

- 8.4 Table 8.1 **shows that there have been 585 completions in Zone 1 locations over the last 5 years.** The completions have taken place across 48 different developments ranging in size from 1 dwelling to 66 dwellings. This data shows that notwithstanding the marginal viability in these locations significant new housing development has taken place over the period since 2015. This indicates that although viability is an issue in Zone 1 landowners and developers appear to be able to achieve a level of return that has not prevented development being delivered. This evidence of actual delivery illustrates that a cautiously robust approach has been adopted by us in our methodology and assumptions. In reality the evidence of delivery suggests that landowners and developers are finding ways of 'improving' on our appraisal assumptions to secure delivery in Zone 1.
- 8.5 At paras 11.64 and 11.65 the TR states that with "appropriate revisions" to greenfield land values and changes to costs, the results within the EVA will be reduced further. We disagree with this and consider that the appraisal assumptions are robust, evidenced and do not require adjustment. As a result the viability results as they presently stand provide a realistic and informed assessment of viability in St Helens.

9.0 CONCLUSIONS

- 9.1 We have considered the TR and as appropriate provided a response in relation to the requests for clarification and further information. The answer in relation to a number of the points raised was self-evident from the content of the EVA however we have sought to further clarify matters for the benefit of all parties.
- 9.2 The TR contains assertions in relation to a number of the appraisal assumptions adopted in the EVA including:
- a) Gross to net developable area;
 - b) Greenfield benchmark land values;
 - c) The value of affordable home ownership units;
 - d) Base construction cost plus preliminaries at £90 per sq.ft;
 - e) Profit for small housing schemes at 20% of GDV;
 - f) Profit for commercial schemes at 20% of cost.
- 9.3 However no evidence is provided in support of these assertions to allow fully informed consideration of the point made. We are content that the evidence on which the EVA is based fully supports our approach to these variables. As a result we do not consider that there is justification for any changes to the appraisal inputs and hence the viability testing that has been undertaken as part of the EVA. Having reviewed the comments contained in the TR our conclusions therefore remain unchanged.

APPENDIX 1

BRIEFING NOTE DATABASE & CONSTRUCTION COST ASSESSMENT

BRIEFING NOTE

DATABASE & CONSTRUCTION COST ASSESSMENT

ST HELENS LOCAL PLAN

ECONOMIC VIABILITY ASSESSMENT

JUNE | 2020

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	DATABASE.....	2
3.0	CONSTRUCTION COST ASSESSMENTS	6
4.0	COMPARISON WITH DATABASE.....	7
5.0	CONCLUSIONS	9

APPENDICES

Appendix A	Overall Dataset
Appendix B	St Helens only Dataset
Appendix C	Generic Construction Costs
Appendix D	Scale Factors
Appendix E	Generic Construction Cost Comparison to Database
Appendix F	Allocations Construction Cost Comparison to Database

1.0 INTRODUCTION

- 1.1 Following consultation undertaken in relation to the St Helens Local Plan Economic Viability Assessment (December 2018) (EVA), responses have been received from Turley (on behalf of Peel) and Grasscroft (GDS) (on behalf of Taylor Wimpey). With reference to the comments received regarding the Report of Construction Cost (RCC) contained at Appendix 5 of the EVA, this briefing note has been prepared to provide further detail in relation to the Database of Construction Costs that we hold and the generic construction cost assessments used in the EVA.

2.0 DATABASE

- 2.1 As noted at paragraphs 1.5 and 1.6 of the RCC we have an extensive database of local construction costs derived from information provided to us by housebuilders actively undertaking development in St Helens and the wider North West Region. The database as a whole contains approximately 230 schemes predominantly relating to new housing developments undertaken by private house builders in the region. There are within these schemes also data from housing association developments, together with schemes of conversion, refurbishment and also apartments.
- 2.2 Paragraphs 2.10 and 2.11 of the RCC explain this information has been analysed and adjusted for location and date to enable applicability for the purpose of the EVA. As noted at paragraph 2.11 the information contained in the database is confidential and hence cannot be published in its full form.
- 2.3 We have noted the responses from Turley and GDS requiring that further information in relation to the database should be made available. We have therefore provided more detailed information from the database alongside this note. In doing so we are mindful of the confidential nature of this information and hence the presentation of the data seeks to ensure that no matters of breach of confidentiality arise.
- 2.4 We have provided at **Appendix A** the overall dataset that has been used to inform the RCC. To ensure comparability with the type of development anticipated to come forward in St Helens, (and as adopted for the purpose of testing in the EVA) we have considered only those new developments which are for houses or bungalows and include less than 20% of the total number of dwellings as flats. We have excluded a small number of developments which we consider are outliers for various reasons. The information from developments of affordable dwellings by Registered Providers has also been excluded as this is not directly comparable with the form of market housing development on which the EVA testing is based.

- 2.5 The dataset includes 171 schemes which vary in size from 4 dwellings to 1,322 dwellings. We have banded the developments with reference to number of dwellings and table 1 contains details of the bands together with the number developments in each size band.

No Dwellings	No Schemes
0-24	51 no
25-49	35 no
50-74	20 no
75-99	19 no
100-149	20 no
150-225	14 no
226-500	7 no
Over 500	5 no
Total	171 no

Table 1: Ranking of Developments by Unit Number

- 2.6 The dataset at Appendix A is presented and analysed with reference to these size bands.
- 2.7 The information that we have recorded is regarded in all cases as commercially confidential. In some cases we have entered into Confidentiality Agreements that preclude us from disclosing data that is identifiable to either the development or developer. We have therefore respected the general principle of confidentiality in all cases.
- 2.8 In presenting the data at Appendix A we have therefore removed details of the name of the development, developer and the number of dwellings to ensure that no issues of confidentiality arise. To put the information into context we have however provided details of the developer type. These fall into 5 main categories – landowner, promoter and then local, regional and national housebuilder. Typically the landowner and promoter data will relate to outline planning applications, whilst the local, regional and national housebuilder data will be submitted in connection with reserved matters or full planning applications, and to a lesser degree assessments in relation to development agreements or for grant purposes.
- 2.9 The data then includes details of the following:
- Development location (Local Authority);
 - Date of our work on the viability assessment;
 - The total number of dwellings (Banded);
 - The total gross internal floor area of the dwellings (Banded).

- 2.10 We have then provided details of the developer's costs for substructures and superstructures, preliminaries, external works within and beyond curtilage, drainage, incoming services, abnormal development costs, fees and contingencies. These are the total costs which have been updated (to Q3 2018) and adjusted for location (St Helens) using BCIS Tender Price Index and location factors.
- 2.11 The dataset includes analysis of the professional fees and contingencies as a percentage of the total cost. Also provided is the overall total cost excluding abnormal costs but including professional fees and contingencies and then the overall cost per sq.m based on the total floorspace.
- 2.12 There is no standardised method or headings for providing cost information within the industry and different developers will account for the same type of costs under different headings. This is evident from the entries in the database where for example some of the developments have preliminaries, external works, drainage and services included within an overall rate which has been allocated to the base subs and superstructures. In some cases, often when detailed cost plans are provided, the financial appraisal does not include a separate contingency sum, and an element of contingency is included within the figures under each of the individual cost headings.
- 2.13 Given the different approaches to reporting cost information, the most appropriate measure of cost derived from the database is the overall total cost per sq.m excluding abnormals. Hence this has been provided in the analysis.
- 2.14 Within each size band the data analysis also includes the average and median total cost (excluding abnormals) per sq.m together with the average fee and contingency allowance. The average cost is assessed by taking the total floor area of all the developments being considered and dividing this into the sum of the total costs (exc abnormals) of those developments. We do not average the cost per sq.m from each development as this would be an average of averages which would be incorrect.
- 2.15 In addition we have extracted the data for the developments in St Helens from the main dataset and this is included in **Appendix B**. This includes costs from 46 developments.
- 2.16 It should be noted that the costs included in the dataset are those that have been submitted by the developers or their agents initially in support of the viability case. We have not made any adjustments to these figures in the dataset to reflect the fact that in many cases, due to our work with regard to viability, costs have eventually been agreed for the particular assessment at lower levels.

Dataset Summary

- 2.17 For completeness we have provided at table 2 a summary of the analysis from the overall dataset, and at table 3 for St Helens only data. This includes details of the average and median total cost per sq.m (ex abnormals) together with the range and the average fees and contingency for each band.

Band	Average (per sq.m)	Median (per sq.m)	No Scheme s	Range		Average	
				Min	Max	Fees	Cont
0-24	£1,310	£1,309	51 no	£776	£2,089	6.34%	3.15%
25-49	£1,285	£1,240	35 no	£976	£1,723	6.02%	3.22%
50-74	£1,147	£1,121	20 no	£859	£1,436	4.97%	2.48%
75-99	£1,189	£1,212	19 no	£846	£1,408	5.80%	3.28%
100-149	£1,162	£1,186	20 no	£713	£1,457	5.79%	4.07%
150-225	£1,199	£1,211	14 no	£1,014	£1,363	5.32%	3.65%
226-500	£1,171	£1,148	7 no	£952	£1,341	4.71%	1.91%
>500	£1,200	£1,157	5 no	£1,015	£1,359	5.63%	3.17%

Table 2: Overall Dataset Analysis

Band	Average (per sq.m)	Median (per sq.m)	No Scheme s	Range		Average	
				Min	Max	Fees	Cont
0-24	£1,261	£1,240	23 no	£776	£1,814	5.55%	1.85%
25-49	£1,516	£1,516	1 no	£1,516	£1,516	4.70%	4.03%
50-74	£1,120	£1,113	5 no	£986	£1,217	5.50%	3.34%
75-99	£1,070	£1,104	7 no	£846	£1,240	5.74%	3.03%
100-149	£1,228	£1,215	5 no	£1,136	£1,439	6.03%	4.49%
150-225	£1,193	£1,235	3 no	£1,014	£1,333	3.73%	3.09%
226-500	£952	£952	1 no	£952	£952	2.64%	0.00%
>500	£1,359	£1,359	1 no	£1,359	£1,359	10.15%	7.52%

Table 3: St Helens Dataset Analysis

3.0 CONSTRUCTION COST ASSESSMENTS

- 3.1 Paragraphs 2.10 – 2.42 of the RCC contain details of the methodology adopted in preparing the construction cost assessments. We provided the construction cost assessments for the allocations in Appendix D of the RCC whilst in relation to the generic construction cost assessments, Appendix B of the RCC contained details of the overall rate per sq.m that was assessed.
- 3.2 The consultation responses have sought further detail in relation to these generic costs and we have provided at **Appendix C** a breakdown of the respective rates per sq.m utilised for the respective generic construction cost assessments.
- 3.3 The breakdown also contains details of the professional fees and contingency allowance in each case. We have also shown the adjustment that has been made for scale. BCIS publish scale factors that represent cost variance with development size, with larger developments benefiting from economies of scale and hence pro-rata being cheaper to develop. Details of the scale factors are contained at **Appendix D**. This shows the range of index change with contract size and is readily available from the BCIS website. With reference to this data the reduction shown for a contract of £47m (approx 450 dwellings) is 11%. Overall the development construction costs used in the EVA range from about £650,000 for 5 dwellings to £300,000,000 for the largest allocation at Bold Forest. This range exceeds the range considered by BCIS.
- 3.4 We have been more generous in the application of scale factors to the generic costs which means that the base costs are increased for the smaller developments, and then reduced only by 1.5% for the two largest developments of 100 and 200 dwellings. Contractors profit is excluded from the costs to avoid double counting with the developers profit contained in the financial appraisal.
- 3.5 In reviewing this information it has become apparent that the construction costs for the allocations are in fact overstated. Professional fees have been included at 7.5% throughout rather than at 5%, and the allowance for scale (over 200 dwellings) should have been a reduction of 2.5%, rather than 1% which is the level that was included in the allocations cost assessments. As a result the cost assessments for the allocations are overstated by about 4% (2.5% for fees and 1.5% for scale) with the result that the costs are therefore extremely robust for the purpose of assessing viability.

4.0 COMPARISON WITH DATABASE

- 4.1 For completeness we have also provided a comparison of the construction costs (generic and allocations) contained in the RCC with the costs contained in our database. To enable a comparison on a like for like basis we have used the total costs per sq.m for the generic greenfield sites only, which are then compared directly with the total costs per sq.m excluding abnormals from the database. The generic cost assessments for the brownfield sites include costs for some additional abnormal works so are not directly comparable for the purpose of this exercise.
- 4.2 As noted previously different Developers express costs in different ways and provide different levels of detail, as can be seen from our dataset. We have therefore made comparisons between the total costs of the development including preliminaries, garages, external works within and beyond curtilage, drainage and incoming services with fees and contingencies but excluding any abnormal development costs.
- 4.3 We have provided at **Appendix E** the respective cost data. For each greenfield typology the total rate per sq.m is compared to the average and median total cost per sq.m from the relevant size band in the dataset. For completeness we have also included details of the minimum and maximum cost in that band. The information is provided in relation to the overall dataset and then St Helens only.
- 4.4 In undertaking benchmarking exercises the median rather than the average is typically used, as the median represents the middle value in the range and is essentially unaffected by outliers whether high or low unlike the average.
- 4.5 With reference to the data contained in Appendix E, the generic construction cost assessments contained in the RCC are supported by the costs in the dataset. In the majority of cases the generic costs are close to or in excess of the median both for the overall data set and St Helens only.
- 4.6 The costs for the 200 dwelling typology are c 4% lower than shown by our dataset. We consider that this is not unreasonable. As we have noted above the database includes the costs as presented by Developers and we have not made amendments to these costs notwithstanding that in some cases they have been reduced following discussions with the developer.

