St. Helens Core Strategy Publication: Report of Representations Submitted and Council Responses

18th March 2010

Please note:
• This document supersedes the “Report of and Council’s Response to Representations on Publication Core Strategy February 2010”
• This document should be printed in colour
Important note

Please note, no comments are invited on the Council’s comments, they are for the information of those who submitted the comments.

In order to view all the proposed amendments, refer to the “Amendments to St.Helens Core Strategy Publication, March 2010”, available for comment alongside this document. See http://localdevelopment.sthelens.gov.uk/site.do for more information or contact:

How Can I Get Further Information?

Please contact the Planning Policy Team as detailed below:

<table>
<thead>
<tr>
<th>Query</th>
<th>Telephone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Issues</td>
<td>01744 676190</td>
<td><a href="mailto:planningpolicy@sthelens.gov.uk">planningpolicy@sthelens.gov.uk</a></td>
</tr>
<tr>
<td>Website Issues</td>
<td>01744 676197</td>
<td><a href="mailto:kennethbowen@sthelens.gov.uk">kennethbowen@sthelens.gov.uk</a></td>
</tr>
</tbody>
</table>
How to use this document

Consultation on the “Amendments to the Publication Core Strategy” was started on 11th February 2010. The consultation was on “Focused changes”, significant changes to the Publication Core Strategy that are limited in scope. The Council also decided to consult on “minor post publication changes”, changes that it was not obliged to consult on, in the interest of transparency. These changes were contained in the “Amendments to the Publication Core Strategy February 2010” document (which has been updated). The “Report of and Council’s Response to Representations on Publication Core Strategy, February 2010” was produced summarising representations submitted and the Council’s response. This is an updated version of the Report of and Council’s Response to Representations on Publication Core Strategy February 2010. It is important to note that the document being consulted on is the “Amendments to the Publication Core Strategy March 2010”.

Following identification of errors and omissions in the changes and representations, it was decided to re-start the consultation on Thursday 18th March for 6 weeks until 5pm Wednesday 28th April. This document identifies and corrects the errors and omissions found in the “Report of and Council’s Response to Representations on Publication Core Strategy February 2010” document. This document and the printed “Report of and Council’s Response to Representations on Publication Core Strategy February 2010” should be read together as they form the “Report of and Council’s Response to Representations on Publication Core Strategy March 2010”. The March 2010 version will also be available as a completely updated document but this will not be printed and will only be available in electronic format on the LDF website.

How changes are identified

This document identifies corrections to address minor errors and omissions as bold and red, with underlining (e.g. and) for new text and strikethrough (e.g. and) for text to be deleted (or moved elsewhere). Text that is both struck-through and underlined refers to text that was inserted at the Amendments to the Publication Core Strategy stage in February 2010 but has now been deleted (or moved elsewhere). Explanatory text is in bold, black and italics.

Terms used

“Electronic versions” refers to PDF and Limehouse web versions of documents available on the St. Helens Council website, Limehouse consultation portal and sent to specific consultees on CD. Printed documents were the printed and bound paper documents available at public libraries and at Regeneration reception at St. Helens Town Hall.
Representations on Core Strategy in general

The following representations CSPUB 1855 - 1862 were accidentally omitted from the Report of Representations February 2010.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1855</td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Why considered unsound?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments made during previous consultation rounds have been dealt with in a superficial way.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes required?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Council view</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments Noted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Justification</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Council has taken account of representations and, where in agreement and could do so, made changes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in Re-Publication Core Strategy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No change.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Core Strategy Publication Draft

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1856</td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Why considered unsound?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Treatment of representations has not been in keeping with the paragraphs 9.1 to 9.3 of the Statement of Community Involvement as individuals who had made comments were not told directly what the response to their comments were.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes required?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Council view</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments Noted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Justification</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| The Statement of Community Involvement makes the following commitment:
"Following analysis of the consultation responses, a report will be prepared. The report will outline the number and type of consultation response received, and how these will be integrated into the draft Local Development Framework." People who have commented on the Core Strategy or who have asked to be notified are notified of the availability of the "Report of Representations Received Submitted and Council Response" when it is published, usually at the next stage of consultation.

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Core Strategy Publication Draft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
</tr>
<tr>
<td>Representation</td>
</tr>
<tr>
<td>Legally Compliant?</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The rates charged for paper copies of documents was excessive, especially compared to photocopying costs in Council libraries.

What changes required?

Council view
Comments Noted
Justification
This issue was raised by Mr Sargeant in a letter dated 22nd May 2009 and was responded to in a letter dated 22nd May 2009. The documents were available on the internet for viewing, download and printing either at public libraries or at home. Copies were also available at the deposit points (libraries and St. Helens Town Hall). The copying charges at Council offices are higher than at libraries as they include the cost of staff time. Paper copies of documents are available at reduced rates (some for free) to residents of St. Helens.

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Core Strategy Publication Draft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
</tr>
<tr>
<td>Representation</td>
</tr>
<tr>
<td>Legally Compliant?</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
Several documents were not available when the consultation started, including the Employment Background Paper, which was not available at Newton Le Willows deposit point as late as 23rd June (almost 6 weeks later). All papers should have been available at the start of the consultation period, regardless if the 8 week consultation exceeded the 6-week minimum.

What changes required?

Council view
Comments Noted
Justification
It is unfortunate that a printed copy of the Employment Background paper was not available at the start of the consultation, however the recollection of officers involved at that time is that the Employment background paper was available within 2 weeks of start of consultation. If it was not available at Newton Le Willows library after this time it was due to a copy having been taken by someone, however it would
have still been available on the internet (available at libraries) or by request from the planning department, and we would have replaced the missing copy if informed.

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>81816</td>
<td>CSPUB1859</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

Why considered unsound?

The report on Core Strategy Preferred Option representations was not available at deposit locations, neither was the explanatory report to the Council's Executive which made clear that only minor changes had been made to CAS 3.2.

What changes required?

Council view
Comments Noted
Justification

A copy of the representations report was supplied to Newton-le-Willows Library, as part of a package of documents. The Executive Report was not circulated, it was not a consultation document but would have been available from the Council website and on request.

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>81816</td>
<td>CSPUB1860</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

Why considered unsound?

Efforts to engage the public have been abandoned demonstrated by, amongst other things, charging for documents. It is not right that St. Helens but not Warrington residents get reduced price copies of some documents.

What changes required?

Council view
Comments Noted
Justification

There have been several rounds of consultation and all documents were available on our website plus essential consultation documents were placed on deposit at various locations. Given the number and size of the documents, cumulative print costs are high and so we need to ensure that we manage our budget properly.

Change in Re-Publication Core Strategy
No Change
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Several mistakes have been made in summarising comments, in particular one of Mr Sargeant's comments were not summarised and the summary of CPRE’s comments was poor.
What changes required?

Council view
Comments Noted
Justification
We apologise for any mistakes and would appreciate the particular summaries to be pointed out to us for correction. The Inspector will receive full copies of the original representations.
Change in Re-Publication Core Strategy
No Change

Core Strategy Publication Draft

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>81816</td>
<td>CSPUB1862</td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
The deletion of previous policies causes confusion for those who have made comments and means that comments that relate to previous policies are "lost".
What changes required?

Council view
Comments Noted
Justification
Comments from the previous consultations have not been "lost". They were considered by the Council during the creation of the Publication version of the Core Strategy and changes were made when the Council agreed. The Council’s responses to the Representations are documented in the "Report of and Council’s Response to Representations on Core Strategy preferred Options“ (April 2009). We have explained in the Evolving The Core Strategy and individual background papers how we have generally taken account of representations. If people who submitted representations in previous consultations consider that the Publication Core Strategy does not address the issues they have raised previously they had the opportunity to comment on the Publication Core Strategy. The broad structure of the Publication Core Strategy was very similar to the Preferred Options document so it is possible to see how the policies have evolved.
Change in Re-Publication Core Strategy
No Change

*Reason for correction: Above representations accidentally omitted.*
**Core Strategy Publication Draft**

**Respondent** 364564 Ms Sam Turner Principal Planning Officer 4NW

**Representation** CSPUB1740

**Legally Compliant?** Yes **Sound?** Yes **Issue raised before?**

**If not, why not?**

**Any other comments?**

**Why considered unsound..**

It is considered that the Proposed Submission St Helens Core Strategy DPD is in general conformity with the adopted Regional Spatial Strategy for the North West of England, published September 2008. 4NW supports the DPD and its policies, which are in conformity with the adopted Regional Spatial Strategy and will support its implementation.

