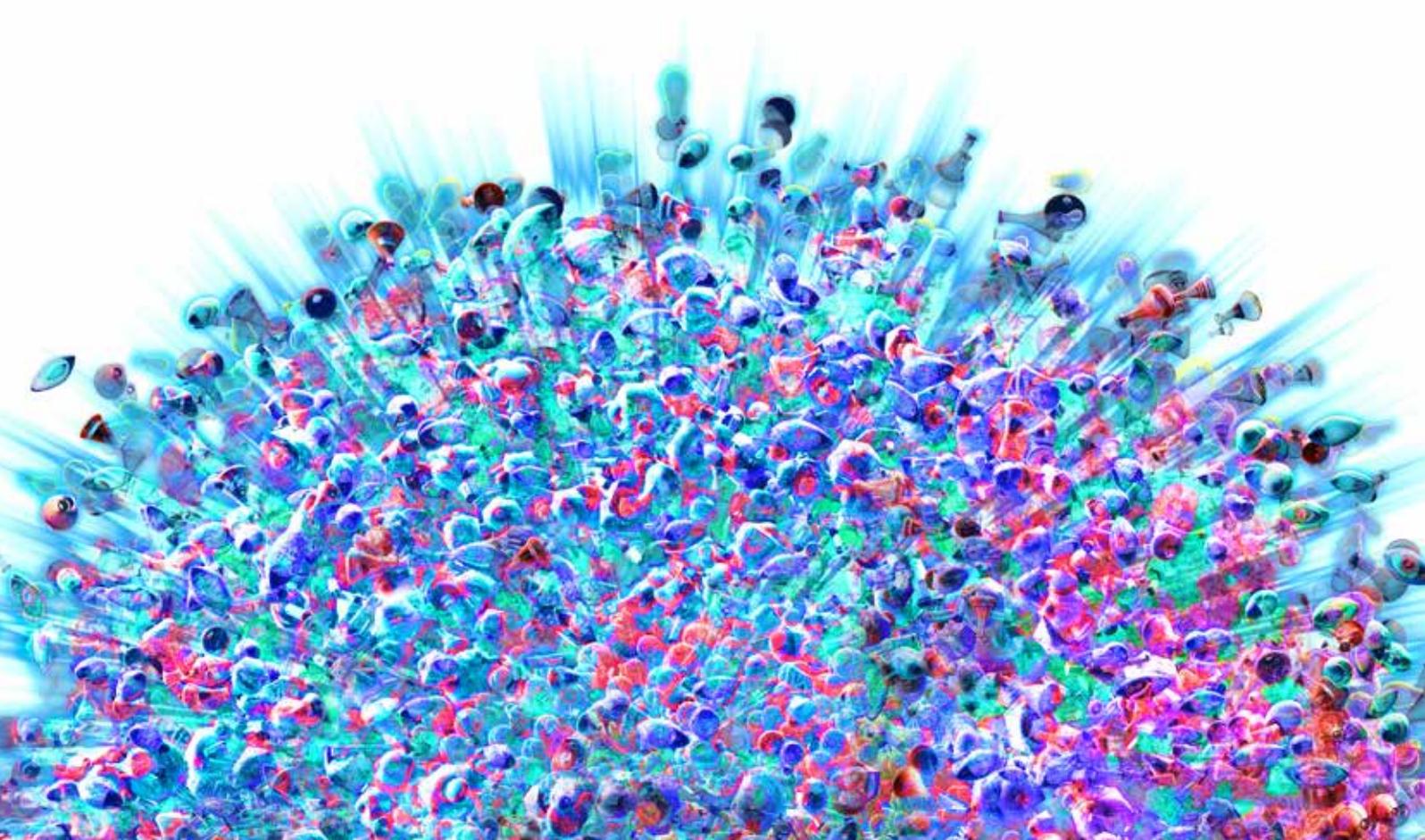




St. Helens  
Council

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 attributed<sup>1</sup> 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.

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<sup>1</sup> 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.

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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**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 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 "material considerations indicate otherwise – taking into account whether".	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: "This will take into account the need expressed in the NPPF to 'boost significantly' the supply of housing."	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 "where appropriate". 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 "exceptional circumstance" 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 Landor 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 LPPC05 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 LPPC06, LPPC07, LPPC09 and LPPC10 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
E1447, West Lancashire Council	Support the inclusion of Garswood as a Key Settlement 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 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 LPP0 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
EF0260, 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.

<b>POLICY LPA02 - SPATIAL STRATEGY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 Lantor 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 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.

<b>POLICY LPA03 - DEVELOPMENT PRINCIPLES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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> .