- 4.7 Also the range of costs for developments in each category (including at 200 dwellings) is very wide. The fact that some Developers can construct for costs substantially lower than being suggested by other Developers is difficult to reconcile. There will be an element of specification difference that underlies this but that will not, in itself, be sufficient to account for the wide range. Again the very small differences between our assessed costs and the median dataset costs is much less than the range of development costs shown in the dataset at 200 dwellings. Our costs do however fall well within the overall range.
- 4.8 A comparison with developments in St Helens has also been made and the generic costs compared with the average and median values from that dataset. The number of developments is reduced from those in the full dataset and in some categories there is only a single development, namely for the bands 25-49, 226-500 and over 500 hence any comparison in relation to these bands needs to be treated with a degree of caution.
- 4.9 For completeness we have provided at **Appendix F** a comparison of the allocations cost assessments with the data base. We have provided details of the total rate per sq.m excluding abnormals and compared this to the median and average figures from the data base in the respective size band. In all cases the respective cost rate for the allocations exceeds the median figure from the dataset.

5.0 CONCLUSIONS

- 5.1 In response to the request for further information both in relation to the database and the generic construction costs, we have provided details of the overall dataset and then that for St Helens at **Appendix A** and **B** respectively. The data has been presented to respect requirements for confidentiality however is sufficiently detailed to enable assessment of the entries and comparison with the construction cost assessments contained in the RCC.
- 5.2 In addition we have also provided a breakdown of the generic construction cost assessments which is contained at **Appendix C**. For completeness we have provided a comparison of the analysis from the dataset with the construction costs in the RCC (both generic and allocations) and this is contained at **Appendix E** and **F** respectively. With reference to the median and average rates from the respective size bands in the dataset, the construction costs assessments are consistent with these rates and in many cases, particularly for the allocations, exceed the evidence of costs from our database.
- 5.3 The dataset that we have used is based on local market information from market housing schemes in the northwest, typical of the form of development that will take place in St Helens during the plan period on which our testing is based. In the context of the requirements of the PPG, our assessment of costs is based on appropriate data namely evidence of costs reflective of local market conditions. The cost assessments that have been prepared are consistent with the local market data and in some exceed this data, as a result the construction cost assessments contained in the RCC are reasonable and robust for the purpose of assessing viability in St Helens for the purpose of the Local Plan.

Keppie Massie

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KEPPIE MASSIE LTD

DATE: 8 JUNE 2020

Ref: AGM/JA/RC

APPENDIX A

OVERALL DATASET

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																	
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2				
Schemes 0 - 24 dwellings																						
Local	St Helens	10/2017	0 - 24	500 - 1000	£ 656,416	£ -	£ -	£ -	£ -	£ -	£ 25,600	£ 22,200	£ -		3.26%	0.00%	£ 677,783	£ 799				
Local	St Helens	02/2014	0 - 24	500 - 1000	£ 489,913	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		0.00%	0.00%	£ 489,913	£ 776				
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 659,838	£ -	£ -	£ -	£ -	£ -	£ 151,968	£ -	£ -		0.00%	0.00%	£ 659,838	£ 846				
Local	Cheshire East	04/2017	0 - 24	2000 - 2500	£ 1,916,255	£ -	£ -	£ -	£ -	£ -	£ 333,456	£ 172,899	£ 76,651		7.69%	3.41%	£ 2,133,833	£ 969				
Local	St Helens	09/2015	0 - 24	1500 - 2000	£ 1,218,613	£ 137,301	£ -	£ 94,459	£ -	£ -	£ 41,888	£ 205,094	£ 84,867		13.74%	5.69%	£ 1,743,531	£ 1,057				
Local	Cheshire East	12/2017	0 - 24	1000 - 1500	£ 988,906	£ 13,663	£ 33,771	£ 122,964	£ -	£ 13,663	£ -	£ -	£ -		0.00%	0.00%	£ 1,172,967	£ 897				
Landowner	St Helens	12/2017	0 - 24	1000 - 1500	£ 1,022,142	£ -	£ -	£ -	£ 255,536	£ -	£ 19,321	£ 127,768	£ 42,743		9.85%	3.30%	£ 1,449,796	£ 1,030				
Local	Allerdale	04/2017	0 - 24	2500 - 3000	£ 1,761,549	£ 307,110	£ 171,659	£ 139,686	£ 108,954	£ 86,530	£ 346,159	£ 294,104	£ 56,354		10.07%	1.93%	£ 2,889,425	£ 1,051				
Local	St Helens	06/2016	0 - 24	500 - 1000	£ 619,640	£ 6,660	£ -	£ -	£ -	£ 19,979	£ -	£ 24,973	£ -		3.86%	0.00%	£ 671,252	£ 978				
Local	Allerdale	12/2017	0 - 24	1000 - 1500	£ 1,158,313	£ -	£ -	£ -	£ -	£ -	£ 31,579	£ 115,831	£ 88,876		9.73%	7.47%	£ 1,366,009	£ 1,125				
Local	St Helens	04/2016	0 - 24	0 - 500	£ 446,236	£ -	£ -	£ -	£ 6,105	£ -	£ 53,277	£ 27,310	£ 8,925		5.40%	1.77%	£ 485,188	£ 1,055				
Local	Wyre	02/2015	0 - 24	1000 - 1500	£ 1,142,566	£ -	£ 22,721	£ 52,862	£ -	£ 48,689	£ -	£ 56,455	£ 84,209		4.46%	6.65%	£ 1,411,255	£ 1,102				
Local	Hambleton	02/2017	0 - 24	2000 - 2500	£ 2,179,807	£ -	£ 102,358	£ -	£ -	£ -	£ 258,051	£ 149,200	£ 124,333		5.87%	4.89%	£ 2,534,471	£ 1,177				
Regional	St Helens	04/2017	0 - 24	2000 - 2500	£ 2,510,084	£ -	£ -	£ -	£ -	£ -	£ 453,733	£ 177,190	£ 72,029		5.98%	2.43%	£ 2,724,797	£ 1,153				
Local	Sefton	11/2016	0 - 24	1500 - 2000	£ 1,374,051	£ 232,238	£ 128,817	£ -	£ -	£ 73,855	£ 99,297	£ 177,317	£ 107,348		9.29%	5.63%	£ 2,088,270	£ 1,267				
Local	St Helens	10/2016	0 - 24	500 - 1000	£ 940,106	£ -	£ 121,661	£ -	£ -	£ 44,240	£ 50,876	£ 91,411	£ 54,847		7.90%	4.74%	£ 1,249,977	£ 1,255				
Local	St Helens	01/2017	0 - 24	1500 - 2000	£ 1,125,567	£ 322,663	£ 199,341	£ -	£ -	£ 70,898	£ -	£ 85,919	£ 88,550		5.00%	5.15%	£ 1,897,364	£ 1,226				
Regional	St Helens	11/2013	0 - 24	500 - 1000	£ 908,551	£ -	£ 91,674	£ -	£ -	£ -	£ 292,701	£ 93,474	£ 45,427		7.23%	3.51%	£ 1,110,222	£ 1,240				
Local	High Peak	11/2018	0 - 24	1000 - 1500	£ 822,399	£ 138,480	£ 115,400	£ -	£ 23,080	£ 34,620	£ 11,540	£ 123,898	£ 57,700		10.82%	5.04%	£ 1,319,925	£ 1,309				
Landowner	St Helens	07/2016	0 - 24	1000 - 1500	£ 1,422,272	£ -	£ -	£ 218,675	£ -	£ -	£ -	£ 113,782	£ 35,557		6.93%	2.17%	£ 1,792,751	£ 1,231				
Local	St helens	07/2016	0 - 24	1000 - 1500	£ 1,435,948	£ -	£ -	£ 220,777	£ -	£ -	£ 44,141	£ 114,876	£ 35,899		6.75%	2.11%	£ 1,805,948	£ 1,229				
Local	Wyre	03/2016	0 - 24	1000 - 1500	£ 958,622	£ 146,952	£ 154,019	£ 28,455	£ -	£ -	£ 105,851	£ 71,705	£ 74,157		5.14%	5.32%	£ 1,426,358	£ 1,277				
Regional	Wyre	05/2015	0 - 24	1500 - 2000	£ 1,920,854	£ -	£ -	£ 288,128	£ -	£ -	£ 118,480	£ 154,629	£ 66,270		6.64%	2.85%	£ 2,422,815	£ 1,278				
Landowner	South Ribble	04/2018	0 - 24	1500 - 2000	£ 1,897,249	£ -	£ -	£ 189,725	£ -	£ -	£ 249,255	£ 179,310	£ 94,863		7.68%	4.06%	£ 2,338,399	£ 1,309				
Local	Cheshire East	02/2017	0 - 24	1000 - 1500	£ 1,116,882	£ 1,608	£ -	£ 80,399	£ 21,440	£ 67,162	£ 160,799	£ 142,548	£ 72,441		9.84%	5.00%	£ 1,484,949	£ 1,350				
Local	Knowsley	11/2015	0 - 24	1000 - 1500	£ 933,895	£ 62,531	£ -	£ 163,912	£ 142,597	£ 50,621	£ -	£ 192,180	£ -		14.20%	0.00%	£ 1,545,736	£ 1,346				
Local	Wyre	08/2015	0 - 24	1000 - 1500	£ 776,100	£ 167,554	£ -	£ 213,049	£ 69,814	£ -	£ 89,595	£ 82,404	£ -		6.26%	0.00%	£ 1,303,312	£ 1,254				
Regional	Cheshire EAs	11/2015	0 - 24	1000 - 1500	£ 1,745,133	£ -	£ -	£ -	£ -	£ -	£ 433,291	£ 174,274	£ 108,921		8.00%	5.00%	£ 1,978,980	£ 1,360				
Local	Wirral	10/2018	0 - 24	1000 - 1500	£ 1,368,442	£ -	£ -	£ -	£ -	£ -	£ 188,595	£ 108,993	£ 77,852		7.00%	5.00%	£ 1,537,444	£ 1,350				
Landowner	St helens	04/2016	0 - 24	500 - 1000	£ 858,118	£ 41,622	£ 81,580	£ -	£ -	£ -	£ 131,527	£ 76,813	£ 24,576		6.90%	2.21%	£ 1,072,222	£ 1,339				
Local	Wyre	06/2016	0 - 24	2500 - 3000	£ 2,560,495	£ -	£ -	£ -	£ 512,099	£ -	£ 321,857	£ 256,050	£ 76,815		7.54%	2.26%	£ 3,379,142	£ 1,349				
Local	St Helens	06/2013	0 - 24	500 - 1000	£ 725,903	£ 15,915	£ 3,316	£ -	£ -	£ 15,915	£ -	£ 22,547	£ -		2.96%	0.00%	£ 783,596	£ 1,276				
Local	St Helens	11/2013	0 - 24	0 - 500	£ 513,320	£ -	£ -	£ -	£ -	£ -	£ 10,477	£ -	£ -		0.00%	0.00%	£ 513,320	£ 1,252				
Local	Knowsley	11/2015	0 - 24	1000 - 1500	£ 933,895	£ 62,531	£ 163,912	£ -	£ 142,597	£ 50,621	£ -	£ 192,180	£ -		14.20%	0.00%	£ 1,545,736	£ 1,439				
Landowner	Cheshire East	10/2015	0 - 24	1000 - 1500	£ 1,133,061	£ 165,503	£ -	£ -	£ 216,975	£ -	£ -	£ 85,262	£ 94,304		5.63%	6.22%	£ 1,700,410	£ 1,422				
Local	Lancaster	10/2015	0 - 24	1500 - 2000	£ 1,781,725	£ -	£ -	£ 379,704	£ 164,771	£ 79,161	£ 597,130	£ 246,764	£ 149,580		8.22%	4.98%	£ 2,732,729	£ 1,449				
Landowner	Lancaster	06/2017	0 - 24	2000 - 2500	£ 2,436,778	£ -	£ 131,393	£ 150,128	£ 154,536	£ 60,431	£ 631,909	£ 127,016	£ 141,209		3.56%	3.96%	£ 3,158,088	£ 1,393				
Local	Cheshire East	09/2014	0 - 24	0 - 500	£ 600,558	£ -	£ -	£ -	£ -	£ -	£ -	£ 63,059	£ 30,027		10.50%	5.00%	£ 696,797	£ 1,548				
Regional	Cheshire EAs	01/2014	0 - 24	1500 - 2000	£ 1,989,587	£ -	£ 364,046	£ -	£ 95,965	£ 51,733	£ 732,829	£ 187,105	£ 112,717		5.79%	3.49%	£ 2,738,261	£ 1,467				
Local	St Helens	10/2016	0 - 24	1000 - 1500	£ 1,953,485	£ -	£ -	£ -	£ -	£ -	£ 196,869	£ 160,967	£ 58,605		7.49%	2.73%	£ 2,156,940	£ 1,526				
Landowner	St Helens	09/2016	0 - 24	1500 - 2000	£ 2,069,469	£ -	£ 212,121	£ -	£ -	£ -	£ 57,326	£ 165,099	£ 51,737		7.06%	2.21%	£ 2,496,674	£ 1,529				
Local	Sefton	06/2014	0 - 24	1500 - 2000	£ 2,309,539	£ -	£ -	£ -	£ -	£ -	£ 428,709	£ 273,825	£ 241,686		10.00%	8.83%	£ 2,764,725	£ 1,687				
Local	St Helens	07/2014	0 - 24	500 - 1000	£ 842,520	£ -	£ -	£ -	£ 53,315	£ -	£ 65,883	£ 98,650	£ -		10.26%	0.00%	£ 987,727	£ 1,598				
Local	St Helens	12/2012	0 - 24	500 - 1000	£ 566,151	£ 201,082	£ 16,312	£ -	£ -	£ 48,417	£ -	£ -	£ -		0.00%	0.00%	£ 831,962	£ 1,454				
Local	Fylde	11/2018	0 - 24	1000 - 1500	£ 1,977,353	£ -	£ -	£ -	£ -	£ -	£ -	£ 24,030	£ 71,809		1.22%	3.63%	£ 2,074,065	£ 1,605				
Regional	Knowsley	02/2014	0 - 24	500 - 1000	£ 921,679	£ 209,803	£ 163,416	£ 70,502	£ -	£ 123,493	£ 185,107	£ -	£ 24,266		0.00%	1.45%	£ 1,510,476	£ 1,602				
Local	South Ribble	02/2016	0 - 24	1000 - 1500	£ 1,673,667	£ 13,055	£ -	£ 80,154	£ -	£ 59,595	£ 27,798	£ 40,659	£ -		2.19%	0.00%	£ 1,86					