**What changes required?**

No change.

**Council view**

Comments Noted

**Justification**

Comments noted.

**Change in Re-Publication Core Strategy**

No change.

---

**Respondent** 82497 Mrs Joan Ward

**Representation** CSPUB1747

**Legally Compliant?** No **Sound?** No **Issue raised before?** No

**If not, why not?**

Only recently been made aware of E.U Directives

**Any other comments?**

Issues relate to E.U Directive 97/11/EC copies of the relevant sections are attached to the response form. 3 of 4 EIA Directive Legal Action IP_03_1070 and 4 of 4 EU Directive 31997L0011

**Why considered unsound?**

In summary - Issues raised relate to the Parkside SRFI and anywhere within the Core Strategy Publication document and subsequent Sustainability Appraisal and Habitat Regulation Assessment documents. The documents are considered as not legally compliant because St. Helens Council have not included an Environment Impact Assessment Report for public consultation as requested by EU Directive 97/11/EC.

Comments raised are also in relation to the Core Strategy Background Paper on Parkside relating to sections on the Motorway Service Area, Newton Park Farm and Appendix 1 RSS policy RT8. Comments raised relate to the need for an Environment Impact Assessment Report as required by EU Directive 97/11/EC.

Comments raised on Chapter 3 National Comtext raises the issue that a number of national documents reflect the need for freight rail terminals and as such should be aware of the need for an accompanying Environment Impact Assessment.
Policy CAS 3.1 and CAS 3.2 St. Helens Council need to receive an Environment Impact Assessment Report before they can change the UDP policy already in existence. The Core Strategy policies CSS1 through to CR2 all need to be assessed as to whether an Environment Impact Assessment will be required. All policy projects included within the Core Strategy should be subject to an Environment Impact Assessment report as required by EU Directive 97/11/EC.

What changes required?
All the Core Strategy policy projects shown in the DPD must show the following:
1. Whether or not each policy project is EU Directive Compliant
2. All EU Directives requiring an Environmental Impact Assessment Report must be published for public comment. In particular, the Parkside project requires an EU Directive 97/11/EC Environment Impact Assessment for public comment.

Council view
No change recommended

Justification
EU Directive 97/11/EC has been misinterpreted in the above representation, as this Directive is required only at the project level and not the plan making level. The 'Environmental Assessment' that the Directive refers to is in this instance related to the Strategic Environmental Assessment of which the Sustainability Appraisal is required for. An Environmental Impact Assessment would be needed to accompany a planning application, not a Core Strategy and thus the Core Strategy remains in conformity with European and National legislation.

Change in Re-Publication Core Strategy
No change.

Respondent 82498  Mr Richard Ward
Representation CSPUB1748

Legally Compliant? No  Sound? No  Issue raised before? No

If not, why not?
After consulting recently with a legal representative from another European member country, I was made aware of the importance of E.U Directives.

Any other comments?
Especially when shown the EU Directive 97/11/EC see attached comments

Why considered unsound?
Because the DPD is presented as St. Helens Core Strategy all policy projects mentioned are not shown to be tested with the E.U Directives pertaining to this DPD document. In particular, Article 2 of E.U. Directive 97/11/EC, an Environment Impact Assessment Report has not been shown to have been applied to the Parkside project at any stage.

What changes required?
All the Core Strategy policy projects shown in the DPD must show the following:
1. Whether or not each policy project is E.U Directive compliant

Council view
No change recommended
Justification
EU Directive 97/11/EC has been misinterpreted in the above representation, as this Directive is required only at the project level and not the plan making level. The "environmental assessment" referred to is an SEA, not an EIA, which is where the misinterpretation may have occurred. The EIA and SEA processes are entirely separate. A strategic "plan" may include policies or references relating to individual development projects but such policies or references are still strategic in nature and do not include full detail on development proposals and do not automatically grant consent to those projects. Therefore, an EIA is neither required nor appropriate for a "plan" such as a Core Spatial Strategy.

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>Core Strategy Publication Draft</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
</tr>
<tr>
<td>Mr Kieran Preston</td>
</tr>
<tr>
<td>Planning and Conservation Adviser Natural England</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Any other comments?
Natural England welcomes this opportunity to comment on the submission Core Strategy for St Helens. This is an important document for providing the strategy for developing the Borough to 2025. We wish to commend the Council on the production of a well presented strategy, that for Natural England provides a future strategy to guide development whilst conserving and enhancing the natural environment; and people’s enjoyment and access to it. We particularly welcome the important role that green infrastructure has played in the wording of many of the spatial and topic based detailed policies.

Why considered unsound?

What changes required?

Council view
Comments Noted

Justification
No change.

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ms Diane Clarke</td>
<td>CSPUB1743</td>
</tr>
<tr>
<td>Town Planning Technician Network Rail</td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised
Any other comments?
The comments raised from Network Rail relate to the consultation process and how they had failed to be adequately consulted with during the publication consultation period. Network Rail were contacted on the 2nd July and the consultation ended on the 8th July. Network Rail have requested to be properly consulted at the alternative options stage in the future. However, this was as a result of St. Helens Council using a wrong address for Network Rail and as a result gave Network Rail a further six weeks to consult upon the document after the original consultation deadline in order for them to raise any relevant issues. No further comment was received from Network Rail.

Why considered unsound?
N/A

What changes required?
N/A

Council view
Comments Noted

Justification
Network Rail were given an additional 3 weeks to comment but no comments were received.

Change in Re-Publication Core Strategy
No change.
Chapter 1 – Introduction

1 Introduction

Respondent 315762 Mrs Dianne Wheatley Spatial Development Manager Government Office for the North West

Representation CSPUB246

Legally Compliant? No Sound? Yes, with minor changes Issue raised before? No

If not, why not?
We made a general comment at preferred options stage stating that the Council should seek its own legal advice on whether it has met procedural requirements.

Any other comments?

Why considered unsound?
The document does not include a list of saved policies from the St Helens Unitary Development Plan which the Core Strategy will replace/supersede. This needs to be included to comply with the legal compliance test and Regulation 13(5) of the Town and Country Planning (Local Development)(England) Regulations 2004.

What changes required?
Include a list of policies from the St Helens UDP which the Core strategy will supersede.

Council view
Agree Recommend Change

Justification
The omission of this requirement was an oversight and the need for it is acknowledged.

Change in Re-Publication Core Strategy
Include new appendix in Core Strategy summarising which UDP policies are to be replaced.

1 Introduction

Respondent 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation CSPUB684

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes

If not, why not?

Any other comments?
We note that there is no mention of the Waste Development Plan Document in the Introduction as the Core Strategy should provide context for the Waste DPD. Also, the Waste DPD will assist in implementation of the Core Strategy and forms part of the St Helens LDF.

Why considered unsound?

What changes required?
Council view
Agree Recommend Change

Justification
Please also see response to representation CSPUB701. Whilst table 1.2 is not an exhaustive list of the documents that form the context of the Core Strategy or that make up the Local Development Framework, no objection is raised to including the Waste DPD within this table.

Change in Re-Publication Core Strategy
Add ‘Waste DPD’ into table 1.2 after “Climate Change DPD’ and before “Area Action Plans’. Include supporting text “Which will provide policy guidance standards for waste management and allocate sites for waste purposes’.

1.2 Paragraph

<table>
<thead>
<tr>
<th>Respondent Representation</th>
<th>Mr Alex Naughton Policy Officer Merseytravel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Any other comments?
Merseytravel (Merseyside ITA/PTE) welcomes this opportunity to engage positively with St Helens Council on the LDF Core Strategy, which once adopted, will form a key Local Development Document (LDD) as part of the LDF. We wish to reiterate our comments dated 14 December 2007 made in response to the Preferred Options stage of the Core Strategy. This organisation considers that the development of the Core Strategy and other spatial and land use development plan documents as part of the Local Development Framework create a key opportunity for policy intervention to closely integrate land use and transport planning, promote the creation of sustainable communities, take into account the need to tackle climate change and make best use of St Helens’ strategic assets. Merseytravel believes that the strategic direction set by the LDF Core Strategy should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion, and help tackle climate change. The Core Strategy and Local Development Framework documents should be fully interlinked with the LTP2 and provide for the integration of land use and transport planning. For example location of development in accessible locations, use of Accession software to assist with this, developments based around the need for access by all forms of transport, management of parking in new development, expectation that developers should contribute to cost of public transport access in areas that are not well served by existing public transport services. The LDF Core Strategy and LDF needs to ensure that policies within the LDF documents do not conflict thus ensuring a coherent and integrated approach relating to the development of sustainable land use and transport planning outcomes. We welcome the references made to the Local Transport Plan.