<b>POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 "provide the necessary infrastructure and services" 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 "the safe and efficient flow of traffic on the surrounding highway network." 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).

<b>POLICY LPA04 - A STRONG AND SUSTAINABLE ECONOMY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
LPPO592, Great Sankey PC	<p>The removal of this site from the Green Belt is unjustified – development of this site is contrary to the purposes of Green Belt.</p> <p>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</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 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.</p> <p>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.</p>

<b>SITE EA1 - OMEGA SOUTH WESTERN EXTENSION</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	<p>Brownfield land in St.Helens should be developed on first</p> <p>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.</p>	<p>Policy LPA02 promotes the reuse of brownfield land in key sustainable locations.</p> <p>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.</p>
	<p>No public transport linkages have been proposed.</p>	<p>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.</p>
	<p>Development would result in increase of HGVs and associated pollution across nearby residential areas.</p>	<p>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.</p>
	<p>Sections of ancient woodland will be threatened and removed.</p>	<p>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.</p>

**SITE EA1 - OMEGA SOUTH WESTERN EXTENSION**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<p><b>SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK</b>            (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)</p>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<p><b>SITE EA2 - FLORIDA FARM NORTH, SLAG LANE, HAYDOCK</b>            (note: planning permission has now been granted for an employment development on this site, which is in the course of being implemented)</p>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE EA3 - LAND NORTH OF PENNY LANE, HAYDOCK</b>		
(note: planning permission has now been granted for an employment development on this site)		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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. LPO 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, LPO 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, LPO site EA4 is still to be removed from the Green Belt but is to be safeguarded to meet potential needs after 2035.

<b>SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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. 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	<p>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.</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. 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	<p>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.</p>	<p>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.</p>

<b>SITE EA4 - LAND NORTH EAST OF JUNCTION 23 M6, SOUTH OF HAYDOCK RACECOURSE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1448 Wigan Council	Generally supportive, Site EA4 should complement the racecourse and promote the site as a regional facility. Happy with the release of land for site EA5, but not happy with the types of use proposed.	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. Support noted.
<b>SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1465, Y. Fovargue MP for Makerfield	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.  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. 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.  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.

<b>SITE EA5 - LAND SOUTH OF PENNY LANE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE EA6 - LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 “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.
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.

<b>SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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. LPO 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, LPO 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.

<b>SITE EA7 - LAND WEST OF MILLFIELD LANE, SOUTH OF LIVERPOOL ROAD AND NORTH OF CLIPSLEY BROOK, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE EA8 - PARKSIDE EAST, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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. Site should be redeveloped into a science technology park instead of warehousing.	Comment noted. 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.

<b>SITE EA9 - PARKSIDE WEST, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.	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.  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.

<b>SITE EA10 – LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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
<b>SITE EA11 - LAND AT LEA GREEN FARM WEST, THATTO HEATH</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE EA12 - GERARDS PARK, PHASES 2 AND 3, COLLEGE STREET, ST.HELENS TOWN CENTRE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1461, Croft Parish Council	Concern that too many HGV's may take routes through residential villages.	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 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	Object to sites EA8 & EA9 due to the impact on GB and the M6 and local roads, as this development will create more traffic.	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.

<b>POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>POLICY LPA04.1 STRATEGIC EMPLOYMENT SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 complements 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**

<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS</b>	
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>
	Further work is necessary to justify the level of growth proposed. The OAN for the new LP should be based on the SHELMA numbers.
	Five representors commented that density should be considered on a case by case basis and not impose broad ranging density requirements.
	Density requirements should be scrapped.
	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.
	Four representors expressed concern that Part 4 is too vague and that infrastructure considerations should be considered now.
	How each main issue has been addressed in the LPSD
	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.
	Comment noted. The density requirements in Policy LPA 05 are minima but allow some flexibility in specific circumstances.
	Density requirements are retained in Policy LPA05. This approach is in line with national planning policy.
	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.
	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
E1250, Rainford Action Group	<p>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.</p> <p>The St.Helens Local Plan assumes an increased population based almost entirely on "Unexplained Population Change" (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.</p>	<p>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.</p> <p>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.</p>
E1250, Rainford Action Group	<p>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.</p> <p>The Council has not calculated a shortfall in and as such additional sites should be allocated.</p>	<p>LPSD housing figures are based on robust local evidence as set out above.</p>
	<p>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.</p>	<p>LPSD housing figures are based on robust local evidence.</p> <p>Comment noted. There is no justification for bringing forward additional land from the Green Belt beyond that proposed in the LPSD.</p>

<b>POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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>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	Support Alternative Option 2 for a housing target of 712 dpa based on our assessment of the adjustments needed to the SHMA.	Comment noted.
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>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>

<b>POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>POLICY LPA05 - MEETING ST.HELENS HOUSING NEEDS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 LGR 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

<b>SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HA1 - LAND ADJOINING ASH GROVE FARM, BEACON ROAD, BILLINGE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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
<b>SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA2 - LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 LPP0 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.