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																		
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2					
Schemes 25 - 49 dwellings																							
National	Sefton	04/2017	24 - 49	2500 - 3000	£ 2,322,131	£ -	£ -	£ -	£ -	£ -	£ 480,539	£ 196,187	£ 140,133		7.00%	5.00%	£ 2,608,914	£ 1,006					
Landowner	Wyre	01/2017	24 - 49	4000 - 4500	£ 2,720,706	£ 504,161	£ 274,558	£ -	£ -	£ 210,067	£ 823,194	£ 183,179	£ 129,120		4.04%	2.85%	£ 3,969,344	£ 976					
National	Knowsley	09/2012	24 - 49	3000 - 3500	£ 3,266,228	£ -	£ -	£ -	£ -	£ -	£ 1,073,375	£ 261,298	£ 97,987		6.02%	2.26%	£ 3,541,086	£ 1,098					
Local	Hyndburn	01/2017	24 - 49	2000 - 2500	£ 2,430,142	£ -	£ -	£ -	£ -	£ -	£ 989,879	£ 255,164	£ 121,507		7.46%	3.55%	£ 2,704,232	£ 1,136					
Landowner	High Peak	12/2015	24 - 49	2500 - 3000	£ 2,228,020	£ -	£ -	£ -	£ 646,712	£ -	£ 766,202	£ 286,873	£ 111,401		7.88%	3.06%	£ 3,196,123	£ 1,142					
National	Hyndburn	12/2017	24 - 49	4000 - 4500	£ 4,493,308	£ -	£ -	£ -	£ -	£ -	£ 911,801	£ 351,332	£ 108,102		6.50%	2.00%	£ 4,881,081	£ 1,130					
National	Wyre	07/2018	24 - 49	3000 - 3500	£ 2,728,043	£ -	£ -	£ 471,043	£ -	£ 116,500	£ 319,400	£ 163,683	£ 81,841		4.50%	2.25%	£ 3,542,898	£ 1,116					
Landowner	High Peak	04/2014	24 - 49	2000 - 2500	£ 2,112,138	£ -	£ 71,247	£ -	£ 338,685	£ 90,762	£ 374,394	£ 289,014	£ 224,042		9.68%	7.50%	£ 3,080,546	£ 1,236					
Landowner	Wyre	03/2016	24 - 49	3500 - 4000	£ 3,890,093	£ -	£ -	£ -	£ -	£ -	£ 400,640	£ 214,537	£ 300,351		5.00%	7.00%	£ 4,370,520	£ 1,193					
Landowner	Fylde	05/2017	24 - 49	2500 - 3000	£ 1,989,661	£ 382,556	£ 297,437	£ 228,577	£ -	£ 143,458	£ 382,848	£ 202,223	£ 99,484		5.91%	2.91%	£ 3,314,884	£ 1,158					
Regional	Wyre	10/2018	24 - 49	2500 - 3000	£ 2,083,258	£ 275,562	£ 551,087	£ 338,588	£ -	£ -	£ 521,518	£ 178,092	£ 118,443		4.72%	3.14%	£ 3,508,832	£ 1,174					
Regional	South Ribble	06/2016	24 - 49	4000 - 4500	£ 4,388,681	£ -	£ -	£ -	£ -	£ -	£ 490,565	£ 263,320	£ 209,285		5.40%	4.29%	£ 4,823,929	£ 1,202					
National	West Lancs	05/2013	24 - 49	2500 - 3000	£ 2,813,393	£ -	£ -	£ 278,650	£ -	£ -	£ 660,377	£ 225,071	£ 140,670		6.00%	3.75%	£ 3,400,370	£ 1,208					
National	West Lancs	08/2016	24 - 49	3000 - 3500	£ 3,049,772	£ -	£ -	£ 446,617	£ 130,703	£ -	£ 238,855	£ 182,987	£ 152,488		4.73%	3.94%	£ 3,948,612	£ 1,198					
Regional	High Peak	12/2014	24 - 49	3000 - 3500	£ 3,706,685	£ -	£ -	£ -	£ -	£ -	£ 493,676	£ 311,361	£ 185,334		7.41%	4.41%	£ 4,157,127	£ 1,237					
Regional	Knowsley	09/2013	24 - 49	4000 - 4500	£ 4,529,650	£ 313,042	£ -	£ -	£ -	£ -	£ 743,788	£ 362,372	£ 226,483		6.49%	4.05%	£ 5,365,882	£ 1,240					
Local	Hyndburn	10/2018	24 - 49	3500 - 4000	£ 4,227,152	£ -	£ -	£ -	£ -	£ -	£ 859,591	£ 406,939	£ 211,357		8.00%	4.16%	£ 4,755,016	£ 1,271					
Regional	Cheshire East	11/2016	24 - 49	2000 - 2500	£ 1,511,078	£ 249,938	£ 528,454	£ 283,563	£ -	£ -	£ 357,283	£ 152,476	£ 92,377		5.20%	3.15%	£ 2,792,253	£ 1,227					
Local	High Peak	08/2018	24 - 49	2500 - 3000	£ 3,276,245	£ -	£ -	£ -	£ -	£ -	£ 2,111,248	£ 261,553	£ 174,368		4.85%	3.24%	£ 3,546,486	£ 1,238					
Local	West Lancs	08/2016	49 - 74	4500 - 5000	£ 5,342,629	£ -	£ -	£ -	£ -	£ -	£ 659,189	£ 420,127	£ 300,091		7.00%	5.00%	£ 6,002,444	£ 1,296					
Local	Wirral	03/2018	24 - 49	4000 - 4500	£ 5,075,744	£ -	£ -	£ -	£ -	£ -	£ 1,058,851	£ 460,094	£ 306,730		7.50%	5.00%	£ 5,729,246	£ 1,334					
Landowner	Knowsley	11/2016	24 - 49	3500 - 4000	£ 4,157,646	£ -	£ -	£ 114,057	£ -	£ -	£ -	£ 415,765	£ 207,584		9.73%	4.86%	£ 4,915,256	£ 1,381					
Local	Sefton	09/2014	24 - 49	3000 - 3500	£ 3,192,244	£ -	£ 292,602	£ -	£ 335,166	£ 137,121	£ 321,159	£ 299,695	£ 159,616		7.01%	3.73%	£ 4,392,307	£ 1,335					
National	Wirral	03/2018	24 - 49	2500 - 3000	£ 1,697,082	£ 602,437	£ 349,507	£ 426,902	£ -	£ 117,870	£ 36,906	£ 141,891	£ -		4.39%	0.00%	£ 3,334,069	£ 1,267					
Local	Wyre	08/2014	24 - 49	2500 - 3000	£ 2,229,778	£ 433,151	£ 445,956	£ 338,880	£ -	£ -	£ 362,847	£ 138,688	£ 79,351		3.64%	2.08%	£ 3,647,655	£ 1,296					
Local	Fylde	03/2018	24 - 49	3000 - 3500	£ 2,692,003	£ 523,712	£ -	£ 863,367	£ -	£ 175,888	£ 791,259	£ 280,152	£ 218,213		5.55%	4.32%	£ 4,685,406	£ 1,356					
National	Liverpool	04/2013	24 - 49	4000 - 4500	£ 2,905,368	£ 1,000,830	£ 502,326	£ 445,578	£ 240,787	£ 237,190	£ 497,422	£ 290,394	£ 61,112		4.98%	1.05%	£ 5,656,374	£ 1,359					
Local	Wirral	07/2018	24 - 49	3500 - 4000	£ 5,115,158	£ -	£ -	£ -	£ -	£ -	£ -	£ 613,739	£ 255,858		12.00%	5.00%	£ 6,015,453	£ 1,532					
Landowner	Sefton	03/2016	24 - 49	3000 - 3500	£ 3,823,196	£ 143,612	£ -	£ -	£ 552,353	£ -	£ 157,421	£ 350,744	£ 233,829		7.50%	5.00%	£ 5,101,003	£ 1,493					
Local	St Helens	07/2012	24 - 49	1500 - 2000	£ 2,091,065	£ 147,377	£ -	£ 231,592	£ -	£ -	£ 666,704	£ 147,377	£ 126,323		4.70%	4.03%	£ 2,690,232	£ 1,516					
Regional	Hyndburn	12/2017	24 - 49	2500 - 3000	£ 2,577,629	£ -	£ 119,771	£ 1,003,881	£ -	£ -	£ 1,133,146	£ 156,944	£ -		3.25%	0.00%	£ 3,821,439	£ 1,442					
Local	Allerdale	05/2017	24 - 49	4000 - 4500	£ 4,491,336	£ 167,819	£ 602,728	£ 145,033	£ -	£ 332,879	£ 835,235	£ 555,121	£ -		8.44%	0.00%	£ 6,224,398	£ 1,517					
Local	Fylde	11/2013	24 - 49	2000 - 2500	£ 2,745,682	£ -	£ 701,487	£ -	£ -	£ -	£ 538,059	£ 152,716	£ -		3.83%	0.00%	£ 3,579,267	£ 1,490					
Regional	Fylde	02/2017	24 - 49	5000 - 5500	£ 4,921,346	£ 635,488	£ 438,735	£ 1,230,965	£ -	£ 157,870	£ 118,818	£ 193,678	£ -		2.58%	0.00%	£ 7,575,014	£ 1,486					
Local	Allerdale	02/2013	24 - 49	2000 - 2500	£ 3,255,784	£ -	£ -	£ 463,100	£ -	£ -	£ -	£ 62,464	£ -		1.68%	0.00%	£ 3,781,347	£ 1,723					
																	Average	£ 1,285	35 no Median £1,240				
Schemes 50 - 74 dwellings																							
National	Rochdale	01/2014	49 - 74	8500 - 9000	£ 4,958,498	£ 1,120,514	£ 630,054	£ 471,684	£ -	£ 236,034	£ 2,560,554	£ 274,019	£ -		2.75%	0.00%	£ 7,620,480	£ 859					
Regional	Allerdale	10/2017	49 - 74	7500 - 8000	£ 5,928,273	£ -	£ -	£ 833,321	£ -	£ -	£ 2,151,566	£ 327,404	£ 287,606		3.67%	3.23%	£ 7,236,160	£ 943					
National	St Helens	05/2017	49 - 74	3500 - 4000	£ 2,759,182	£ -	£ -	£ 41,338	£ 262,166	£ 127,035													