Why considered unsound?

What changes required?

Council view
No change recommended
Justification
The Council agrees that the LDF and LTP should be closely linked, and indeed the teams responsible for planning policy and transport policy are co-located, within the same department, share information and liaise closely. There are also plans to use traffic modelling software to test any sites allocated in the Allocations DPD.

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>1.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>82491</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB701</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
</tbody>
</table>

Any other comments?
The Waste DPD is part of the suite of documents forming St Helens LDF; we suggest that the Waste DPD is included in the table under section 1.2 with the following wording “which will provide policy guidance and site allocations for new waste management development and, to ensure waste issues are incorporated into all new development.

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
Partially agree. The list at 1.2 is not intended to be exhaustive, however do not object to adding Waste DPD.

Change in Re-Publication Core Strategy
Add Waste DPD to list at 1.2 after “Climate Change DPD’ and before “Area Action Plans'. Supporting text Which will provide policy guidance standards for waste management and allocate sites for waste purposes

<table>
<thead>
<tr>
<th>1.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>82491</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB708</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
</tbody>
</table>
Any other comments?
We note that Section 1.2 now includes text on the Climate Change DPD, which is good. However, we consider that the description would benefit from some elaboration so that it is clear that it is intended to cover adaptation as well as mitigation. Thus something like "...minimises impact on climate change and is well adapted for climate change that is unavoidable."

Why considered unsound?

What changes required?

Council view
Agree Recommend Change

Justification
Agree with the recommended change as it is important to recognise that climate change has already happened and that adaptation is necessary.

Change in Re-Publication Core Strategy
Add in the words after 'minimises impact on climate change' ... 'and is well adapted for climate change that is unavoidable'.

<table>
<thead>
<tr>
<th>1.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB710</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
We suggest that the Infrastructure DPD should be included in the table under section 1.2.

Why considered unsound?

What changes required?

Council view
No Change Recommended

Justification
An Infrastructure DPD is not planned.

Change in Re-Publication Core Strategy
No change recommended.

<table>
<thead>
<tr>
<th>1.11</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81648</td>
</tr>
</tbody>
</table>
Representation CSPUB1753

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes, with minor changes</td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?
The issue has only recently been included following the production of the SFRA.

Any other comments?

Why considered unsound?
The main report states 'It is not expected that climate change could increase the flood risk in the long term'. This is contrary to PPS25 which predicts increases in both rainfall intensity and sea level due to the effects of climate change.

What changes required?
The sentence should be re-worded to read 'It is expected that climate change will increase the flood risk in the long term'.

Council view
 Agree Recommend Change Comment noted

Justification
Include within addendum of the SA Report reviewed and addendum prepared, therefore original text not revised.

Change in Re-Publication Core Strategy
Addendum will be included within the SA report to highlight this alteration. No change recommended.

Reason for correction: SA Report reviewed and addendum prepared, but SA not updated, therefore original text not revised.

1.11 Paragraph

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Environment Agency (NW Regional Office)</th>
</tr>
</thead>
<tbody>
<tr>
<td>81648</td>
<td>CSPUB1754</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes, with minor changes</td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?
Data increasingly out of date

Any other comments?

Why considered unsound?
This comment is specific to the Sustainability Appraisal document paragraphs 3.3.30 - 3.3.31. The picture painted is out of date in terms of water quality. The statements referring to significant declines in water quality are misleading.

What changes required?
Since 2005 there have been significant water quality improvements due to various schemes and major improvements to the discharge from St. Helens STW. Up to date data should be utilised.
Council view
Agree Recommend Change Comment noted

Justification
Agree that more current data is now available which has been included within the latest draft SA Scoping Report 2009 which updates the sustainability baseline. Addendum will be included within the SA report to highlight this alteration. SA Report reviewed and addendum prepared, therefore original text not revised.

Change in Re-Publication Core Strategy
Addendum will be included within the SA report to highlight this alteration. No change recommended.

Reason for correction: SA Report reviewed and addendum prepared, but SA not updated, therefore original text not revised.

<table>
<thead>
<tr>
<th>1.11</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82497</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1749</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes
Sound? No
Issue raised before? No

If not, why not?
Only recently been made aware of E.U Directives
Any other comments?

Why considered unsound?
In summary - this comment relates specifically to the Sustainability Appraisal document yet is logged under paragraph 1.11 as this relates to Sustainability Appraisals. The SA Objectives 1 - 17 as shown on page 56/57, table 11 of the Core Startegy main report. Need to be amended with a SA objective 'E.U Directive', '97/11/EC Annex 1 or 2' or 'not required'. If the EU Directive or EIA is or is not required then the DPD must show it.

What changes required?
The SA Objectives 1 - 17 as shown on page 56/57, table 11 of the Core Startegy main report. Need to be amended with a SA objective 'E.U Directive', '97/11/EC Annex 1 or 2' or 'not required'. If the EU Directive or EIA is or is not required then the DPD must show it.

Council view
Comments Noted

Justification
This representation is made on the basis of a misinterpretation of EU Directive 97/11/EC. The "environmental assessment" referred to is an SEA, not an EIA, which is where the misinterpretation may have occurred and as a result the Sustainability Appraisal of the Core Strategy is not the correct mechanism through which to discuss the need for EIA. The EIA and SEA processes are entirely separate. A strategic "plan" may include policies or references relating to individual development projects but such policies or references are still strategic in nature and do not include full detail on development proposals and do not automatically grant consent to those projects. Therefore, an EIA is neither required nor appropriate for a "plan" such as a Core Spatial Strategy.

Change in Re-Publication Core Strategy
No change.

1.11 Paragraph

Respondent: 82498 Mr Richard Ward
Representation: CSPUB1751

Legally Compliant? No Sound? No Issue raised before? No

If not, why not?
After consulting recently with a legal representative from another European member country, I was made aware of the importance of E.U Directives.

Any other comments?

Why considered unsound?
Please note these comments relate to the Sustainability Appraisal document, however they have been attached to the paragraph relating to Sustainability Appraisal. No specific comments were raised regarding SA’s, however the box was ticked on the form to indicate that general comments made were also relevant to the SA report. In summary, any policy projects referred to in the Core Strategy, Sustainability Appraisal and Habitat Regulations Assessment are subject to Environment Impact Assessments as required by E.U Directive 97/11/EC.

What changes required?

Council view
Comments Noted

Justification
This representation is made on the basis of a misinterpretation of EU Directive 97/11/EC. The "environmental assessment" referred to is an SEA, not an EIA, which is where the misinterpretation may have occurred and as a result the Sustainability Appraisal of the Core Strategy is not the correct mechanism through which to discuss the need for EIA. The EIA and SEA processes are entirely separate. A strategic "plan" may include policies or references relating to individual development projects but such policies or references are still strategic in nature and do not include full detail on development proposals and do not automatically grant consent to those projects. Therefore, an EIA is neither required nor appropriate for a "plan" such as a Core Spatial Strategy.

Change in Re-Publication Core Strategy
No change.

1.12 Paragraph

Respondent: 315747 Mr Kieran Preston Planning and Conservation Adviser Natural England
Representation: CSPUB738

Legally Compliant? Yes Sound? Yes Issue raised before? No

If not, why not?
N/A

Any other comments?
Natural England has no further comments to make on the SA/SEA.
Why considered unsound?

What changes required?

Council view
Comments noted

Justification
Comments noted

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>1.17</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315747</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB529</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Please include River Dee and Bala Lake SAC and The Dee Estuary SAC, SPA and Ramsar Site in the list of sites. These were missing from the previous HRA Report, but we note that they have now been included in the final report.

Why considered unsound?

What changes required?

Council view
No Change Recommended

Justification
These additional sites were included within the HRA that was out for consultation in summer 2009 as a result it is felt they should be added to the list of sites detailed within paragraph 1.17.

Change in Re-Publication Core Strategy
Include additional bullet points at paragraph 1.17:
River Dee and Bala Lake SAC
The Dee Estuary SAC, SPA and Ramsar

<table>
<thead>
<tr>
<th>1.17</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB692</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? Yes

If not, why not?