<b>SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA3 - LAND AT FLORIDA FARM (SOUTH OF A580), SLAG LANE, BLACKBROOK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HA4 - LAND EAST OF CHAPEL LANE AND SOUTH OF WALKERS LANE, SUTTON MANOR, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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'.

<b>SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	<p>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.</p> <p>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.</p> <p>Flood risk – this field is often water logged and if developed would have drainage issues.</p> <p>Wildlife/ecology – development would lead to the loss of wild life habitats including birds, frogs, bees, butterflies, newts, hedgehogs – all seen at this site.</p>	<p>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.</p> <p>Policy LPC09 addresses the visual impact from new development.</p> <p>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.</p> <p>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.</p>

<b>SITE HA5 - LAND SOUTH OF GARTONS LANE AND FORMER ST.THERESA'S SOCIAL CLUB, GARTONS LANE, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
		[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.

<b>SITE HA6 - LAND SOUTH OF REGINALD ROAD/BOLD ROAD - NORTHERN SECTION (PHASE 1), BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA7 - LAND BETWEEN VISTA ROAD AND ASHTON ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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. 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. 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
E1470, Cllr Haw	<p>There are better brownfield sites near the M62 and Linkway.</p> <p>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.</p> <p>There is insufficient infrastructure to support housing on the site.</p> <p>Increased traffic result in increased traffic and pollution along surrounding roads.</p> <p>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.</p>	<p>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.</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>Infrastructure issues are addressed in Policy LPA08.</p> <p>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.</p> <p>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.</p>

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HA8 - ECCLESTON PARK GOLF CLUB, RAINHILL ROAD, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA09 -HIGHER BARROWFIELD FARM, HOUGHTON'S LANE, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 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.

<b>SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 Eilams Brook runs along the southern perimeter. No adverse impact should be demonstrated.	Site is discounted as an allocation

<b>SITE HA10 - LAND SOUTH WEST OF M6 J23 BETWEEN VISTA ROAD AND LODGE LANE, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.
<b>SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA11 - LAND AT MOSS BANK FARM, MOSS BANK ROAD, MOSS BANK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.
<b>SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEIGH ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
E1548, NHS Property Services	The topography of the site being on a slope will make it expensive to develop. 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.	Comment noted. Site HA12 has been discounted as an allocation in the LPSD. 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.

<b>SITE HA12 - FORMER NEWTON COMMUNITY HOSPITAL (SIMMS WARD), BRADLEGH ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA13 - FORMER RED BANK COMMUNITY HOME, WINWICK ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA14 - LAND SOUTH EAST OF LORDS FOLD, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 Lantor 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).

<b>SITE HA15 - LAND SOUTH OF HIGHER LANE AND EAST OF ROOKERY LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 LPSD
	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. LPO 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.

<b>SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HA16 - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>POLICY LPA05.1 STRATEGIC HOUSING SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 developed 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.
E1564, De Pol Associates Ltd. on behalf of Metacre Ltd.	Three developers object to the 25m easement, and consider it should be 15m or less. 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.	Comment noted 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 "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.
	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.	LPO 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.

<b>POLICY LPA05.1 STRATEGIC HOUSING SITES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 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.

<b>POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 Gorse 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.

<b>POLICY LPA06 EXTENT OF GREEN BELT AND SAFEGUARDED LAND</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 1 ha and has the capacity for 330 dwellings.	Comment noted. This land is proposed to remain in the Green Belt.

<b>SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE ES-01 - OMEGA NORTH WESTERN EXTENSION, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE ES-02 - OMEGA SOUTH - WESTERN EXTENSION PHASE 2, LAND NORTH OF BOOTH'S WOOD, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS01 -LAND NORTH OF STRANGE ROAD AND WEST OF CAMP ROAD, GARSWOOD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS02 - LAND SOUTH OF LEYLAND GREEN ROAD, NORTH OF BILLINGE ROAD AND EAST OF GARSWOOD ROAD, GARSWOOD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.	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. 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. Further details of the reasons for the proposed approach are set out in the Green Belt Review 2018.
	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.