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals																	
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2				
Schemes 75 - 99 dwellings																						
Regional	St helens	05/2017	74 - 99	7500 - 8000	£ 4,933,060	£ 533,549	£ 157,778	£ 490,586	£ 5,313	£ -	£ 2,251,775	£ 394,645	£ 246,566		4.71%	2.95%	£ 6,597,531	£ 855				
National	St Helens	12/2017	74 - 99	6500 - 7000	£ 3,159,998	£ 823,826	£ 889,043	£ -	£ 402,024	£ 202,870	£ 752,023	£ 261,477	£ -		4.20%	0.00%	£ 5,707,674	£ 846				
Landowner	Knowsley	04/2017	74 - 99	9000 - 9500	£ 7,955,308	£ -	£ -	£ 796,027	£ -	£ -	£ 2,346,042	£ 477,319	£ 397,765		4.30%	3.58%	£ 9,454,913	£ 1,021				
Promoter	St Helens	08/2017	74 - 99	6500 - 7000	£ 6,176,745	£ -	£ -	£ 308,837	£ 106,265	£ -	£ 620,832	£ 518,847	£ 216,381		7.19%	3.00%	£ 7,278,016	£ 1,090				
National	St Helens	04/2015	74 - 99	6500 - 7000	£ 6,663,527	£ -	£ -	£ -	£ -	£ -	£ 750,071	£ 481,884	£ 222,408		6.50%	3.00%	£ 7,309,556	£ 1,104				
National	Cheshire EAsT	01/2016	74 - 99	8000 - 8500	£ 8,476,678	£ -	£ -	£ -	£ -	£ -	£ 1,776,227	£ 717,703	£ 512,645		7.00%	5.00%	£ 9,523,548	£ 1,163				
National	St Helens	04/2014	74 - 99	6500 - 7000	£ 7,446,906	£ -	£ -	£ -	£ -	£ -	£ 860,661	£ 671,345	£ 419,590		8.08%	5.05%	£ 8,455,216	£ 1,212				
National	St Helens	11/2013	74 - 99	6500 - 7000	£ 6,529,066	£ -	£ 859,113	£ -	£ -	£ -	£ 2,247,969	£ 391,863	£ 368,189		4.07%	3.82%	£ 7,982,402	£ 1,155				
Regional	South Ribble	03/2018	74 - 99	8000 - 8500	£ 6,998,145	£ -	£ 355,837	£ 1,366,566	£ 460,796	£ 227,438	£ 1,190,982	£ 460,796	£ 268,454		4.54%	2.65%	£ 9,602,341	£ 1,165				
National	Liverpool	09/2014	74 - 99	8500 - 9000	£ 9,523,170	£ -	£ -	£ -	£ -	£ -	£ 2,096,413	£ 813,371	£ 580,979		7.00%	5.00%	£ 10,699,281	£ 1,242				
Regional	Cheshire East	09/2017	74 - 99	7000 - 7500	£ 8,175,207	£ -	£ -	£ -	£ -	£ -	£ 1,273,450	£ 490,512	£ 245,256		5.19%	2.60%	£ 8,822,828	£ 1,206				
Regional	Cheshire East	11/2016	74 - 99	7500 - 8000	£ 8,905,448	£ -	£ -	£ -	£ -	£ -	£ 1,631,383	£ 848,100	£ 445,273		8.05%	4.23%	£ 10,028,863	£ 1,267				
Regional	Cheshire EAsT	11/2016	74 - 99	8500 - 9000	£ 8,092,831	£ -	£ -	£ 1,515,682	£ 129,813	£ 234,228	£ 2,760,835	£ 771,201	£ 404,662		6.06%	3.18%	£ 10,912,663	£ 1,229				
National	West Lancs	11/2016	74 - 99	9500 - 10000	£ 11,096,783	£ -	£ -	£ -	£ -	£ -	£ 1,455,513	£ 878,661	£ 627,615		7.00%	5.00%	£ 12,467,236	£ 1,265				
Landowner	St Helens	10/2016	74 - 99	7000 - 7500	£ 5,958,298	£ 1,011,448	£ 435,833	£ -	£ 906,074	£ -	£ 516,118	£ 476,664	£ 297,915		5.40%	3.37%	£ 9,056,092	£ 1,240				
National	Wirral	01/2015	74 - 99	5500 - 6000	£ 3,907,530	£ 932,312	£ 919,230	£ 581,051	£ -	£ 347,778	£ 650,487	£ 447,068	£ 133,315		6.09%	1.82%	£ 7,224,240	£ 1,282				
National	West Lancs	10/2013	74 - 99	8500 - 9000	£ 8,123,221	£ -	£ -	£ 2,462,092	£ -	£ 369,314	£ 2,451,721	£ 649,857	£ 406,161		4.85%	3.03%	£ 11,833,611	£ 1,335				
National	Knowsley	06/2016	74 - 99	8500 - 9000	£ 11,238,425	£ -	£ -	£ -	£ -	£ -	£ 2,117,380	£ 934,906	£ 667,790		7.00%	5.00%	£ 12,626,370	£ 1,408				
Local	High Peak	05/2017	74 - 99	10000 - 10500	£ 11,259,305	£ 1,286,402	£ -	£ 462,736	£ -	£ 272,179	£ 851,621	£ 427,967	£ -		3.03%	0.00%	£ 13,682,799	£ 1,364				
																			19 no			
															5.80%	3.28%	Average	£ 1,189	Median £1,212			
Schemes 100 - 149 dwellings																						
National	Sefton	05/2016	99 - 124	8500 - 9000	£ 3,285,598	£ 1,013,827	£ 528,796	£ 753,830	£ -	£ 358,576	£ 3,167,054	£ 249,139	£ -		2.74%	0.00%	£ 6,103,131	£ 713				
Landowner	West Lancs	06/2017	99 - 124	10500 - 11000	£ 9,304,442	£ -	£ -	£ -	£ -	£ -	£ 2,552,972	£ 1,106,099	£ 930,445		9.33%	7.85%	£ 10,970,613	£ 1,009				
National	High Peak	02/2016	124 - 149	11500 - 12000	£ 7,128,193	£ 1,091,345	£ -	£ 1,967,043	£ -	£ -	£ 2,277,833	£ 909,524	£ 623,225		7.30%	5.00%	£ 11,476,391	£ 977				
Regional	Wyre	12/2017	124 - 149	13000 - 13500	£ 6,812,235	£ 1,275,550	£ 3,301,686	£ -	£ -	£ 517,319	£ 553,546	£ 121,191	£ 404,881		0.97%	3.25%	£ 12,413,256	£ 948				
Promoter	CWAC	10/2017	99 - 124	10500 - 11000	£ 9,355,300	£ -	£ -	£ 1,139,677	£ -	£ -	£ 144,907	£ 748,424	£ 280,659		7.03%	2.64%	£ 11,529,517	£ 1,052				
Promoter	Sefton	10/2017	124 - 149	12000 - 12500	£ 11,889,344	£ -	£ -	£ -	£ -	£ -	£ 3,846,912	£ 741,060	£ 594,467		4.71%	3.78%	£ 12,919,537	£ 1,042				
National	Sefton	02/2015	99 - 124	9000 - 9500	£ 7,948,248			£ 1,300,045		£ 277,710	£ 1,361,594	£ 407,348	£ 226,808		3.74%	2.08%	£ 10,088,277	£ 1,068				
National	St Helens	05/2016	124 - 149	10500 - 11000	£ 10,964,592	£ -	£ -	£ -	£ -	£ -	£ 1,420,274	£ 848,303	£ 652,541		6.85%	5.27%	£ 12,332,892	£ 1,136				
National	St Helens	01/2017	124 - 149	13000 - 13500	£ 11,159,448	£ -	£ 2,413,671	£ 11,159,448	£ 732,165	£ 372,869	£ 3,901,720	£ 732,165	£ 697,300		4.10%	3.91%	£ 15,085,307	£ 1,146				
Regional	Wyre	04/2014	99 - 124	9000 - 9500	£ 9,899,489	£ -	£ -	£ -	£ -	£ -	£ 2,456,742	£ 989,731	£ 618,582		8.01%	5.01%	£ 11,227,725	£ 1,218				
National	St Helens	05/2018	99 - 124	7500 - 8000	£ 8,108,972	£ -	£ -	£ -	£ -	£ -	£ 946,551	£ 636,166	£ 454,404		7.03%	5.02%	£ 9,114,133	£ 1,215				
National	CWAC	05/2016	124 - 149	11500 - 12000	£ 9,723,080	£ -	£ 1,684,770	£ 1,295,723	£ -	£ -	£ 1,193,241	£ 486,154	£ 486,154		3.50%	3.50%	£ 13,607,943	£ 1,158				
National	St Helens	04/2018	99 - 124	10000 - 10500	£ 10,768,088	£ -	£ -	£ 185,892	£ -	£ -	£ 2,579,092	£ 949,834	£ 678,452		7.02%	5.01%	£ 12,310,496	£ 1,224				
National	High Peak	10/2018	99 - 124	10500 - 11000	£ 12,044,421	£ -	£ -	£ -	£ -	£ -	£ 1,600,832	£ 918,515	£ 656,082		6.73%	4.81%	£ 13,473,273	£ 1,242				
National	West Lancs	09/2017	124 - 149	15000 - 15500	£ 16,824,302	£ -	£ 336,450	£ -	£ -	£ -	£ 4,715,494	£ 1,539,834	£ 1,099,881		7.04%	5.03%	£ 19,292,198	£ 1,253				
National	Rochdale	01/2014	99 - 124	9000 - 9500	£ 6,733,873	£ 1,575,733	£ 578,803	£ 373,847	£ 556,848	£ 495,864	£ 691,459	£ 519,773	£ 568,666		4.72%	5.17%	£ 11,360,196	£ 1,262				
Regional	Knowsley	08/2018	124 - 149	14500 - 15000	£ 17,563,419	£ -	£ -	£ -	£ -	£ -	£ 3,135,103	£ 1,448,897	£ 1,046,532		7.00%	5.06%	£ 19,743,039	£ 1,334				
National	Wirral	08/2016	99 - 124	8500 - 9000	£ 6,457,141	£ 1,727,804	£ 1,149,182	£ 754,1														

APPENDIX A

DATA BASE PROJECT ANALYSIS

					Totals														
Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies		Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals) per m2	
Schemes 225 - 499 dwellings																			
Landowner	St Helens	06/2015	374 - 399	26500 - 27000	£ 18,575,632	£ 2,056,284	£ -	£ 4,285,004	£ -	£ -	£ 6,120,175	£ 820,907	£ -		2.64%	0.00%	£ 25,575,954	£ 952	
National	CWAC	04/2016	399 - 424	32500 - 33000	£ 19,752,761	£ 3,950,593	£ 3,159,331	£ 3,952,433	£ -	£ 1,345,051	£ 4,218,043	£ 1,347,707	£ -		3.70%	0.00%	£ 33,351,609	£ 1,025	
Landowner	Cheshire East	03/2016	374 - 399	34500 - 35000	£ 35,388,698	£ -	£ -	£ -	£ -	£ -	£ 4,810,028	£ 2,831,096	£ 1,769,435		7.04%	4.40%	£ 39,548,452	£ 1,132	
National	West Lancs	02/2016	299 - 324	31000 - 31500	£ 27,925,088	£ -	£ 738,458	£ 3,475,262	£ 1,385,804	£ -	£ 8,745,300	£ 1,480,160	£ 1,117,004		3.50%	2.64%	£ 35,615,465	£ 1,148	
Local	Fylde	02/2018	249 - 274	27000 - 27500	£ 26,996,498	£ 1,258,438	£ 4,049,475	£ -	£ -	£ -	£ 2,118,491	£ 2,041,390	£ 973,637		5.93%	2.83%	£ 35,188,069	£ 1,299	
National	Staffordshire Moorlands	07/2018	299 - 324	24500 - 25000	£ 22,985,149	£ 1,916,129	£ 455,400	£ 3,706,736	£ -	£ 798,387	£ 2,148,087	£ 1,641,872	£ -		5.13%	0.00%	£ 31,393,492	£ 1,257	
Landowner	Preston	01/2017	449 - 474	42000 - 42500	£ 51,872,729	£ -	£ -	£ -	£ -	£ -	£ -	£ 2,593,636	£ 1,815,546		5.00%	3.50%	£ 56,372,688	£ 1,341	
																			7 no
															4.71%	1.91%	Average	£ 1,171	Median £1,148
Schemes >500 dwellings																			
National	Allerdale	06/2014	649 - 674	53000 - 53500	£ 42,519,818	£ -	£ -	£ 7,162,654	£ -	£ 2,408,620	£ 10,859,491	£ 2,320,247	£ -		3.69%	0.00%	£ 54,011,077	£ 1,015	
National	Alladale	07/2014	649 - 674	55000 - 55500	£ 46,766,078	£ -	£ 7,218,394	£ -	£ -	£ 2,427,364	£ 10,944,001	£ 2,338,304	£ -		3.47%	0.00%	£ 58,370,212	£ 1,054	
National	South Ribble	11/2018	949 - 974	89000 - 89500	£ 76,955,145	£ -	£ 15,542,062	£ -	£ -	£ 2,925,106	£ 16,942,072	£ 5,722,031	£ 3,412,180		5.09%	3.04%	£ 103,326,848	£ 1,157	
National	CWAC	02/2017	1299 - 1324	146500 - 147000	£ 129,585,088	£ -	£ 12,546,193	£ 18,009,004	£ -	£ 5,249,869	£ -	£ 9,509,934	£ 8,745,005		5.75%	5.29%	£ 184,147,931	£ 1,253	
National	St Helens	04/2013	899 - 924	87500 - 88000	£ 100,875,457	£ -	£ -	£ -	£ -	£ -	£ 6,462,256	£ 10,894,550	£ 8,070,037		10.15%	7.52%	£ 119,468,061	£ 1,359	
																			5 no
															5.63%	3.17%	Average	£ 1,200	Median £1,157