Any other comments?
Paragraphs 1.17 and 1.18 would benefit from revision to make them easier to understand. We suggest the following revised wording: "The Council has undertaken an Appropriate Assessment of the St. Helens Core Strategy in accordance with the requirements of the Habitats Regulations, which protect sites of European importance for nature conservation. The purpose of the Appropriate Assessment was to assess the potential impacts of the Core Strategy against the objectives for conserving European designated sites. There are no European designated sites within the Borough of St. Helens, but there are some designated sites in surrounding areas which were included in the assessment. These are: Liverpool Bay pSPA/pRAMSAR Site Manchester Mosses SAC Martin Mere SPA/Ramsar Site Mersey Estuary SPA/Ramsar Site Mersey Narrows & North Wirral Foreshore pSPA/pRAMSAR Site Ribble and Alt Estuaries SPA/Ramsar Site Rixon Clay Pits SAC Sefton Coast SAC
Appropriate Assessment of the Core Strategy was first undertaken at the Preferred Options stage. At that time, the assessment concluded that the Core Strategy Preferred Options had the potential to result in significant adverse effects on European sites in relation to water quality/sedimentation and recreational pressure on estuarine/marine sites. This version of the Core Strategy therefore includes a number of amendments and commitments, including partnership working with Merseyside authorities and the creation of a new post at Merseyside Environmental Advisory Service to assess and implement mitigation for the potential impacts of the Core Strategy. The amended Core Strategy was re-assessed in March 2009. The assessment concluded that the Core Strategy in combination with the commitments above contained an appropriate policy framework for the avoidance and mitigation of adverse effects on European Sites.

Why considered unsound?

What changes required?

Council view
No change recommended

Justification
No change recommended as it is felt that omitting any of the paragraphs from this section will detract from the explanation detailed.

Change in Re-Publication Core Strategy
No change

1.17  Paragraph

Respondent  Representation 82497  CSPUB1750  Mrs Joan Ward

Legally Compliant? No  Sound? No  Issue raised before? No

If not, why not?
Only recently been made aware of E.U Directives

Any other comments?
Why considered unsound?
In summary - no specific comments were raised in relation to the Habitat Regulations Assessment, however, the box was ticked that states all comments also relate to the Habitat Regulations Assessment document. In short, any reference to policy projects within the HRA should have been subject to an Environment Impact Assessment as per E.U Directive 97/11/EC.

What changes required?

Council view
Comments Noted

Justification
EU Directive 97/11/EC is not required when producing a Habitat Regulations Assessment for a Strategic plan such as the Core Strategy.

Change in Re-Publication Core Strategy
No change.

1.17 Paragraph

Respondent 82498 Mr Richard Ward
Representation CSPUB1752

Legally Compliant? No Sound? No

If not, why not?
After consulting recently with a legal representative from another European member country, I was made aware of the importance of E.U Directives.

Any other comments?

Why considered unsound?
Please note these comments relate to the Habitat Regulations Assessment document, however they have been attached to the paragraph relating to Habitat Regulation Assessments. No specific comments were raised regarding Habitat Regulations Assessments, however the box was ticked on the form to indicate that general comments made were also relevant to the HRA. In summary, any policy projects referred to in the Core Strategy, Sustainability Appraisal and Habitat Regulations Assessment are subject to Environment Impact Assessments as required by E.U Directive 97/11/EC.

What changes required?

Council view
Comments Noted

Justification
EU Directive 97/11/EC is not required when producing a Habitat Regulations Assessment for a Strategic plan such as the Core Strategy.

Change in Re-Publication Core Strategy
No change.

1.18 Paragraph
Any other comments?
We are satisfied with the HRA Report for the Core Strategy Submission Document, and concur with the conclusion of no likely significant effect, subject to the mitigation measures as proposed in the report. We particularly welcome the consideration of the River Dee and Bala Lake, and the Dee Estuary as additional European sites, specifically in respect of water resource management.

Why considered unsound?

What changes required?

Council view
Comments noted

Justification
We welcome the continued advice and support from Natural England.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>1.18</th>
<th>Paragraph</th>
</tr>
</thead>
</table>

**Respondent**
82491  Miss Lesley Bye  Contaminated Land Team Leader  Merseyside Environmental Advisory Service

**Representation**
CSPUB695

**Legally Compliant?**  Yes  **Sound?**  Yes  **Issue raised before?**  Yes  **If not, why not?**  

**Any other comments?**
Paragraphs 1.17 and 1.18 would benefit from revision to make them easier to understand. We suggest the following revised wording: “The Council has undertaken an Appropriate Assessment of the St. Helens Core Strategy in accordance with the requirements of the Habitats Regulations, which protect sites of European importance for nature conservation. The purpose of the Appropriate Assessment was to assess the potential impacts of the Core Strategy against the objectives for conserving European designated sites. There are no European designated sites within the Borough of St. Helens, but there are some designated sites in surrounding areas which were included in the assessment. These are: Liverpool Bay pSPA/pRAMSAR Site Manchester Mosses SAC Martin Mere SPA/Ramsar Site Mersey Estuary SPA/Ramsar Site Mersey Narrows & North Wirral Foreshore pSPA/pRAMSAR Site Ribble and Alt Estuaries SPA/Ramsar Site Rixton Clay Pits SAC Sefton Coast SAC Appropriate Assessment of the Core Strategy was first undertaken at the Preferred Options stage. At that time, the assessment concluded that the Core Strategy Preferred Options had the potential to result in significant adverse effects on European sites in relation to water quality/sedimentation and recreational pressure on estuarine/marine sites. This version of the Core Strategy therefore includes a number of amendments and commitments, including partnership working with Merseyside authorities and the creation of a new post at Merseyside Environmental Advisory Service to assess and implement mitigation for the potential impacts of the Core Strategy. The amended Core Strategy was re-assessed in March 2009. The assessment concluded that the Core Strategy in combination with the commitments above contained an appropriate policy framework for the avoidance and mitigation of adverse effects on European Sites.

Why considered unsound?

What changes required?

Council view
No change recommended

Justification
Agree recommended change to make the paragraphs relating to the AA/HRA easier to understand. No change recommended as it is felt that omitting any of the paragraphs from this section will detract from the explanation detailed.

Change in Re-Publication Core Strategy
Delete paragraphs 1.17 and 1.18 and replace with modified text. Insert new paragraph as follows: “The Council has undertaken an Appropriate Assessment of the St. Helens Core Strategy in accordance with the requirements of the Habitats Regulations, which protect sites of European importance for nature conservation. The purpose of the Appropriate Assessment was to assess the potential impacts of the Core Strategy against the objectives for conserving European designated sites. There are no European designated sites within the Borough of St. Helens, but there are some designated sites in surrounding areas which were included in the assessment. These are: Liverpool Bay pSPA/pRAMSAR Site Manchester Mosses SAC Martin Mere SPA/Ramsar Site Mersey Estuary SPA/Ramsar Site Mersey Narrows & North Wirral Foreshore pSPA/pRAMSAR Site Ribble and Alt Estuaries SPA/Ramsar Site Rixton Clay Pits SAC Sefton Coast SAC River Dee and Bala Lake SAC The Dee Estuary SAC SPA RAMSAR. Appropriate Assessment of the Core Strategy was first undertaken at the Preferred Options stage. At that time, the assessment concluded that the Core Strategy Preferred Options had the potential to result in significant adverse effects on European sites in relation to water quality/sedimentation and recreational pressure on estuarine/marine sites. No Change

Reason for correction: The above amendment was included as an errata slip to the printed version following reconsideration of the impact of the changes.
1.34 Paragraph

Respondent 81816 Mr P Sargeant
Representation CSPUB1867
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?

Why considered unsound?
Paragraph 1.34 states that the motorway system bordering St Helens is not under stress yet this contradicts what the Highways Agency told the Regional Spatial Strategy Examination in Public Panel

What changes required?

Council view
No Change Recommended
Justification
The Highways Agency do not state in their representations that the motorway system bordering St. Helens is under stress.
Change in Re-Publication Core Strategy
No Change

Reason for correction: Representation accidentally missed.

1.36 Paragraph

Respondent 315762 Mrs Dianne Wheatley Spatial Development Manager Government Office for the North west

Legally Compliant? Yes Sound? Yes Issue raised before? No

If not, why not?
N/A

Any other comments?
Minor textual comment

Why considered unsound?
Include date for diagram as may be subject to change in future

What changes required?
Include date for diagram

Council view
Agree Recommend Change

Justification
Agree that the inclusion of the date will add further clarity

Change in Re-Publication Core Strategy
2009 added to diagram at 1.36.