<b>SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.
E1542, 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

<b>SITE HS03 - BOLD FOREST GARDEN SUBURB: LAND SOUTH OF REGINALD ROAD/BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HS04 - LAND NORTH OF BELL LANE AND SOUTH-WEST OF MILTON STREET, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS05 - LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS05 - LAND TO WEST OF BRIDGE ROAD AND SWEET BRIER COURT, OFF CLOCK FACE ROAD, BOLD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS06 LAND OFF COMMON ROAD/SWAN ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS07 - LAND BETWEEN ASHTON ROAD AND M6, EARLESTOWN, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS08 - LAND SOUTH OF BURROWS LANE, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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
<b>SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HS09 - LAND SOUTH OF HOWARDS LANE/EAST OF GILLARS LANE, ECCLESTON</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS10 - LAND SOUTH OF FORMER CENTRAL WORKS, BELLEROPHON WAY, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS11 - LAND SOUTH OF STATION ROAD, HAYDOCK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS12 - LAND AT MARTINDALE ROAD, CARR MILL, MOSS BANK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS13 - LAND AT OLD HEY FARM, SOUTH OF TYRER ROAD, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1458, Winwick PC	Development of this site will generate further traffic putting more pressure on already heavily congested roads. 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.

<b>SITE HS14 - LAND EAST OF NEWLANDS GRANGE, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS15 - LAND EAST OF ROB LANE AND REAR OF CASTLE HILL, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS16 - LAND TO REAR OF 6 ASHTON ROAD AND ELMS FARM AND WEST OF ROB LANE, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS17 - LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1458 Winwick PC	Site is Green Belt and should not be developed.  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.	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.  Comment noted. Traffic issues would be addressed under Policy LPA07.

<b>SITE HS17 - LAND WEST OF WINWICK ROAD AND SOUTH OF WAYFARERS DRIVE, NEWTON-LE-WILLOWS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS18 - LAND EAST OF HIGHER LANE/SOUTH OF MUNCASTER DRIVE/AT WHITE HOUSE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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

<b>SITE HS19 - LAND SOUTH OF BUSHEY LANE/RED DELPH FARM, RED DELPH LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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
E1484, PWA Planning on behalf of Mr L. Martin	<p>The site could be converted into a park/dog walking area.</p> <p>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.</p>	<p>See above</p> <p>See above</p>
E1558, Savills on behalf of The Knowsley Estate	<p>Approve of meeting development needs after 2033 and deletion of this land from the Green Belt for safeguarded land is supported.</p>	<p>See above</p>
E1459, Cllrs Jones, Mussell & Reynolds (Rainford Ward Councillors)	<p>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.</p>	<p>See above</p>

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

<b>SITE HS20 - LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>SITE HS20 - LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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
<b>SITE HS21 - LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE, RAINFORD</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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 Red 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

<b>SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HS22 - LAND AT HANGING BRIDGE FARM, ELTON HEAD ROAD, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E0224, Rainhill Civic Society	Development of this site will start the merger of settlements contrary to Green Belt objectives.  Development of this site would lead to further highway problems. Safeguarded land should not come forward unless the Local Plan is further reviewed.	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.  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.

<b>SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>SITE HS23 - LAND SOUTH OF MILL LANE, EAST OF HALL LANE, WEST OF NORLANDS LANE AND NORTH OF M62, RAINHILL</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1460, Cllr Glover	<p>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)</p> <p>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.</p>	<p>See above.</p> <p>See above.</p>

<b>SITE HS24 - LAND SOUTH OF ELTON HEAD ROAD , THATTO HEATH</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	<p>Development of the site will lead to urban sprawl and should not be removed from the Green Belt.</p>	<p>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.</p>

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 "maintain the safe and efficient flow of traffic on the surrounding highway network". 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
E1494, Merseytravel	<p>Welcome the reference and support given to the Skelmersdale Rail Link proposals (E1447, West Lancashire Council).</p> <p>Would be useful to make reference to other transport strategies such as the LCR Rail Strategy, Bus Strategy, Freight &amp; Logistics Strategy, etc.</p>	<p>Support noted</p> <p>Policy LPA07 refers to key strategic documents in the supporting text.</p>
E1495, CPRE	<p>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.</p>	<p>Policies LPA02 and LPA07 address the issue of sustainable transport.</p> <p>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>
E1496, Highways England	<p>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.</p>	<p>Policy LPA07 has been amended to confirm the Council's intention to review the SPD.</p>
E1511, Turley on behalf of Peel Holdings (Land and Property Ltd.) and Peel Energy	<p>Support for criterion 6.</p>	<p>Support noted</p>

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.

<b>POLICY LPA08 - INFRASTRUCTURE AND FUNDING</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPA08 - INFRASTRUCTURE AND FUNDING</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
LPPO140, 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> .