APPENDIX B

ST HELENS ONLY DATASET

APPENDIX B

DATA BASE PROJECT ANALYSIS - ST HELENS SCHEMES

Developer type	Location	Date (Month)	No Band	Overall area (m2 banded)	UPDATED COSTS											Fees%	Cont%	Overall total cost exc abnormals	Overall Total Cost (exc abnormals)	
					Subs/supers	Preliminaries	Externals in curt	Externals beyond curtilage	Drains	Inc servs	Abnormals	Fees	Contingencies							
Schemes 0 - 24 dwellings																				
Local	St Helens	10/2017	0 - 24	500 - 1000	£ 656,416	£ -	£ -	£ -	£ -	£ -	£ 25,600	£ 22,200	£ -		3.26%	0.00%	£ 677,783	£ 799		
Local	St Helens	02/2014	0 - 24	500 - 1000	£ 489,913	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		0.00%	0.00%	£ 489,913	£ 776		
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 659,838	£ -	£ -	£ -	£ -	£ -	£ 151,968	£ -	£ -		0.00%	0.00%	£ 659,838	£ 846		
Local	St Helens	09/2015	0 - 24	1500 - 2000	£ 1,218,613	£ 137,301	£ -	£ 94,459	£ -	£ -	£ 41,888	£ 205,094	£ 84,867		13.74%	5.69%	£ 1,743,531	£ 1,057		
Landowner	St Helens	12/2017	0 - 24	1000 - 1500	£ 1,022,142	£ -	£ -	£ -	£ 255,536	£ -	£ 19,321	£ 127,768	£ 42,743		9.85%	3.30%	£ 1,449,796	£ 1,030		
Local	St Helens	06/2016	0 - 24	500 - 1000	£ 619,640	£ 6,660	£ -	£ -	£ -	£ -	£ 19,979	£ -	£ 24,973		3.86%	0.00%	£ 671,252	£ 978		
Local	St Helens	04/2016	0 - 24	0 - 500	£ 446,236	£ -	£ -	£ -	£ 6,105	£ -	£ 53,277	£ 27,310	£ 8,925		5.40%	1.77%	£ 485,188	£ 1,055		
Regional	St Helens	04/2017	0 - 24	2000 - 2500	£ 2,510,084	£ -	£ -	£ -	£ -	£ -	£ 453,733	£ 177,190	£ 72,029		5.98%	2.43%	£ 2,724,797	£ 1,153		
Local	St Helens	10/2016	0 - 24	500 - 1000	£ 940,106	£ -	£ 121,661	£ -	£ -	£ 44,240	£ 50,876	£ 91,411	£ 54,847		7.90%	4.74%	£ 1,249,977	£ 1,255		
Local	St Helens	01/2017	0 - 24	1500 - 2000	£ 1,125,567	£ 322,663	£ 199,341	£ -	£ -	£ 70,898	£ -	£ 85,919	£ 88,550		5.00%	5.15%	£ 1,897,364	£ 1,226		
Regional	St Helens	11/2013	0 - 24	500 - 1000	£ 908,551	£ -	£ 91,674	£ -	£ -	£ -	£ 292,701	£ 93,474	£ 45,427		7.23%	3.51%	£ 1,110,222	£ 1,240		
Landowner	St Helens	07/2016	0 - 24	1000 - 1500	£ 1,422,272	£ -	£ -	£ 218,675	£ -	£ -	£ -	£ 113,782	£ 35,557		6.93%	2.17%	£ 1,792,751	£ 1,231		
Local	St helens	07/2016	0 - 24	1000 - 1500	£ 1,435,948	£ -	£ -	£ 220,777	£ -	£ -	£ 44,141	£ 114,876	£ 35,899		6.75%	2.11%	£ 1,805,948	£ 1,229		
Landowner	St helens	04/2016	0 - 24	500 - 1000	£ 858,118	£ 41,622	£ 81,580	£ -	£ -	£ -	£ 131,527	£ 76,813	£ 24,576		6.90%	2.21%	£ 1,072,222	£ 1,339		
Local	St Helens	06/2013	0 - 24	500 - 1000	£ 725,903	£ 15,915	£ 3,316	£ -	£ -	£ 15,915	£ -	£ 22,547	£ -		2.96%	0.00%	£ 783,596	£ 1,276		
Local	St Helens	11/2013	0 - 24	0 - 500	£ 513,320	£ -	£ -	£ -	£ -	£ -	£ 10,477	£ -	£ -		0.00%	0.00%	£ 513,320	£ 1,252		
Local	St Helens	10/2016	0 - 24	1000 - 1500	£ 1,953,485	£ -	£ -	£ -	£ -	£ -	£ 196,869	£ 160,967	£ 58,605		7.49%	2.73%	£ 2,156,940	£ 1,526		
Landowner	St Helens	09/2016	0 - 24	1500 - 2000	£ 2,069,469	£ -	£ 212,121	£ -	£ -	£ -	£ 57,326	£ 165,099	£ 51,737		7.06%	2.21%	£ 2,496,674	£ 1,529		
Local	St Helens	07/2014	0 - 24	500 - 1000	£ 842,520	£ -	£ -	£ -	£ 53,315	£ -	£ 65,883	£ 98,650	£ -		10.26%	0.00%	£ 987,727	£ 1,598		
Local	St Helens	12/2012	0 - 24	500 - 1000	£ 566,151	£ 201,082	£ 16,312	£ -	£ -	£ 48,417	£ -	£ -	£ -		0.00%	0.00%	£ 831,962	£ 1,454		
Local	St Helens	05/2014	0 - 24	500 - 1000	£ 1,007,060	£ 277,966	£ 88,551	£ 83,225	£ 75,480	£ 60,663	£ 190,473	£ 113,801	£ 80,087		6.38%	4.49%	£ 1,770,690	£ 1,814		
Landowner	St Helens	10/2011	0 - 24	500 - 1000	£ 928,557	£ -	£ -	£ -	£ -	£ 49,126	£ 14,036	£ 50,880	£ -		5.13%	0.00%	£ 1,027,843	£ 1,742		
Local	St Helens	03/2013	0 - 24	500 - 1000	£ 925,758	£ 80,256	£ 47,753	£ 88,951	£ 61,530	£ 58,855	£ 11,905	£ 71,549	£ -		5.61%	0.00%	£ 1,333,983	£ 1,767		
																			23 no	
															5.55%	1.85%	Average	£ 1,261	Median £1,240	
Schemes 25 - 49 dwellings																				
Local	St Helens	07/2012	24 - 49	1500 - 2000	£ 2,091,065	£ 147,377	£ -	£ 231,592	£ -	£ -	£ 666,704	£ 147,377	£ 126,323		4.70%	4.03%		£ 1,516		
																			1 no	
															4.70%	4.03%	Average	£ 1,516	Median £1,516	
Schemes 50 - 74 dwellings																				
National	St Helens	05/2017	49 - 74	3500 - 4000	£ 2,759,182	£ -	£ -	£ 41,338	£ 262,166	£ 127,035	£ 137,507	£ 165,551	£ 137,960		4.98%	4.15%	£ 3,487,270	£ 986		
National	St Helens	04/2016	49 - 74	4000 - 4500	£ 3,478,393	£ -	£ 414,448	£ -	£ 231,975	£ -	£ 534,586	£ 208,703	£ 173,919		4.48%	3.73%	£ 4,470,436	£ 1,113		
National	St Helens	11/2014	49 - 74	3500 - 4000	£ 3,460,724	£ -	£ -	£ 209,776	£ 112,632	£ 158,917	£ 614,495	£ 218,026	£ 173,036		4.78%	3.80%	£ 4,287,535	£ 1,128		
Regional	St Helens	12/2013	49 - 74	5000 - 5500	£ 5,294,512	£ -	£ -	£ -	£ -	£ -	£ 602,623	£ 367,856	£ -		6.24%	0.00%	£ 5,624,777	£ 1,112		
Local	St Helens	04/2018	49 - 74	5000 - 5500	£ 5,658,120	£ -	£ -	£ -	£ -	£ -	£ 859,759	£ 456,252	£ 325,894		7.00%	5.00%	£ 6,356,898	£ 1,217		
																			5 no	
															5.50%	3.34%	Average	£ 1,120	Median £1,113	
Schemes 75 - 99 dwellings																				
Regional	St helens	05/2017	74 - 99	7500 - 8000	£ 4,933,060	£ 533,549	£ 157,778	£ 490,586	£ 5,313	£ -	£ 2,251,775	£ 394,645	£ 246,566		4.71%	2.95%	£ 6,597,531	£ 855		
National	St Helens	12/2017	74 - 99	6500 - 7000	£ 3,159,998	£ 823,826	£ 889,043	£ -	£ 402,024	£ 202,870	£ 752,023	£ 261,477	£ -		4.20%	0.00%	£ 5,707,674	£ 846		
Promoter	St Helens	08/2017	74 - 99	6500 - 7000	£ 6,176,745	£ -	£ -	£ 308,837	£ 106,265	£ -	£ 620,832	£ 518,847	£ 216,381		7.19%	3.00%	£ 7,278,016	£ 1,090		
National	St Helens	04/2015	74 - 99	6500 - 7000	£ 6,663,527	£ -	£ -	£ -	£ -	£ -	£ 750,071	£ 481,884	£ 222,408		6.50%	3.00%	£ 7,309,556	£ 1,104		
National	St Helens	04/2014	74 - 99	6500 - 7000	£ 7,446,906	£ -	£ -	£ -	£ -	£ -	£ 860,661	£ 671,345	£ 419,590		8.08%	5.05%	£ 8,455,216	£ 1,212		
National	St Helens	11/2013	74 - 99	6500 - 7000	£ 6,529,066	£ -	£ 859,113	£ -	£ -	£ -	£ 2,247,969	£ 391,863	£ 368,189		4.07%	3.82%	£ 7,982,402	£ 1,155		
Landowner	St Helens	10/2016	74 - 99	7000 - 7500	£ 5,958,298	£ 1,011,448	£ 435,833	£ -	£ 906,074	£ -	£ 516,118	£ 476,664	£ 297,915		5.					

APPENDIX C

GENERIC CONSTRUCTION COSTS

APPENDIX C

GENERIC COST BREAKDOWNS

5 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2	£ 690.57/m2
Prelims		£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2	£ 173.31/m2
Ext works		£ 234.87/m2	£ 234.87/m2	£ 225.04/m2	£ 225.04/m2	£ 217.39/m2	£ 217.39/m2	£ 234.87/m2	£ 225.04/m2	£ 217.39/m2	£ 234.87/m2	£ 225.04/m2
POS		£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Abnormals		£ 0.00/m2	£ 66.28/m2	£ 0.00/m2	£ 63.87/m2	£ 0.00/m2	£ 62.06/m2	£ 66.28/m2	£ 63.87/m2	£ 62.06/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 82.41/m2	£ 87.38/m2	£ 81.67/m2	£ 86.46/m2	£ 81.10/m2	£ 85.75/m2	£ 87.38/m2	£ 86.46/m2	£ 85.75/m2	£ 82.41/m2	£ 81.67/m2
Conts	5.00%	£ 59.06/m2	£ 62.62/m2	£ 58.53/m2	£ 61.96/m2	£ 58.12/m2	£ 61.45/m2	£ 62.62/m2	£ 61.96/m2	£ 61.45/m2	£ 59.06/m2	£ 58.53/m2
Scale		£ 86.82/m2	£ 92.05/m2	£ 86.04/m2	£ 91.09/m2	£ 85.43/m2	£ 90.34/m2	£ 92.05/m2	£ 91.09/m2	£ 90.34/m2	£ 86.82/m2	£ 86.04/m2
Total/m2		£ 1,327/m2	£ 1,407/m2	£ 1,315/m2	£ 1,392/m2	£ 1,306/m2	£ 1,381/m2	£ 1,407/m2	£ 1,392/m2	£ 1,381/m2	£ 1,327/m2	£ 1,315/m2

10 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 694.77/m2	£ 704.52/m2	£ 704.52/m2	£ 704.52/m2	£ 708.42/m2	£ 708.42/m2
Prelims		£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 128.91/m2	£ 135.05/m2	£ 135.05/m2	£ 135.05/m2	£ 139.48/m2	£ 139.48/m2
Ext works		£ 255.32/m2	£ 255.32/m2	£ 244.89/m2	£ 244.89/m2	£ 236.76/m2	£ 236.76/m2	£ 253.30/m2	£ 242.37/m2	£ 233.86/m2	£ 259.50/m2	£ 248.23/m2
POS		£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.11/m2	£ 10.59/m2	£ 10.59/m2	£ 10.59/m2	£ 10.94/m2	£ 10.94/m2
Abnormals		£ 0.00/m2	£ 67.31/m2	£ 0.00/m2	£ 64.75/m2	£ 0.00/m2	£ 62.83/m2	£ 68.16/m2	£ 65.48/m2	£ 63.47/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 81.68/m2	£ 86.73/m2	£ 80.90/m2	£ 85.76/m2	£ 80.29/m2	£ 85.00/m2	£ 87.87/m2	£ 86.85/m2	£ 86.06/m2	£ 83.88/m2	£ 83.03/m2
Conts	5.00%	£ 58.54/m2	£ 62.16/m2	£ 57.98/m2	£ 61.46/m2	£ 57.54/m2	£ 60.92/m2	£ 62.97/m2	£ 62.24/m2	£ 61.68/m2	£ 60.11/m2	£ 59.50/m2
Scale		£ 61.47/m2	£ 65.27/m2	£ 60.88/m2	£ 64.53/m2	£ 60.42/m2	£ 63.97/m2	£ 66.12/m2	£ 65.36/m2	£ 64.76/m2	£ 63.12/m2	£ 62.48/m2
Total/m2		£ 1,291/m2	£ 1,371/m2	£ 1,278/m2	£ 1,355/m2	£ 1,269/m2	£ 1,343/m2	£ 1,389/m2	£ 1,372/m2	£ 1,360/m2	£ 1,325/m2	£ 1,312/m2

APPENDIX C

GENERIC COST BREAKDOWNS

25 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 702.65/m2	£ 702.65/m2	£ 702.62/m2	£ 702.64/m2	£ 702.65/m2	£ 702.65/m2	£ 701.38/m2	£ 701.38/m2	£ 701.38/m2	£ 703.55/m2	£ 703.55/m2
Prelims		£ 107.07/m2	£ 107.05/m2	£ 107.07/m2	£ 107.22/m2	£ 107.22/m2	£ 107.22/m2	£ 107.92/m2	£ 107.92/m2	£ 107.92/m2	£ 110.95/m2	£ 110.95/m2
Ext works		£ 264.49/m2	£ 264.49/m2	£ 253.45/m2	£ 253.45/m2	£ 244.85/m2	£ 244.85/m2	£ 261.79/m2	£ 250.68/m2	£ 242.03/m2	£ 269.38/m2	£ 257.96/m2
POS		£ 17.78/m2	£ 17.78/m2	£ 16.77/m2	£ 16.77/m2	£ 16.01/m2	£ 16.01/m2	£ 17.89/m2	£ 16.87/m2	£ 16.11/m2	£ 18.40/m2	£ 17.35/m2
Abnormals		£ 0.00/m2	£ 70.52/m2	£ 0.00/m2	£ 67.51/m2	£ 0.00/m2	£ 65.26/m2	£ 70.58/m2	£ 67.55/m2	£ 65.28/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.50%	£ 81.90/m2	£ 87.19/m2	£ 80.99/m2	£ 86.07/m2	£ 80.30/m2	£ 85.20/m2	£ 86.97/m2	£ 85.83/m2	£ 84.95/m2	£ 82.67/m2	£ 81.74/m2
Conts	5.00%	£ 58.69/m2	£ 62.48/m2	£ 58.05/m2	£ 61.68/m2	£ 57.55/m2	£ 61.06/m2	£ 62.33/m2	£ 61.51/m2	£ 60.88/m2	£ 59.25/m2	£ 58.58/m2
Scale		£ 25.88/m2	£ 27.82/m2	£ 25.60/m2	£ 27.20/m2	£ 25.11/m2	£ 26.86/m2	£ 32.72/m2	£ 32.29/m2	£ 31.96/m2	£ 31.10/m2	£ 30.75/m2
Total/m2		£ 1,258/m2	£ 1,340/m2	£ 1,245/m2	£ 1,323/m2	£ 1,234/m2	£ 1,309/m2	£ 1,342/m2	£ 1,324/m2	£ 1,311/m2	£ 1,275/m2	£ 1,261/m2

50 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 699.01/m2	£ 697.78/m2	£ 698.60/m2	£ 697.90/m2	£ 698.69/m2	£ 698.00/m2	£ 704.20/m2	£ 704.16/m2	£ 704.16/m2	£ 705.02/m2	£ 705.02/m2
Prelims		£ 105.30/m2	£ 105.23/m2	£ 105.23/m2	£ 105.23/m2	£ 105.23/m2	£ 104.69/m2	£ 95.26/m2	£ 95.26/m2	£ 95.26/m2	£ 97.16/m2	£ 97.16/m2
Ext works		£ 267.51/m2	£ 267.32/m2	£ 256.16/m2	£ 256.16/m2	£ 247.47/m2	£ 247.47/m2	£ 266.81/m2	£ 255.54/m2	£ 246.77/m2	£ 270.14/m2	£ 258.66/m2
POS		£ 15.33/m2	£ 25.13/m2	£ 23.08/m2	£ 23.08/m2	£ 21.55/m2	£ 21.55/m2	£ 12.68/m2	£ 11.64/m2	£ 10.87/m2	£ 12.93/m2	£ 11.88/m2
Abnormals		£ 0.00/m2	£ 73.40/m2	£ 0.00/m2	£ 70.06/m2	£ 0.00/m2	£ 67.55/m2	£ 70.86/m2	£ 67.79/m2	£ 65.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	7.00%	£ 76.92/m2	£ 70.87/m2	£ 65.68/m2	£ 69.88/m2	£ 65.06/m2	£ 69.08/m2	£ 68.99/m2	£ 68.06/m2	£ 67.35/m2	£ 65.11/m2	£ 64.36/m2
Conts	5.00%	£ 58.79/m2	£ 62.60/m2	£ 58.01/m2	£ 61.73/m2	£ 57.47/m2	£ 61.02/m2	£ 60.94/m2	£ 60.12/m2	£ 59.50/m2	£ 57.52/m2	£ 56.85/m2
Scale		£ 18.54/m2	£ 19.72/m2	£ 19.80/m2	£ 20.57/m2	£ 20.22/m2	£ 21.79/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Total/m2		£ 1,241/m2	£ 1,322/m2	£ 1,227/m2	£ 1,305/m2	£ 1,216/m2	£ 1,291/m2	£ 1,280/m2	£ 1,263/m2	£ 1,249/m2	£ 1,208/m2	£ 1,194/m2