Chapter 2 – Context
### 2.14 Paragraph

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82491</th>
<th>Miss Lesley Bye</th>
<th>Contaminated Land Team Leader</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Merseyside Environmental Advisory Service</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB714</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td>Given that the Joint Waste DPD is a cross boundary sub-regional issue, it is surprising there is no bullet here.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Why considered unsound?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes required?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Council view</td>
<td>No Change Recommended</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Justification</td>
<td>Waste DPD is subservient to Core Strategy therefore it would not be appropriate to mention it here.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in Re-Publication Core Strategy</td>
<td>No change.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 2.18 Paragraph

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
<th>Spatial Development Manager Government Office for the North west</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB248</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td>Issue didn't arise at earlier official stages on which we commented.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Why considered unsound?</td>
<td>This relates to the soundness test of being justified.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes required?</td>
<td>Explain why the implications of the Growth Point proposals have not been consulted upon until now, and their implications.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Council view
Agree Recommend Change

Justification
Agree that further explanation here would be appropriate and would add clarity.

Change in Re-Publication Core Strategy

Add paragraph 2.18(a) As Growth Point was awarded following consultation on the Preferred Options report, Publication was the first opportunity that stakeholders and public had to comment on its implications. It was considered that a further round of consultation was unnecessary as the Core Strategy did not require significant change to accommodate Growth Point. No spatial changes are proposed to facilitate its implementation, merely an acceleration of existing planned provision. There is no single site or priority area for the delivery of housing in St Helens through Growth Point. The key opportunities for delivery are the three urban villages at Moss Nook, former Vulcan Works and Lea Green Colliery, and there are opportunities to subsidise the commencement of development on sites with existing planning permissions that are yet to start.
Chapter 3 – Issues, Problems and Challenges

<table>
<thead>
<tr>
<th>3</th>
<th>Issues, Problems and Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB718</td>
</tr>
</tbody>
</table>

Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? | Yes |

Any other comments?
This chapter should include a statement that the number of Local Wildlife Sites currently in active (positive) conservation management stands at approximately 10%. In order to deliver the Vision for a quality environment, the number of sites in active (positive) conservation management must be increased.

Why considered unsound?

What changes required?

Council view
Agree Recommend Change

Justification
Agree that the chapter focusses upon key issues and challenges for traditional land uses and at present lacks focus upon environmental issues and challenges. As such agree to include a sentence within paragraph 3.13 on the issue of conservation management and monitoring.

Change in Re-Publication Core Strategy
‘Much of this is now developing as woodland and a major opportunity exists to improve accessibility to it. Condition monitoring remains a key priority with currently 10% of Local Wildlife Sites in positive conservation management, which needs to be continued and enhanced where practical’.

<table>
<thead>
<tr>
<th>3.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>303551 Mr Alex Naughton Policy Officer Merseytravel</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB3</td>
</tr>
</tbody>
</table>

Legally Compliant? | Yes | Sound? | Yes | Issue raised before? | Yes |

Any other comments?
Buses in terms of their network routes and capacity are generally more flexible than trains; however this comes at a cost. Each extra vehicle in the network costs around £100,000 plus per year, every mile costs about £3.50. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes, detail design issues to make it easy to route bus services directly through development and finally high quality design is important. We recommend that St Helens Council should refer to existing
best practice and the Institution of Highways & Transportation (IHT) “Guidelines for Planning for Public Transport in Developments” that was published in 1999. See below for the website link: http://www.iht.org.uk/publications/technical/publictransport.asp

We are also aware that there are capacity issues on the City Line out of Liverpool Lime Street which passes through St Helens. These issues are partly related to insufficient rolling stock being available to strengthen train services.

However there is also the issue of the Manchester Hub which is a major bottleneck on the rail network. Merseytravel is working with key partners and stakeholders to identify cost effective and value for money solutions to address the capacity issues in the Manchester area.

There are also aspirations to electrify the lines between Liverpool and Manchester, especially the Chat Moss route, for which some initial technical work has been undertaken. This is one of the routes being considered for electrification as part of Network Rail’s draft Network RUS Electrification Strategy which was published in May 2009.

However the Manchester Hub does affect rail services in and out of Liverpool Lime Street and constrains capacity and frequencies on routes from Liverpool to Manchester and Manchester Airport as well as longer distance routes from Liverpool to Yorkshire and the East Midlands. These issues are also highlighted in the North West RUS by Network Rail.

Merseytravel is also supportive of the investigation by Government of a TGV style high-speed rail network in the UK to follow on from the completion of High Speed 1. Merseytravel and its partners will work with Government and other stakeholders to make best use of opportunities presented by future development of such a rail network in the UK for intercity services to and from Liverpool city centre and for the local and regional rail network.

As you may be aware Merseytravel and the LTP Partners have produced a Merseyside Rail Strategy (2006-2011) outlining our plans and aspirations for the rail network in Merseyside. The Rail Strategy states the following:

“It (Merseytravel) will also explore options for enhancing links between the North West’s City Regions and neighbouring regions. Merseytravel will identify the circumstances in which additional train services may be required on the City Line along with any associated network enhancements.”

The Rail Strategy also states that:

“St Helens Central to St Helens Junction Curve Reinstatement. To support enhanced links between St Helens, Liverpool and Manchester, technical work is underway to identify options for the reinstatement of this line and to assess their feasibility. Findings are anticipated later in 2006. If value for money options are identified, Merseytravel will take these towards implementation.”

The St Helens Rail Link Report was published in May 2006. This concluded that there was insufficient business case to justify the curve’s reinstatement at the present time but it should be safeguarded and protected to keep future options open. As a result the aspiration has been progressed no further. Subsequently the North West Route Utilisation Strategy was published by Network Rail in May 2007 and this makes no mention of the St Helens Curve. Nevertheless we feel that the St Helens Central to St Helens Junction rail alignment may be of relevance for future public transport (including passenger rail use), walking and cycling purposes. Indeed it is still maintained as an active alignment by Network Rail. We request that St Helens Council work to ensure that this rail alignment is safeguarded and protected for future public transport (including passenger rail use), walking and cycling purposes in order to retain future options. As a result we support the safeguarding of the St Helens Central to St Helens Junction rail line for public transport purposes, walking and cycling mentioned in Policy CAS1.

We also wish to see space for a new Carr Mill rail station safeguarded and protected to retain future options so that if necessary it can be implemented in the future subject to feasibility,
business case and availability of funding. We note reference to Carr Mill new rail station in paragraph 1.32. While it is in LTP2, Merseytravel have given no commitment to delivering it by a certain date as its implementation and delivery is dependent on a number of factors such as feasibility, business case, funding and liaison with train operators.

It should be noted that the finalised Merseyside Route Utilisation Strategy (RUS) published in March 2009 by Network Rail mentions the potential for a new rail link from Rainford Junction on the Kirkby to Wigan line to Skelmersdale in the long term. A triangle arrangement at Rainford could enable Skelmersdale to be served by trains from the Liverpool / Kirkby and Wigan / Manchester directions for example, while still allowing freight trains to access directly the Kirkby Rail Freight Terminal. This possibility should be borne in mind by the Core Strategy and space for a triangle alignment safeguarded and retained near Rainford as well as an alignment for the rail line north towards Skelmersdale itself in order to keep open future options.

Merseytravel expect the Core Strategy and Local Development Framework to adopt and implement the Transport SPD that has been prepared jointly by the Merseyside partners.

Merseytravel would expect formal consultation on development around all medium and major transport nodes and interchanges.

Housing is just one element of many that go towards creating sustainable communities; it is not the only or most important element. All the various elements are of equal importance e.g. health, education, shops, community facilities etc. It must be realised that 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. We understand that there is considerable pressure at the moment for land and land in public ownership to be released for housing development. We are concerned that land with transport potential e.g. former station goods yards, site for interchange at Newton le Willows station, etc is often released for housing thus causing opportunities for transport improvements in the longer term to be lost due to the short-term gain that is offered by releasing such sites for housing. We feel that mechanisms should be put in place to ensure that this doesn’t happen where land has transport potential. We would welcome discussion with the Council before land is released to clarify its transport potential.

Why considered unsound?

What changes required?

Council view
Comments noted

Justification
Regarding locating development to take advantage of existing transport infrastructure such as bus networks, this is covered by policy CP2 and the Ensuring Choice of Travel SPD. The Council is aware of the capacity issues on the City line.