<b>POLICY LPA08 - INFRASTRUCTURE AND FUNDING</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 " <i>where required</i> ".	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

<b>POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 SFRl. 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.

<b>POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>POLICY LPA10 - DEVELOPMENT OF STRATEGIC RAIL FREIGHT INTERCHANGE (PARKSIDE)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1482, Spawforths 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, Spawforths 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.

<b>POLICY LPB01 - ST.HELENS TOWN CENTRE AND CENTRAL SPATIAL AREA (CSA)</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>POLICY LPB02 - EARLESTOWN TOWN CENTRE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.  Suggest that this policy incorporates more flexibility to allow an assessment of site specific needs.	Support noted
		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 LPSD
EFPO260, 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 sub-script 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.

<b>POLICY LPC02 - AFFORDABLE HOUSING PROVISION</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC02 - AFFORDABLE HOUSING PROVISION</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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).
E1542, Barton Wilmore	Support the flexibility of this policy in terms of site by site basis and viability assessments.	Support noted
E1543, Barton Wilmore on behalf of Jones Homes (North West) Ltd.	Support criteria 3 & 4 of this policy	Support noted
E1549, Persimmon Homes North West	The caveat to relax affordable housing provision following a viability assessment is supported.	Support noted
E1556, JLL on behalf of Suttons Group	Supports part 3, and it is considered important that the Council demonstrate flexibility in renegotiating the amount and tenure of affordable housing.	Support noted.
	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.

<b>POLICY LPC03 - GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC04 - RETAIL AND TOWN CENTRES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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, Spawforths 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.

<b>POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.	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). 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.
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 Landor Associates	Support the Policy, Rainford Golf Course is covered by this policy and as such should be removed from the GB.	Support noted.

<b>POLICY LPC05 - OPEN SPACE AND OUTDOOR SPORTS FACILITIES</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.  Playing fields at Sidac should be designated as Local Green Space.	Comment noted. Enhancement is referred to in clause 1 of the Policy.  The Sidac Playing Field has received planning permission (Ref.P/20170890) for residential development. The site is not designated as a Local Green Space.

<b>POLICY LPC06 - BIODIVERSITY AND GEOLOGICAL CONSERVATION</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 in 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.

<b>POLICY LPC07 - GREENWAYS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC08 - ECOLOGICAL NETWORK</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC09 - LANDSCAPE PROTECTION AND ENHANCEMENT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC10 - TREES AND WOODLAND</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
Rep.ref.no.	Summary of main issue	How each main issue has been addressed
	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.

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

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

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.

<b>POLICY LPC13 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPC14 - MINERALS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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

<b>POLICY LPC15 – WASTE</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
E1495, CPRE	Broadly supportive of policy	Support noted
<b>POLICY LPD01 - ENSURING QUALITY DEVELOPMENT IN ST.HELENS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 "where possible" 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 LPSD
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 LPSD 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 LPSD, primarily policy LPC11.

<b>POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPD03 - OPEN SPACE AND RESIDENTIAL DEVELOPMENT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.
<b>POLICY LPD04 - HOUSEHOLDER DEVELOPMENTS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
	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.

<b>POLICY LPD05 - EXTENSION, ALTERATION OR REPLACEMENT OF DWELLINGS OR CONVERSION TO DWELLINGS IN THE GREEN BELT</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPD06 - DEVELOPMENT IN PROMINENT GATEWAY LOCATIONS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.

<b>POLICY LPD07 - DIGITAL COMMUNICATIONS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 LPSD.

<b>POLICY LPD08 - ADVERTISEMENTS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
None	None	N/A

<b>POLICY LPD09 - AIR QUALITY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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 LPSD
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.

<b>POLICY LPD09 - AIR QUALITY</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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
<b>POLICY LPD10 - HOT FOOD TAKEAWAYS</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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.
<b>POLICY LPD11 - HEALTH AND WELLBEING</b>		
<b>Rep.ref.no.</b>	<b>Summary of main issue</b>	<b>How each main issue has been addressed in the LPSD</b>
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. 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
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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
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Sefton Council.....	E1445
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Spawforths on behalf of Parkside Regeneration LLP .....	E1481
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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
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**Reference Index 2: Location of LPPO 'Main Issue' responses by Ref. No.**

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## 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 <sup>2</sup> or press release		●		●
Deposit in Public Buildings		●	●	●
Presentation offered to business and community groups		●	●	●
Consultation Letter/email to interest groups	●	●	●	●
Articles in Specialist Publications		●		●

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<sup>2</sup> 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](mailto:planningpolicy@sthelens.gov.uk)

→ [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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**For more information, visit: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**