APPENDIX C

GENERIC COST BREAKDOWNS

75 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 703.06/m2	£ 703.06/m2	£ 703.06/m2	£ 703.92/m2	£ 703.92/m2
Prelims		£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 94.28/m2	£ 96.29/m2	£ 96.29/m2	£ 96.29/m2	£ 98.04/m2	£ 98.04/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 265.69/m2	£ 254.44/m2	£ 245.67/m2	£ 269.79/m2	£ 258.37/m2
POS		£ 24.78/m2	£ 24.78/m2	£ 21.74/m2	£ 21.74/m2	£ 8.86/m2	£ 8.86/m2	£ 25.30/m2	£ 22.21/m2	£ 9.05/m2	£ 25.68/m2	£ 22.54/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 65.16/m2	£ 75.15/m2	£ 71.47/m2	£ 65.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	6.00%	£ 65.08/m2	£ 69.56/m2	£ 64.24/m2	£ 68.50/m2	£ 62.95/m2	£ 66.86/m2	£ 69.93/m2	£ 68.85/m2	£ 67.17/m2	£ 65.85/m2	£ 64.97/m2
Conts	5.00%	£ 57.49/m2	£ 61.44/m2	£ 56.74/m2	£ 60.51/m2	£ 55.61/m2	£ 59.06/m2	£ 61.77/m2	£ 60.82/m2	£ 59.34/m2	£ 58.16/m2	£ 57.39/m2
Scale		£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2	£ 0.00/m2
Total/m2		£ 1,207/m2	£ 1,290/m2	£ 1,192/m2	£ 1,271/m2	£ 1,168/m2	£ 1,240/m2	£ 1,297/m2	£ 1,277/m2	£ 1,246/m2	£ 1,221/m2	£ 1,205/m2

100 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 702.26/m2	£ 702.26/m2	£ 702.26/m2	£ 703.71/m2	£ 703.71/m2
Prelims		£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 98.99/m2	£ 99.95/m2	£ 99.95/m2	£ 99.95/m2	£ 102.60/m2	£ 102.60/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 264.96/m2	£ 253.83/m2	£ 245.16/m2	£ 269.25/m2	£ 257.83/m2
POS		£ 27.62/m2	£ 27.62/m2	£ 24.59/m2	£ 24.59/m2	£ 22.32/m2	£ 22.32/m2	£ 27.89/m2	£ 24.83/m2	£ 22.53/m2	£ 28.63/m2	£ 25.49/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 68.31/m2	£ 74.85/m2	£ 71.22/m2	£ 68.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	5.00%	£ 54.61/m2	£ 58.34/m2	£ 53.91/m2	£ 57.46/m2	£ 53.37/m2	£ 56.78/m2	£ 58.50/m2	£ 57.60/m2	£ 56.92/m2	£ 55.21/m2	£ 54.48/m2
Conts	5.00%	£ 57.34/m2	£ 61.26/m2	£ 56.60/m2	£ 60.33/m2	£ 56.03/m2	£ 59.62/m2	£ 61.42/m2	£ 60.48/m2	£ 59.77/m2	£ 57.97/m2	£ 57.21/m2
Scale		-£ 18.06/m2	-£ 19.30/m2	-£ 17.83/m2	-£ 19.00/m2	-£ 17.65/m2	-£ 18.78/m2	-£ 19.35/m2	-£ 19.05/m2	-£ 18.83/m2	-£ 18.26/m2	-£ 18.02/m2
Total/m2		£ 1,186/m2	£ 1,267/m2	£ 1,171/m2	£ 1,248/m2	£ 1,159/m2	£ 1,233/m2	£ 1,270/m2	£ 1,251/m2	£ 1,236/m2	£ 1,199/m2	£ 1,183/m2

APPENDIX C

GENERIC COST BREAKDOWNS

200 Dwellings

		0% Affordable						10% Affordable			30% Affordable	
		30 dph GF	30 dph BF	35 dph GF	35 dph BF	40 dph GF	40 dph BF	30 dph BF	35 dph BF	40 dph BF	30 dph GF	35 dph GF
Houses		£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 701.55/m2	£ 702.26/m2	£ 702.26/m2	£ 702.26/m2	£ 703.66/m2	£ 703.66/m2
Prelims		£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 66.55/m2	£ 67.20/m2	£ 67.20/m2	£ 67.20/m2	£ 68.87/m2	£ 68.87/m2
Ext works		£ 264.08/m2	£ 264.08/m2	£ 253.06/m2	£ 253.06/m2	£ 244.47/m2	£ 244.47/m2	£ 265.07/m2	£ 253.95/m2	£ 245.28/m2	£ 269.29/m2	£ 257.89/m2
POS		£ 27.62/m2	£ 27.62/m2	£ 24.59/m2	£ 24.59/m2	£ 22.32/m2	£ 22.32/m2	£ 27.89/m2	£ 24.83/m2	£ 22.53/m2	£ 28.58/m2	£ 25.45/m2
Abnormals		£ 0.00/m2	£ 74.61/m2	£ 0.00/m2	£ 71.01/m2	£ 0.00/m2	£ 68.31/m2	£ 74.85/m2	£ 71.22/m2	£ 68.49/m2	£ 0.00/m2	£ 0.00/m2
Fees	5.00%	£ 52.99/m2	£ 56.72/m2	£ 52.29/m2	£ 55.84/m2	£ 51.74/m2	£ 55.16/m2	£ 56.86/m2	£ 55.97/m2	£ 55.29/m2	£ 53.52/m2	£ 52.79/m2
Conts	5.00%	£ 55.64/m2	£ 59.56/m2	£ 54.90/m2	£ 58.63/m2	£ 54.33/m2	£ 57.92/m2	£ 59.71/m2	£ 58.77/m2	£ 58.05/m2	£ 56.20/m2	£ 55.43/m2
Scale		-£ 17.53/m2	-£ 18.76/m2	-£ 17.29/m2	-£ 18.47/m2	-£ 17.11/m2	-£ 18.24/m2	-£ 18.81/m2	-£ 18.51/m2	-£ 18.29/m2	-£ 17.70/m2	-£ 17.46/m2
Total/m2		£ 1,151/m2	£ 1,232/m2	£ 1,136/m2	£ 1,213/m2	£ 1,124/m2	£ 1,198/m2	£ 1,235/m2	£ 1,216/m2	£ 1,201/m2	£ 1,162/m2	£ 1,147/m2

APPENDIX D

SCALE FACTORS

Tender price studies

Contract sum

➤ Rebased to 4Q 2018 (331; sample 81) and St Helens (98; sample 31)

The series contained on the page are as published on 12-Nov-2018

Background

The Contract Sum study is based on a least squares linear regression with the natural logarithm of the adjusted project index as the dependant variable and the logarithm (base 10) of the contract sum (adjusted to 1985 prices) as the independent variable. The parameters obtained can be transformed into a formula which calculates a factor directly from a contract sum or you can look up a factor using the table below.

A Contract Sum factor can be calculated as follows:

- Calculate Contract Sum at 1985 prices.
- Raise this figure to the power -0.03682.
- Multiply by 1.63331.

Notes:

- Mean contract value = £1,983,000
- The study was based on projects in the range £162,000 to £49,000,000 and is not applicable to smaller or larger projects

Base: Mean contract value = 100

Updated: 09-Nov-2018

Contract value	Index	90% confidence interval	90% prediction interval
£150,000	110	109 - 111	93 - 131
£190,000	109	109 - 109	92 - 129
£250,000	108	108 - 108	91 - 128
£320,000	107	107 - 107	90 - 127
£410,000	106	106 - 106	89 - 126
£530,000	105	105 - 105	88 - 125
£680,000	104	104 - 104	88 - 123
£890,000	103	103 - 103	87 - 122
£1,200,000	102	102 - 102	86 - 121
£1,500,000	101	101 - 101	85 - 120
£2,000,000	100	100 - 100	84 - 119
£2,600,000	99	99 - 99	83 - 117
£3,400,000	98	98 - 98	83 - 116
£4,500,000	97	97 - 97	82 - 115
£6,000,000	96	96 - 96	81 - 114
£8,000,000	95	95 - 95	80 - 113
£11,000,000	94	94 - 94	79 - 112
£14,000,000	93	93 - 93	78 - 110
£19,000,000	92	92 - 92	78 - 109
£26,000,000	91	91 - 91	77 - 108
£35,000,000	90	90 - 90	76 - 107
£47,000,000	89	88 - 90	75 - 106

APPENDIX E

GENERIC CONSTRUCTION COST COMPARISON TO DATABASE

APPENDIX E

GENERIC COST BREAKDOWNS

5 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,327/m2	£ 1,315/m2	£ 1,306/m2	£ 1,327/m2	£ 1,315/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,310/m2	£ 1,309/m2	£ 776/m2	£ 2,089/m2
St Helens Only	£ 1,261/m2	£ 1,240/m2	£ 776/m2	£ 1,814/m2

10 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,291/m2	£ 1,278/m2	£ 1,269/m2	£ 1,325/m2	£ 1,312/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,310/m2	£ 1,309/m2	£ 776/m2	£ 2,089/m2
St Helens Only	£ 1,261/m2	£ 1,240/m2	£ 776/m2	£ 1,814/m2

25 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,258/m2	£ 1,245/m2	£ 1,234/m2	£ 1,275/m2	£ 1,261/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,285/m2	£ 1,240/m2	£ 976/m2	£ 1,723/m2
St Helens Only*	£ 1,516/m2	£ 1,516/m2	£ 1,516/m2	£ 1,516/m2

50 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,241/m2	£ 1,227/m2	£ 1,216/m2	£ 1,208/m2	£ 1,194/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,147/m2	£ 1,121/m2	£ 859/m2	£ 1,436/m2
St Helens Only	£ 1,120/m2	£ 1,113/m2	£ 986/m2	£ 1,217/m2

75 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,207/m2	£ 1,192/m2	£ 1,168/m2	£ 1,221/m2	£ 1,205/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,189/m2	£ 1,212/m2	£ 846/m2	£ 1,408/m2
St Helens Only	£ 1,070/m2	£ 1,104/m2	£ 846/m2	£ 1,240/m2

100 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,186/m2	£ 1,171/m2	£ 1,159/m2	£ 1,199/m2	£ 1,183/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,162/m2	£ 1,186/m2	£ 713/m2	£ 1,457/m2
St Helens Only	£ 1,228/m2	£ 1,215/m2	£ 1,136/m2	£ 1,439/m2

200 Dwellings

Total/m2	0% Affordable			30% Affordable	
	30 dph GF	35 dph GF	40 dph GF	30 dph GF	35 dph GF
	£ 1,151/m2	£ 1,136/m2	£ 1,124/m2	£ 1,162/m2	£ 1,147/m2

Data Base	Average	Median	Min	Max
Overall	£ 1,199/m2	£ 1,211/m2	£ 1,014/m2	£ 1,363/m2
St Helens Only	£ 1,193/m2	£ 1,235/m2	£ 1,014/m2	£ 1,333/m2

* Only one scheme in this category in St Helens

APPENDIX F

ALLOCATIONS CONSTRUCTION COST COMPARISON TO DATABASE

APPENDIX F

Allocations Analysis

Allocation	7HA	1HA
No Dwellings	181	216
Floor Area (sq.m)	15106	18046
Base, ext works, prelims	£16,817,366	£20,044,600
Abnormals	£400,600	£80,000
Fees	£1,291,347	£1,509,345
Contingency	£925,466	£1,081,697
Fee % Total base +abnormals	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%
Base, ext, prelims	£16,817,366	£20,044,600
Fees	£1,261,302	£1,503,345
Contingency	£903,934	£1,077,397
Total ex abnormals	£18,982,602	£22,625,342
Rate (per sq.m) ex abnormals	£1,257	£1,254

Allocation	8HA	9HA
No Dwellings	259	350
Floor Area (sq.m)	21614	30518
Base, ext works, prelims	£24,395,314	£32,663,601
Abnormals	£735,600	£3,173,000
Fees	£1,884,819	£2,687,723
Contingency	£1,350,787	£1,926,201
Fee % Total base +abnormals	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%
Base, ext, prelims	£24,395,314	£32,663,601
Fees	£1,829,649	£2,449,750
Contingency	£1,311,248	£1,755,654
Total ex abnormals	£27,536,211	£36,869,005
Rate (per sq.m) ex abnormals	£1,274	£1,208

Allocation	2HA	5HA	10HA	6HA	4HA
No Dwellings	522	569	802	816	2988
Floor Area (sq.m)	43548	47478	69844	71070	249401
Base, ext works, prelims	£47,591,164	£51,185,797	£75,772,603	£78,025,571	£264,961,986
Abnormals	£815,300	£1,899,000	£6,057,000	£5,617,000	£2,560,000
Fees	£3,630,485	£3,981,360	£6,137,220	£6,273,193	£20,064,149
Contingency	£2,601,847	£2,853,308	£4,398,341	£4,495,788	£14,379,307
Fee % Total base +abnormals	7.50%	7.50%	7.50%	7.50%	7.50%
Contingency % total base + abnormals + fees	5.00%	5.00%	5.00%	5.00%	5.00%
Base, ext, prelims	£47,591,164	£51,185,797	£75,772,603	£78,025,571	£264,961,986
Fees	£3,569,337	£3,838,935	£5,682,945	£5,851,918	£19,872,149
Contingency	£2,558,025	£2,751,237	£4,072,777	£4,193,874	£14,241,707
Total ex abnormals	£53,718,526	£57,775,969	£85,528,325	£88,071,363	£299,075,842
Rate (per sq.m) ex abnormals	£1,234	£1,217	£1,225	£1,239	£1,199

150-225 dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,199/m2	£ 1,211/m2	£ 1,014/m2	£ 1,363/m2
St Helens Only	£ 1,193/m2	£ 1,235/m2	£ 1,014/m2	£ 1,333/m2

226-500 Dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,171/m2	£ 1,148/m2	£ 952/m2	£ 1,341/m2
St Helens Only*	£ 952/m2	£ 952/m2	£ 952/m2	£ 952/m2

Over 500 dwellings

Data Base	Average	Median	Min	Max
Overall	£ 1,200/m2	£ 1,157/m2	£ 1,015/m2	£ 1,359/m2
St Helens Only*	£ 1,359/m2	£ 1,359/m2	£ 1,359/m2	£ 1,359/m2

* Only one scheme in this category in St Helens

APPENDIX 23: CONTINUED ENGAGEMENT WITH NATURAL ENGLAND AND HIGHWAYS ENGLAND

Continued engagement with Natural England after Local Plan Submission Draft stage (2019)

Email from Natural England to St Helens Council – 14/08/2019

Dear Lyndsey,

Please see our comments below regarding recommended changes to the St Helens Local Plan 2020-2035 (Submission Draft).