The Council welcomes the support for the Core Strategy’s approach of safeguarding of the St Helens Central to St Helens Junction rail line for public transport purposes.

The Council notes that there is no set date for implementing a new station at Carr Mill however it is still prudent to safeguard the land for the provision of a station in the future. No alignment has been identified or funding identified for implementing a link to Skelmersdale in the Local Transport Plan. However, should this occur, the Core Strategy supports implementing Local Transport Plan priorities through part 6 of policy CP2, Creating An Accessible St.Helens, which states that development will support LTP priorities, and the Allocations DPD could be used to allocate the land. St. Helens Council intend to adopt an Ensuring a Choice Of Travel SPD which is based on but will be slightly different to the Merseyside SPD.
Merseytravel will be consulted where appropriate on development that affects infrastructure they operate

The Core Strategy safeguards land that has potential for transport uses. Furthermore, if land with transport potential is identified through the LTP, the Core Strategy supports implementing Local Transport Plan priorities through part 6 of policy CP2, Creating An Accessible St. Helens. Furthermore the Allocations DPD could be used to allocate the land.

**Change in Re-Publication Core Strategy**

No change
Chapter 4 – St. Helens in 2025

4 St. Helens in 2025

Respondent 81474 Councillor B Spencer
Representation CSPUB1731

Legally Compliant? Sound? Issue raised before?
If not, why not?

Any other comments?

I would wish to make the following amendments to the Strategy: The proposed Strategic Rail Freight Interchange at Parkside should not be referenced to without making clear it is only a proposal that at this stage does not have planning permission. This is also the case in para. 4.11, this will only be the case if planning permission is granted.

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
It is agreed that the current status of Parkside should be acknowledged,

Change in Re-Publication Core Strategy
Agree to provide a footnote to Vision explaining the current position with regards to Parkside:
"The implementation of Parkside is dependent on a suitable scheme gaining planning permission."

4 St. Helens in 2025

Respondent 364564 Ms Sam Turner Principal Planning Officer 4NW
Representation CSPUB1741

Legally Compliant? Sound? Issue raised before?
Yes Yes, with minor changes
If not, why not?

Any other comments?

Why considered unsound..
(Summarised) Climate change is referred to in the strategic objectives, and the spatial and environmental policies conform to the approach to climate change in RSS. However references to climate change are scattered throughout the document. As climate change is a key issue both in the RSS and nationally, it would be useful to add in a brief but overarching statement in the supporting text, which draws together these scattered references. This would in effect summarise the Council's strategy for climate change.

What changes required?
Such a statement could potentially include: * The strategic objective itself; * Indicate which
policies support this. CP1 and CQL1 are already listed, however other policies will play a part, for example, CSS1, CP2 and CH1; * Indicate what role St.Helens will play in implementing RSS policy EM17 on renewable energy and its targets. If this role has yet to be defined, for example, awaiting the development of a sub regional renewable energy evidence base, and/or the climate change DPD, this should be made clear; * Summarise what the role of the proposed climate change DPD will be.

**Council view**
Partly Agree Recommend Change

**Justification**
It is acknowledged that there are references to climate change throughout the Core Strategy. However, to ensure that the formatting of the document is kept consistent and concise, it would not be appropriate to expand on approach to climate change in Chapter 4. Agree that strategic objective SO2.2 for climate change is supported by Policies CSS1, CP2 and CH1, in addition to CP1 and CQL1. However, the table of strategic objectives only lists primary policies of delivery. It is maintained that Policies CP2 and CH1 provide secondary support for the climate change objective and therefore do not require listing in the table. Instead, it is felt that Policy CP1 would be a more appropriate location of the document to expand upon the position towards climate change and the role of the Climate Change DPD.

**Change in Re-Publication Core Strategy**
No change to Chapter 4. Insert paragraph 12.3A in supporting text to Policy CP1 to expand upon the Council's position towards climate change and the role of the Climate Change DPD:

> "The importance of tackling climate change is highlighted by the Key Planning Objectives set out in the Planning and Climate Change supplement to Planning Policy Statement 1. Accordingly, section 4 of policy CP1 is an important tool for tackling climate change in St. Helens due to its requirements such as waste minimisation, renewable energy and setting minimum Code for Sustainable Homes and BREEAM standards. The Climate Change DPD will set out policies to help new development reduce its contribution to the causes of climate change and cope with the effects of climate change."

### 4.2 Paragraph

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82550</th>
<th>Mr Steven Broomhead</th>
<th>Chief Executive Northwest Regional Development Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1775</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
</tbody>
</table>

If not, why not?
Our comments relate to detailed policy wording which was not available at earlier stages.

**Any other comments?**
The Agency welcomes the inclusion of the reference to the strategic rail freight interchange at Parkside within the spatial vision. This satisfactorily reflects our comments at the Preferred Options stage.

**Why considered unsound..**

**What changes required?**

**Council view**
Comments Noted

**Justification**
Change in Re-Publication Core Strategy
No change recommended.

4.4

<table>
<thead>
<tr>
<th>Respondent</th>
<th>303551</th>
<th>Mr Alex Naughton</th>
<th>Policy Officer Merseytravel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes  Issue raised before? Yes

If not, why not?

Any other comments?

With respect to chapter 4 “St Helens in 2025” we feel that specification of timescales for the vision and aspirations in this way is concerning as this may cause difficulties if developments are delayed by funding constraints etc. This perhaps raises expectations too much so people expect delivery of these aspirations. We feel that a more generic vision would be more appropriate rather than a detailed description of what will be in place by a certain date.

Why considered unsound..

What changes required?

Council view
No change recommended

Justification
Whilst it is understood that the Core Strategy should avoid raising expectations unnecessarily, it is useful to give illustrative examples of what the Core Strategy intends to help achieve, based on current best information, as this helps people understand the proposed outcome of the Core Strategy.

Change in Re-Publication Core Strategy
No change

4.31

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82550</th>
<th>Mr Steven Broomhead</th>
<th>Chief Executive Northwest Regional Development Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1776</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? No

If not, why not?

Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?

At the Preferred Options stage the Agency suggested that the strategic objectives should include securing the delivery of a strategic rail freight interchange at Parkside. Whilst there is still no explicit referenc to Parkside in the strategic objectives, we are pleased to note that the draft policy for Parkside (CAS 3) is identified as a primary delivery policy in respect of Strategic Objective 5.1.

Why considered unsound..

What changes required?
Council view
Comments Noted

Justification
Parkside is reflected in the vision.

Change in Re-Publication Core Strategy
No change recommended.
Chapter 5 – The Key Diagram

No representations made on the Key Diagram
### Chapter 6 – Overall Spatial Strategy

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>Mrs Dianne Wheatley</td>
</tr>
<tr>
<td>315762</td>
<td>Spatial Development Manager Government Office for the North west</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB252</td>
</tr>
</tbody>
</table>

| Legally Compliant? | Yes | Sound? | No | Issue raised before? | Yes |

**Why considered unsound?**

We have concerns about the way that these policies are currently written, in relation to clarity about what is proposed and their justification for it: (i) clarification is needed on what St Helens are proposing here “are you removing the 54.02ha site from the Green Belt as shown on the diagram- it is not clear? The text at CSS1(viii) and the third paragraph of policy CAS3.2 seem to imply that land will be removed from the Green Belt at some point in the future once a scheme has been approved. The last paragraph of the reasoned justification states that if no scheme comes forward alternatives will be assessed in the context of the Green Belt designation, as though it is remaining in the Green Belt. However, PPG2 paragraphs 2.6-2.10 make it clear that Green Belt boundaries and revisions to them should be made through the plan making process, and that they should be made to endure. If a scheme is justified by very special circumstances, any Green Belt Review would be in a future Plan Review. The Core Strategy needs to clarify this issue. (ii) even if land is being removed from the Green Belt, the scale is not clear. The Previously Developed Land 54.02ha is referred to at one point, but paragraph 9.21 states that an unidentified enlarged area would be needed; paragraph 9.39 refers to a 272ha planning application, and the Background Paper “Parkside Rail Freight Interchange” paragraph 2.4 refers to it being a strategic location for an SRFI with a size range of 40-400ha. Paragraph 6.12 of the paper also states that the scale and form of any terminal are yet to be decided and would be influenced by the level of development required to fund the associated infrastructure. The Plan needs to set out the scale of the proposal envisaged and set this out within the Core Strategy with justification. (iii) in relation to the exceptional circumstances (PPG2 paragraph 2.7) to justify the proposal if the land is being taken out of the Green Belt, the background paper and the policy Reasoned Justification have some information, but it would be clearer if these exceptional circumstances were set out in one place- the table in the background paper looks at impact on distances between settlements as a result of the proposal, but only uses the 54ha PDL area, when supporting text indicates that it may be much larger. (iv) More needs to be included on delivery and flexibility, and how the proposal will be brought forward: brief details are included at Appendix 1, but these need to be expanded upon for such an important proposal: for example, how will HA and any other concerns be addressed on infrastructure; the strategy seems to rely on the planning application but this proposal isn’t reflected in the plan policy; where will funding come from etc? What will happen if nothing comes forward? Presumably St Helens would change the land back to Green Belt and should say so? Where will detail of the implementation of the proposal be set out SPD, AAP? Is it a strategic location rather than site? If you intend to make it a strategic site in terms of the CS then you have to resolve the boundary issue. How does it relate to Ditton etc? These matters need to be addressed in order to make the policies clear and sound.

**What changes required?**

Provide clarity on the position on the Green Belt and the site/location and justify it with exceptional circumstances for any land that is removed, indicate appropriate scale of development (and justify it), and provide more information on delivery/implementation.
Council view
Partly Agree Recommend Change

Justification
The Council acknowledges the weaknesses in the evidence base regarding Parkside and the lack of clarity in the policy. A new Background Paper to support the Parkside element of the Core Strategy has been prepared to cover the issues identified by GONW.

Change in Re-Publication Core Strategy
That policies CSS 1 and CAS 3.2 be amended to reflect the changes identified in the new evidence contained in the Background Paper. Amend policy CSS1 point viii:

Amend Policy CSS1 part (viii):
“An area of land, principally based on the former Parkside Colliery, is identified as a strategic location for a Strategic Rail Freight Interchange. Subject to an appropriate scheme coming forward meeting policy CAS 3.2 which receives planning permission the land will then be removed from the Green Belt through the Allocations and Proposals Map DPD and allocated for a Strategic Rail freight Interchange subject to meeting policy CAS3.2.”

Policy CSS 1 Overall Spatial Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB374</td>
<td>Government Office for the North west</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?
New text

Any other comments?
Minor textual comment

Why considered unsound?
Implementation of the Mid Mersey Growth Point Programme of Development would also seem to be a key delivery item here.

What changes required?
Include Implementation of the Mid Mersey Growth Point Programme of Development as a key delivery item.

Council view
Agree recommended change

Justification
The Council acknowledges that the implementation of the Growth Point Programme of Development is a key delivery item

Change in Re-Publication Core Strategy
Add “Implementation of the Mid Mersey Growth Point Programme of Development” in the list of Key delivery items.

Policy CSS 1 Overall Spatial Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>316124</th>
<th>Henderson Homes Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB703</td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
</tr>
<tr>
<td>Issue raised</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
Why considered unsound?
Policy CSS1 sets out the overall distribution of development within St Helens to 2025. To summarise, the policy seeks to direct a majority (72%) of new residential development to St Helens town, with the remainder to be directed towards Newton-le-Willows and Earlestown (20%), Haydock and Blackbrook (5%) and Rural St Helens (3%). Paragraph 11.2 clarifies that the main settlements within Rural St Helens are Rainford, Billinge, Garswood and Rainhill. It is clear however at paragraph 11.4 that Rainford is a key settlement as it has a local shopping centre and secondary school, both of which are key elements to the overall sustainability of a settlement. However, what is clear is that Rainford should take a greater percentage of the overall housing requirement, as it is a strong housing market with lower levels of unemployment and higher levels of elderly people. This is set out in paragraph 11.3 of the CSSD. Therefore, rather than preventing any further development within settlements such as Rainford as would be the case, new development with an increased population should be encouraged to maintain the viability and vitality of the schools as well as the local shopping centre. As a result, we consider that a greater proportion of the housing requirement should be provided within Rural St Helens. This will not only provide additional open market housing but also further affordable housing which will bring forward mixed and balanced communities.

What changes required?
Therefore to conclude, we consider that Rural St Helens should be split into two, with Rainford and Rainhill given greater priority than Billinge and Garswood for development. We consider that the percentage for St Helens and/or Newton-le-Willows and Earlestown can be reduced slightly to accommodate a higher requirement in Rural St Helens. This would not result in any significant change to the overall distribution of development as the majority would still be located at St Helens, Newton-le-Willows and Earlestown and therefore the plan would remain sound.

Council view
No change recommended

Justification
These percentages are not intended to be prescriptive but instead indicative. However, the Core Strategy’s Spatial vision includes the statement that “…the majority of new housing developed, including affordable housing, will be developed in the core settlement of St. Helens, with particular priority on creating sustainable communities in the deprived areas, including parts of Parr, Thatto heath, Four acre and St. Helens town centre.” The core settlement area, in particular the areas named, have a significant need for housing-led regeneration. They also have a significant proportion of the available previously developed land identified by the SHLAA and which RSS requires the majority of development to be on. They are also more accessible locations in terms of jobs and services (and hence more sustainable) than the outlying areas classified as “rural” by policy CAS5. This combination of sustainable location with PDL supply and a need for regeneration support the approach in policy CSS1 to the indicative distribution of development.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491 Miss Lesley Bye</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB721</td>
</tr>
</tbody>
</table>
Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? Yes

If not, why not?

Any other comments?
We suggest that Part 2 of the policy could include a further bullet point as follows: v.
Contribution to sub-regional and local waste management infrastructure

Why considered unsound?

What changes required?

Council view
No change recommended

Justification
This part of the policy is about supporting regeneration initiatives. Waste management infrastructure provision does not have regeneration as its primary objective and so is not suitable for inclusion in this list, otherwise other forms of development such as house building should be included.

Change in Re-Publication Core Strategy
No change

Policy CSS 1  Overall Spatial Strategy

Respondent 374466  Gresham House Plc
Representation CSPUB729

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? No

If not, why not?
GVA Grimley were not instructed by the land owners Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

Any other comments?

Why considered unsound?
Policy CSS1 provides very specific targets as to the distribution of residential development between St Helens (72%), Newton le Willows (20%) with the balance in the remainder of the Borough. Whilst the principle of directing the majority of residential development to the two main urban settlements is supported, we would question whether it is necessary for CCS1 to be so specific in its approach. The general commitment to focus development within the main urban settlements is supported but the provision of specific percentages may have the effect of artificially constraining the development of prope, previously developed land in Newton le Willows or Haddock which would otherwise be in full accordance with the principles of existing and the emerging policy strategy. Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

What changes required?
Removal of the specific percentage figures from Policy CSS1 and a replacement with a general commitment to focus on the two main urban settlements of St. Helens and Newton le Willows, as set out in paragraph 6.3 of the draft document. Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

Council view
No change recommended
Justification
These percentages are not intended to be prescriptive but instead indicative. However, the Core Strategy’s Spatial vision includes the statement that “…the majority of new housing developed, including affordable housing, will be developed in the core settlement of St. Helens, with particular priority on creating sustainable communities in the deprived areas, including parts of Parr. Thatto heath, Four acre and St. Helens town centre.” The core settlement area, in particular the areas named, have a significant need for housing-led regeneration. They also have a significant proportion of the available previously developed land identified by the SHLAA and which RSS requires the majority of development to be on. They are also more accessible locations in terms of jobs and services (and hence more sustainable) than the outlying areas classified as “rural” by policy CAS5. This combination of sustainable location with PDL supply and a need for regeneration support the approach in policy CSS1 to the indicative distribution of development.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB851</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? No Issue raised before? No

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment Any other comments?

Why considered unsound?
The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on coal mining. The Coal Authority set up a new Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to the Coal Authority in terms of policy making relate to: the safeguarding of coal as a mineral in accordance with the advice contained in MPS1 and MPG3 in England; and ensuring that future development is undertaken safely and reduce the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in PPG14 and MPG3 in England. The Coal Authority is concerned that St. Helens Council may not have taken due regard of mining legacy issues in developing its Core Strategy. Coal resources are prevalent within St. Helens and therefore legacy issues, such as land instability and mine entries are possible. Many local authorities have recently liaised with the Coal Authority to view our mining records and discuss the most appropriate approach for their strategic allocations to take. To our knowledge St. Helens Council has not actively sought dialogue with the Coal Authority regarding the preparation of the Core Strategy, including the identification of strategic development areas, such as three proposed urban villages. Even at this late stage in the plan-making process we would be happy to discuss these matters with the Council and make our information available as evidence to inform the selection of strategic areas for development. In preparing the LDF the Local Planning Authority should obtain information on mine entries and mining legacy matters as part of the robust evidence base to ensure sites allocations and other policies and programmes will not lead to future public safety hazards.
What changes required?