In regard to your request to review the draft Nature Conservation SPD, before the formal public consultation expected in early autumn 2019, this would fall under our Discretionary Advise Service (DAS), a paid service to provide early advice ahead of any formal planning consultation. For further information on DAS please refer to the following webpage - <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>.

Air Pollution

Natural England advises that the wording under point three in LPD09 Air Quality Policy needs to be amended in order to be compliant with the Wealden ruling (Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351) in terms of in-combination effects relating to air pollution. We would propose the following amendment;

*“3. New development that would result in increased traffic flows on the M62 past Manchester Mosses Special Area of Conservation (SAC) **alone or in-combination** of more than 1000 vehicles per day or 200 Heavy Goods Vehicles (HGVs) per day must be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on ecological interests within the SAC. Where such effects are identified they would need to be considered in accordance with Policy LPC06.”*

Subject to the above amendment Natural England is satisfied with the level of protection for designated sites. However as the consideration of air pollution is being deferred to project level HRA there is a risk to the deliverability of allocations if development cannot proceed as a result of lack of mitigation available at the planning application stage. This risk to deliverability lies with the Local Authority to ensure that the proposed level of development can be accommodated without adversely affecting the designated sites. Further detail on this point would provide confidence that the level of development proposed can be accommodated.

We recognise that air pollution is difficult to assess and mitigate at plan level but would advise that the Local Authority commit to investigating strategic solutions to address air pollution with neighbouring authorities to address the issue effectively and efficiently. Commitment to this in the Local Plan would be welcomed to ensure an evidence base can be built and a consistent approach developed in accordance with neighbouring authorities.

Functionally Linked Land

Natural England advise that more clarity is needed on available mitigation land. It is not clear if the “significant amount of available agricultural land” referred to, that could provide feeding area for passage and overwintering birds, is within ownership of the Local Authority, i.e. can this land be secured and relied upon to deliver mitigation over the lifetime of the plan. If land is not in LPA ownership further detail is required to outline how land will be secured and how mitigation will be delivered. We also recommend that confirmation is required that land within the Nature Improvement Areas is available and suitable for SPA mitigation land. If more detailed information on mitigation will be contained in the Nature Conservation SPD this should be clearly referenced in both the Local Plan and the HRA.

Recreational pressure

In light of available evidence, a clear commitment to the development and adoption of the Liverpool City Region Recreational Mitigation Strategy and the approach to Bold Forest Park as set out in the comments received from St Helens (dated 25th July 2019) Natural England is satisfied that the HRA can conclude no adverse impacts upon the integrity of the European designated sites arising from recreational pressure. We recommend the inclusion of the approach set out in the communications dated 25th July 2019 to be incorporated into the supporting text of Policy LPC06 Biodiversity and Geological Conservation as proposed.

For any queries relating to the comments within this email please contact me using the details below. For any new consultations please send your correspondences to consultations@naturalengland.org.uk.

Kind regards,

Aurelie

Aur lie Bohan
Strategic Coastal Lead Adviser
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team
Natural England
2nd Floor
Arndale House
The Arndale Centre
Manchester
M4 3AQ

www.gov.uk/natural-england

Email from St Helens Council to Natural England - 25/07/2019

From: Lyndsey Darwin

Sent: 25 July 2019 16:33

To: Ayliffe, Stephen

Cc: Riley, James D (Basingstoke) Jonathan Clarke Sara Jones; Bohan, Aurelie

Subject: St Helens Borough Local Plan 2020-2035 (Submission Draft) - Natural England response

Dear Stephen,

I am writing in relation to Natural England's response to the St. Helens Local Plan 2020-2035 Submission Draft consultation dated 13 March 2019.

Firstly, I would like to apologise for the delay in responding. However, we would now like to work quickly to clarify the way forward in addressing your comments about the St Helens Borough Local Plan.

I can confirm that we now aim to submit the Plan to the Secretary of State in early autumn 2019. The independent examination will start at that point.

With this in mind, I set out (in the table attached to this e-mail) our comments on the matters set out in your letter. We have liaised with our consultants AECOM and with MEAS in preparing these comments. Our response identifies where we may recommend changes to parts of the Plan to address the matters raised in your letter and our proposed interim approach in relation to the Liverpool City Region Recreation Mitigation Strategy. Whilst we do not currently envisage formally changing the Plan before it is submitted, we may be happy (subject to necessary approval within the Council) to put changes forward for the Inspector to consider as part of the examination process.

Also attached is our draft Nature Conservation SPD which we intend to publish in draft when we submit the Plan for examination. We would welcome any comments you have on the SPD.

We wish to continue the positive engagement and co-operation that has taken place with Natural England throughout the Local Plan preparation process. As a first stage, I would be pleased if you would provide your views on the points we set out in the attached table (by **09/08/2019** if possible) and then any comments on the SPD could follow but no later than **23/08/2019** if possible.

Please do not hesitate to contact me if you require any further details.

Regards

Lyndsey

(See attached file: STH Comments on Natural England Letter_July 2017.pdf)(See attached file: Nature Conservation SPD.V2 for NE.pdf)

Lyndsey Darwin

Principal Planning Officer (Policy)

St. Helens Council

Development Plans, Development & Growth,

Place Services,

Town Hall Annexe, Victoria Square,

St Helens, Merseyside, WA10 1HP

Comments on Natural England letter dated 13 March 2019

Issue	Summary of Natural England Comment	Comments of StHBC officers (25/07/19)
Air Pollution	We... are content that allocations should consider this [air quality] at a project level HRA, but we would like to be assured that mitigation exists and is deliverable in line with project level HRAs over the timeframe of the plan... we would expect to see reference to the type of mitigation measures available and their deliverability set out in Policy LPD09: Air Quality.	<p>To address this point we intend to include the following text in the supporting text of the Local Plan Policy LPD09 to expand upon the requirement in point (3) of that policy¹:</p> <p><i>“The precise details of the measures to be delivered in response to point (3) of policy LPD09 must be devised for each project as they depend on the details of the development itself. However, effective measures available to address air quality impacts of large developments (depending on the type of development) include:</i></p> <ol style="list-style-type: none"> 1. <i>Electric vehicle charging points at parking spaces. The government has committed to ceasing the sale of all new petrol and diesel cars and vans from 2040. In the latter part of the plan period therefore people can be expected to show particular interest in electric vehicles;</i> 2. <i>Provision of a communal minibus (particularly if electric), and car club space. This will be effective for housing developments but particularly for employment developments;</i> 3. <i>Cycle parking and shower facilities for staff;</i> 4. <i>On-site services (e.g. GP surgery’s and shops) to reduce need for off-site movements;</i> 5. <i>Personalised Journey Planning services for residents. If employment premises the company could provide incentives for car-sharing and minimising car journeys for work;</i> 6. <i>Production of sustainable travel information for</i>

¹ Which states that ‘New development that would result in increased traffic flows on the M62 past Manchester Mosses Special Area of Conservation (SAC) of more than 1000 vehicles per day or 200 Heavy Goods Vehicles (HGVs) per day must be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on ecological interests within the SAC. Where such effects are identified they would need to be considered in accordance with Policy LPC06’.

		<p><i>residents e.g. accurate and easily understandable bus timetables;</i></p> <p>7. <i>Implementation of a Staff Management Plan to place restrictions on car use by Staff;</i></p> <p>8. <i>For vehicles generating HGV movements, restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.”</i></p> <p>We consider this is too detailed for policy text and also inappropriate to include in policy text since it constitutes examples only, hence it would be included in supporting text.</p>
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Functionally Linked Land	<p>Natural England advises that more certainty is needed in relation to the availability of suitable mitigation land should it be required at project stage...We advise that the Biodiversity SPD needs to be clearly referred to in the Plan...In addition to stating that the SPD will be the framework for mitigation it should include the time frame for the development of the SPD, the availability of suitable mitigation sites and the arrangement for allocation sites that come forward prior to the completion of the SPD.</p>	<p>We have a draft Nature Conservation SPD (attached to this response) which we will refer to more specifically in the policies of the Plan. We would welcome any comments you have on the SPD.</p> <p>We are proposing to publish a draft of the SPD when we submit the Plan for examination and adopt the SPD on adoption of the Plan. While there are not currently any specific sites identified for mitigation, the Borough has a significant amount of available agricultural land that could be used for feeding for passage and overwintering birds (this is referred to in the SPD), and the suitability of these sites will be assessed at the planning application / masterplanning stage when developers look to enter into management agreements with landowners.</p> <p>In addition, at the strategic level, the Liverpool City Region has an agreed evidence base which is the LCR Ecological Network which clearly identifies opportunities for delivery of mitigation and habitat enhancement through the Nature Improvement Areas; this will inform (where appropriate) and supplement the site specific mitigation.</p>
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Recreational pressure	<p>We advise that until the RMS [the Liverpool City Region Recreation Mitigation Strategy] is developed and adopted a borough wide strategy for addressing the in-combination impacts from recreational pressure is included in the Local Plan. The relevant Policy should be worded in such a way that this interim position will be superseded when the RMS is finalised and adopted.</p>	<p>For St. Helens, the RMS is only one part of our mitigation strategy, with the other being the Bold Forest Park.</p> <p>The Bold Forest Park (BFP) Area Action Plan forms part of the St. Helens Local Plan and provides a framework for the development of the BFP area. Bold Forest Park (BFP) occupies an area of 1,800ha in the southern-most part of St Helens Borough, such that many residents would need to pass the park in order to visit the Mersey Estuary SPA and Ramsar site. The location of BFP on the urban fringe of St. Helens makes it potentially accessible to a large sub-regional population.</p> <p>The Forest Park is 2 miles from St. Helens Town Centre and well served by public transport, providing a sustainable and accessible recreational resource for residents to enjoy. This increases the likelihood of people visiting the park instead of the SPA and Ramsar site (or other parts of the Merseyside coast) for regular casual recreation and dog-walking. In that sense, we already have a borough-wide initiative to provide a very large net semi-natural greenspace recreational resource closer to home than any of the European sites, which is not the case for any of the other Liverpool City Region authorities. St Helens is therefore not as reliant on the RMS as some of the other Liverpool City Region authorities.</p> <p>In addition, policies within the Bold Forest Park AAP seek to ensure that new development in the BFP contributes to the further enhancement of the BFP, including improving connectivity between the Borough's urban area and the Forest Park and contributing financially to the infrastructure of the Park. Therefore the attractiveness and 'draw' of the park is only likely to increase in the</p>
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		<p>future.</p> <p>However, in light of the comments from Natural England, in the interim period until the RMS is adopted, the Council will also seek to:</p> <ol style="list-style-type: none"> 1. Increase the promotion of Bold Forest Park as a suitable alternative sub-regional greenspace for regular recreation use – through signage, buyers' packs, web / social media advertising. 2. In accordance with the monitoring framework of the Bold Forest Park AAP undertake a visitor survey of the Bold Forest Park and undertake such surveys at other SANGs / greenspaces, which will help provide evidence of where visitors come from and how this is linked to new housing development in the Borough. 3. Where appropriate, and evidence-based, require new development beyond the BFP AAP area to provide a financial contribution for improvements in the functionality and management of the BFP to mitigate for any recreation impacts on the LCR European Sites. <p>We would be happy to reference this proposed approach in the supporting text to Policy LPC 06.</p> <p>We consider this would adequately cover the interim period until adoption of the RMS which we understand could be adopted in early 2020.</p> <p>In any case, any future mitigation must be proportional to the likely impact of development on the integrity and conservation objectives of the coastal European sites. In</p>
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		<p>our view, given the distance between St. Helens and the European Sites, the likelihood of adverse impacts from development in St Helens on the European sites is likely to be minimal, especially if you consider the current evidence within the Liverpool City Region European Sites Recreation Mitigation and Avoidance Strategy (revised draft July 2018, Footprint Ecology). Paragraph 5.28 of this document indicates that when all evidence from the 8 LCR survey points we pooled, just 1% of visits to the coastal European sites were from St Helens. Likewise, the draft Sefton Visitor Survey (2018) shows that just 3.2% of recorded visits to Ainsdale on Sea, and 2.7% to Crosby Coastal Park, were from St Helens. Far higher proportions were from other areas.</p> <p>Nevertheless, the Council has made a clear commitment to continue participating in the development of the RMS, including addressing the current evidential gaps identified. This includes some further investment in additional evidence gathering.</p> <p>The Council is also supportive of the publication of the draft evidence base (work completed to date) plus interim measures per authority, until the RMS has been completed and been through the necessary consultation and approvals processes.</p>
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Continued engagement with Highways England after Local Plan Submission Draft stage (2019)

Email from Highways England to St Helens Council – 17/07/2019

From: "Johnson, Adam"

To: Jonathan Clarke

Date: 17/07/2019 09:25

Subject: RE: St Helens Borough Local Plan 2020-2035 (submission draft) - Highways England response

Dear Jonathan

Thank you for providing the comments on our response to your Draft Local Plan. Please accept my apologies for not responding sooner.

I have now reviewed your comments and can confirm that Highways England are satisfied with the information provided and the proposed change in wording which will be recommended as part of the independent examination to follow later in the year. This offers us further assurance that our network will be protected as part of the Plan. We are also content with the proposals for further transport modelling as part of the Bold Garden Suburb site.

We look forward to working with you further as the Local Plan progresses.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD

Web: <http://www.highwaysengland.co.uk>

Email from St Helens Council to Highways England – 24/06/2019

From: Jonathan Clarke

Sent: 24 June 2019 17:32

To: Johnson, Adam

Subject: St Helens Borough Local Plan 2020-2035 (submission draft) - Highways England response

Dear Adam,

I am writing in response to your letter dated 13 March 2019, and to the meeting in St Helens Council offices on 9 April.

Firstly, I would like to apologise for the delay in responding. However, we would now like to work quickly to clarify the way forward in addressing your comments about the St Helens Borough Local Plan.

I can confirm that we now aim to submit the Plan to the Secretary of State in early autumn 2019. The independent examination will start at that point.

With this in mind, I set out (in the table attached to this e-mail) our comments on the matters set out in your letter. Our response identifies where we may recommend changes to parts of the Plan (e.g. to policy wording) to address the matters raised in your letter. Whilst we do not currently envisage formally changing the Plan before it is submitted, we may be happy (subject to necessary approval within the Council) to put changes forward for the Inspector to consider as part of the examination process.

In line with our discussion at the meeting on 9 April, we consider that the existing transport evidence base underpinning the Plan is fundamentally sound. However, we do propose to:

- commission further detailed transport modelling for the Bold Garden Suburb site, to underpin the future master planning of this large site (see attached brief); and
- update elements of the St Helens Infrastructure Delivery Plan (IDP).

We would also – once we have confirmed areas of agreement – like to publish a Statement of Common Ground (SoCG) with Highways England. We wish to continue the positive engagement and co-operation that has taken place with Highways England throughout the Local Plan preparation process. As a first stage, I would be pleased if you would provide your views on the points we set out in the attached table (by 8 July 2019 if possible).

Please do not hesitate to contact me if you require any further details.

(See attached file: Bold Forest Garden Suburb Study Transport Review_Issue.pdf)(See attached file: St Helens Local Plan_officer response to HE comments June 2019.pdf)

Best Regards,
Jonathan Clarke,
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

Comments on Highways England letter dated 13 March 2019

<u>Issue</u>	<u>Summary of HE comment</u>	<u>Comments of StHBC officers (19/6/19)</u>
Major Road Network (page 1 of HE letter)	The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region.	<p>We agree and suggest that a new paragraph could be inserted immediately after paragraph 4.27.8 in the Local Plan as follows:</p> <p><i><u>“Proposed Major Road Network</u></i></p> <p><i>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.</i></p>
Strategic Employment Sites (page 1 and 2 of HE letter)	The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately.	<p>The key issue raised here appears to be that the Local Plan should, in HE’s view, set out more detailed transport infrastructure evidence base and requirements for each allocated employment site.</p> <p>Our comments are as follows:</p> <ul style="list-style-type: none"> • The TIA documents published with the Local Plan address cumulative impacts on the highway

<u>Issue</u>	<u>Summary of HE comment</u>	<u>Comments of StHBC officers (19/6/19)</u>
	<p>Site-specific analysis should be undertaken for each of the proposed allocated development sites to enable individual and cumulative impacts to be assessed. This should include site-specific infrastructure requirements at the Local Plan level.</p> <p>The most relevant site allocations to the SRN, due to their size and proximity to SRN junctions with existing performance issues, are as follows:</p> <ul style="list-style-type: none"> • 1EA – Omega South Western Extension, Bold; • 2EA – Florida Farm North, Slag Lane, Haydock; • 3EA – Land north of Penny Lane, Haydock; • 4EA – Land south of Penny Lane, Haydock; • 5EA – Land to the west of Haydock Industrial Estate, Haydock; • 6EA – Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock; • 7EA – Parkside East, Newton-le-Willows; • 8EA – Parkside West, Newton-le-Willows; and • 10EA – Land at Lea Green Farm West, Thatto Heath. 	<p>network. Whilst the number of employment sites to be developed in the Plan period has subsequently reduced (and the Plan period moved from 2033 to 2035) we still consider the findings of this work to be robust.</p> <ul style="list-style-type: none"> • Appendix 5 of the LPSD 'Site Profiles' sets out requirements for each of the allocated employment sites. Details for Parkside East (site 7EA) are set out in Policy LPA10. • Sites 2EA, 3EA, and 10EA are subject to current planning permissions (which are already partly or fully implemented). Appendix 5 refers to these permissions. There would be little benefit in the Plan stating further requirements for these sites. • Further evidence about transport impacts linked to sites 5EA and 8EA and the Parkside link road (to serve sites 7EA and 8EA) will be assessed when current planning applications for those sites are determined. • We are not currently convinced that there is a need for new evidence to be commissioned as part of the Local Plan process to address transport impacts from the allocated employment sites. However, we are happy to review the requirements stated in appendix 5/policy LPA10 of the Plan for sites 1EA, 4EA, 5EA, 6EA, 7EA and 8EA. This process could draw from the currently published Local Plan TIA documents and from current studies (e.g. for M6 Junction 23) where appropriate. We will seek the views of HE on any suggested changes to these

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		<p>requirements before the Local Plan is submitted for examination.</p> <ul style="list-style-type: none"> The Council is working in partnership with Highways England and Wigan Council to deliver the M6 Junction 23 Study. This Study will provide a detailed identification of capacity issues and an outline of potential options for further development. It is envisaged that it will ultimately determine the scale and design of a potential large scale improvement scheme for Junction 23. Therefore, any required infrastructure improvements to Junction 23 from relevant employment sites that do not already have a planning permission (4EA, 5EA and 6EA), will be informed by the findings of this Study.
<p>Housing Sites (page 2 of HE letter)</p>	<p>The following housing sites are likely to have the greatest impact on the SRN:</p> <ul style="list-style-type: none"> 1HA - Land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood, 2HA – Land at Florida Farm, Slag Lane, Blackbrook 4HA – Bold Forest Garden Suburb, Bold 5HA – Land south of Gartons Lane, Bold 6HA – Land east of City Road, Cowley Hill, Town Centre 7HA – Land to the west of the A49 Mill Lane, Newton-le-Willows 9HA – Former Linkway Distribution Park, 	<p>The key issue raised here appears to be that the Local Plan should, in HE's view, set out more detailed evidence base and infrastructure requirements for each allocated housing site.</p> <p>Our comments are as follows:</p> <ul style="list-style-type: none"> The TIA documents published with the Local Plan address cumulative impacts on the highway network. Whilst the number of housing sites to be developed in the Plan period has subsequently reduced (and the Plan period moved from 2033 to 2035) we still consider the findings of this work to be robust. Appendix 5 of the LPSD 'Site Profiles' sets out requirements for each of the allocated housing sites.

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	<p>Elton Head road, Thatto Heath; and</p> <ul style="list-style-type: none"> • 10HA – Moss Nook Urban Village, Watery Lane. <p>Highways England would welcome early involvement during the planning process for each of these sites.</p>	<ul style="list-style-type: none"> • Sites 3HA, 9HA, and 10HA are subject to current planning permissions (of which that for 3HA is in the course of being implemented). Appendix 5 refers to these permissions. There would be little benefit in the Plan stating further requirements for these sites. • We agree that further evidence will be needed to assess in more detail the transport impacts from the Bold Garden Suburb site (4HA). This is due to the scale of this site (2,988 units). A brief for the first stage of this work is attached. Whilst the soundness of the Plan does not in our view depend upon this work (due to the limited level of development anticipated here in the Plan period) this evidence will help inform the overall master planning of the site which will extend well beyond 2035. • We are not currently convinced that there is a need for new evidence to be commissioned as part of the Local Plan process to address transport impacts from the other allocated housing sites. However we are happy to review the requirements stated in appendix 5 of the Plan for sites 1HA, 2HA, 4HA, 5HA, 6HA, and 7HA. This process could draw from the currently published TIA documents and from current studies (e.g. for M6 Junction 23) where appropriate. We will seek the views of HE on any suggested changes to these requirements before the Local Plan is submitted for examination.
Sustainability (page 3)	Policy LPA03 should set specific detail about how the local authority will guide development	Disagree – the purpose of Policy LPA03 is to set out a basic set of principles. In practice, development will be

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	to be focussed in sustainable and accessible locations.	guided towards sustainable locations through the restraint on development in the Green Belt and via the operation of Policy LPA07. This does not need to be spelt out in Policy LPA03. The approach taken is consistent with the requirement in the NPPF for development plans to be concise.
Sustainability (page 3)	The measures proposed to address sustainable transport accessibility for the proposed site allocations are light touch and place a strong emphasis on future documents such as the LCR LCWIP, Transport Assessments/Statements and Travel Plans.	Comment noted. We aim to address this as part of our review of the site requirements listed in appendix 5 (see earlier comments). We will also prepare an updated Infrastructure Delivery Plan before we submit the Plan for examination. We will seek the views of Highways England as part of this process.
Transport and Travel Plans (pages 3 and 4)	The requirement for Travel Plans to be implemented for each development site should be set out in Policy LPA07 due to their inherent ability to mitigate the traffic impacts of development on both the local and strategic road network.	We agree that clause 4 of Policy LPA07 should address this and suggest the following wording: “4. To minimise air and noise pollution and carbon emissions, non-residential forms of development that would generate a significant amount of transport movement by employees or visitors must be supported by suitably formulated Travel Plans. <u>Conditions and/or legal agreements will be used to ensure that Travel Plans submitted in such cases are fully implemented and monitored.</u> ”
Transport and Travel Plans (page 4)	Where development is projected to cause severe harm to the highway network, as set out in the NPPF, the Council must have and / or develop suitable testing mechanisms. However, no assessment criteria for analysing this impact are currently set out in	We consider that the definition of “severe harm” would be more appropriately addressed at a sub-regional or national level. When assessing the traffic impacts and severity of individual development proposals, the Council currently

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	the Draft Local Plan.	considers a range of factors, such as impact on road capacity, traffic safety, traffic routeing and design. The detailed transport impacts of individual development proposals will continue to be assessed in this manner as specific proposals come forward. However, in principle, with the measures proposed within the Local Plan, the traffic impacts of the development proposed in the Local Plan are capable of being addressed to the extent that they would not be severe.
Transport and Travel Plans (page 4)	The Local Plan should make it evidently clear to developers that any alterations to the SRN are taken as a last resort and, if required, should be clearly demonstrated through the following initial two stages: Avoidance and Off-Line improvements.	We agree that clause 6 of Policy LPA07 could be expanded and suggest the following wording: “6. Direct access from new development on to the Strategic Road Network will only be permitted <u>as a last resort</u> , where agreed by Highways England <u>and where the necessary levels of transport accessibility and safety could not be more suitably provided by other means</u> ”.
Highway Impact Assessment Methodology (page 5)	There is a two-year difference between the transport evidence base and the proposed end-date of the Plan period. Using a 2017 base year in the TIA may underrepresent the current situation through not including two years of growth from 2017 to 2019.	The TIA was based on the proposed development and timeframes in the Local Plan Preferred Options and therefore models a larger amount of development than that proposed in the Publication Draft Plan. The TIA is therefore unlikely to under-represent the amount of growth to 2035. In addition we plan to update the TIA every 5 years.
Key Strategic Road Network Junctions (pages 5 and 6 of HE letter)	The IDP should refer to M6 Smart Motorway Improvements J21a to 26 a committed infrastructure scheme. The IDP should refer to M6 Junction 22 as a	We note these points and intend to prepare an updated version of the Infrastructure Delivery Plan before submitting the Plan to the Government. We will seek the views of Highways England as part of this process.

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	<p>key junction requiring assessment for improvement considering its proximity to the Parkside developments and the provision of 'safe access to J22 for HGVs' is now a policy requirement for the delivery of Parkside. Junction 22 should be identified as a 'pressure point' within the highway system, as the proposed developments at Parkside East and West, alongside planned growth along the M6 corridor in the neighbouring District of Wigan, are likely to impact the junction.</p> <p>Transport modelling associated with M62 Junction 22 should be further interrogated to understand the impact of growth proposals associated with the proposed Parkside East and West development site allocations as well as the cumulative development impact along the M6 corridor associated with development in Wigan.</p> <p>The IDP does not address the capacity of the existing infrastructure, nor does it set out any detail regarding the type or scale of interventions which may be required following the adoption of the Local Plan and build-out of subsequent developments. It also does not give any indicative timescales for delivery of required infrastructure.</p>	
SRN Junction	Various points made about the capacity of	See earlier comments set out above. As stated earlier we

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Performance in Future Scenarios (page 6 and 7 of HE letter)	junctions on the SRN. The Transport Impact Assessment has highlighted that M62 Junction 8; M6 Junction 23; and M6 Junction 24 will exceed capacity by 2033. The inclusion of a comprehensive site-based analysis would provide a more robust evidence base.	acknowledge the need to prepare further evidence to underpin the future master plan for Bold Garden Suburb and to update the IDP. However, we otherwise consider the transport evidence base for the Plan to be 'proportionate' and therefore compliant with the NPPF.