Council view
No change recommended

Justification
The Council welcomes the advice of the Coal Authority and will engage with them when appropriate. Most of St.Helens is designated by the Coal Authority as an area where they need to be consulted on planning applications and are they are consulted in accordance with their instructions. The Council does not consider it appropriate at Core Strategy stage to consider detailed site development issues, however constraints such as cola measures and old coal workings will be considered when assessing sites for inclusion in the Allocations DPD stage.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>The Director</td>
</tr>
<tr>
<td>Representation</td>
<td>Church Commissioners for England</td>
</tr>
<tr>
<td>CSPUB1742</td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before?
If not, why not?

Any other comments?

Why considered unsound?
There should be a greater commitment in Policy CSS1 to a Strategic Review of the Green Belt boundary taking place in 2012. Section 1vii of the policy refers to a Green Belt review at the "Sub-Regional level after 2011". The phrase after 2011 is very 'open-ended' and it is considered that there should be a reference to such a review taking place in 2012. Whilst not wishing to formally challenge the soundness of the Core Strategy, there are concerns about the following aspects of Policy CSS1:- * The low % of housing proposed for the 'Rural Areas' - 3%; * The focus of this and other policies on regeneration at the expense of any positive policies for the rural areas generally and specifically for settlements such as Rainford that lie within the Rural Areas and have a tightly drawn Green Belt boundary that constrains any further expansion.

What changes required?
The following amended wording to Section 1vii of the policy is suggested:-“the general extent of the Green Belt as indicated on the Core Strategy key diagram will be maintained in the short to medium term. The strategic review of the Green Belt will be dependent on work carried out at the Sub-Regional level in 2012”. It is requested that any future review of Green Belt boundaries gives serious consideration to the negative aspect of the above and the lack of opportunities for expansion and development at free-standing settlements such as Rainford.

Council view
No Change Recommended

Justification
It is maintained that the wording of Policy CSS1 should be kept flexible to allow for a sub-regional review to be conducted after 2011, in line with RSS Policy RDF4. Paragraph 6.10 of the Core Strategy states that “In terms of housing, the SHLAA identifies enough land to meet
requirements until 2020/21. Beyond that, it is felt that windfall will be a source of sites but that any further land requirement should be dealt with through a sub regional assessment". Paragraph 14.16 also states that: "In consultation with 4NW the Merseyside Authorities (including Halton and West Lancashire) have committed themselves to assess the need for potential Green Belt release based on a comprehensive analysis of all completed SHLAAs".

The Core Strategy directs the majority of development to the main urban settlements of St.Helens, Haydock and Newton-le-Willows to support the Council’s commitment to regeneration. These areas benefit from having the greatest concentration of previously developed land, contain the most deprived areas of the Borough where regeneration is most needed, and benefit from a range of accessible services and facilities.

The level of development directed to the rural areas of the Borough reflects the amount of land available within existing settlement areas and existing identified major developed sites, whilst respecting the need to protect local character and heritage with sensitive and well judged development. Despite this, Policy CAS5 aims to encourage and support the rural areas, in particular by supporting and diversifying the rural economy and making rural areas more accessible both for employment and housing but also for recreation and biodiversity.

**Change in Re-Publication Core Strategy**
No Change

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td><strong>81908</strong></td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB1771</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Any other comments?</strong></td>
<td>Pleased that there are no incursions into the Green Belt around Rainhill</td>
</tr>
</tbody>
</table>

**Why considered unsound?**

**What changes required?**

**Council view**
Comments Noted

**Justification**

**Change in Re-Publication Core Strategy**
No change recommended

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td><strong>83425</strong></td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB1736</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Any other comments?</strong></td>
<td></td>
</tr>
</tbody>
</table>
Why considered unsound?
(Summarised) Morrison object to the criteria of (iv) which refers to the hierarchy of centres within the Borough. Morrisons operate the Anchor store at Boundary Road. Boundary Road has previously listed as a Local Centre in the UDP in Ret 2 Schedule 2 - Shopping Centres. However, this designation has not been carried through the Core Strategy despite no material change in the definitions provided by the superseded PPG6 and PPS6. The Core Strategy should recognise Boundary Road as a Local Centre to allow for opportunities to promote the clustering of activities to achieve sustainable development. The extent of centres should be clearly shown on the proposals map to ensure its possible to distinguish the locations of future development proposals as to whether they fall within, on the edge of or outside designated centres.

What changes required?
Include Boundary Road within the identified centres shown in CSS1 iv.

Council view
No Change Recommended

Justification
In 2006 WYG were commissioned to carry out a Local Centres Study on behalf of St Helens Council. The study found that Boundary Road displayed the characteristics of a retail park with retailing taking place in two purpose built units with a large amount of car parking. The findings of the study show that the centre doesn't have any of the other key facilities normally located within a local or district centre such as a bank or a post office and that Morrisons appears to function as a freestanding store. The study concludes that Boundary Road doesn't have the characteristics of a local centre as defined by PPS6. Whilst Boundary Road is close to Newton Local Centre, the two areas are not well linked.

Change in Re-Publication Core Strategy
No policy changes required.

Policy CSS 1  Overall Spatial Strategy

<table>
<thead>
<tr>
<th>Respondent Representation</th>
<th>Mr Jonathan Burns  DPP Planning Consultancy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Any other comments?

Why considered unsound?
Supports the potential for review of the extent of the centre designations through the allocations DPD, particularly Clipsley Lane Local Centre in Haydock. However, in doing so, there should be some flexibility in considering which centres such as Clipsley Lane should be upgraded to a District Centre especially given the lack of district centres serving this part of the Borough. This also supports Policy CAS4 which we note highlights the need to review the status as well.

What changes required?
After 1.(iv) insert "District Centre boundaries are to be identified in the allocations DPD and this may result in amendments to some centre designations."

Council view
No Change Recommend
A change to the hierarchy of centres cannot be via the Allocations DPD, it must be via the Core Strategy. The Local Centres Study published in 2006 and prepared by White Young Green identifies the boundaries and the centres designation within the Boroughs retail hierarchy. At the time of publishing it was not considered appropriate to include Tesco at Clipsley Lane as it may operate on a stand-alone basis. The study recommends that the suggested boundary of the local centre should be reviewed once trading patterns have been established and is reflected in Policy CAS4. This will take the form of an assessment looking at the function of the centre, including the mix of services and its boundary. If there is a need to alter the retail hierarchy detailed within the Core Strategy a revision of the Core Strategy will be made to reflect the change.

**Change in Re-Publication Core Strategy**
No Change

<table>
<thead>
<tr>
<th>Policy CSS 1</th>
<th>Overall Spatial Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Ms Lisa Henderson</td>
</tr>
<tr>
<td>Representation</td>
<td>LDF Manager Highways Agency</td>
</tr>
<tr>
<td>CSPUB1832</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Why considered unsound?**
The Highways Agency welcomes St Helens proposed policy to locate the majority of future developments within the town centre. It is widely recognised that established local centres possess the greatest potential for future developments to operate in a sustainable manner. Regarding areas outside the conurbation of St. Helens itself, the Agency would support the policy of locating the majority of new development within existing urban centres such as Earlestown, thus maximising the reuse of brownfield sites. This particularly applies where sites have an excellent potential for sustainable travel to and from the site. Policy CSS1 focuses economic development to the south of the borough along the new A570 St. Helens Linkway. As a consequence, a number of brownfield sites in areas with good accessibility via bus and rail are earmarked for future development. However, this area is also served by junction 7 of M62, therefore we would like to be involved at the earliest stages of any consultation regarding and development proposals in this area. This is to ensure there is no material impact upon the operation of Junction 7 of the M62 and the sustainable potential of these sites is maximised.

**What changes required?**

**Council view**
Comments Noted

**Justification**
The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network. The Allocations DPD will take account of the Liverpool City Region Transport Model, to which the Highways Agency has contributed, which takes account of all housing and employment sites in St Helens. The Highways Agency will be consulted on any planning applications which may have an impact on the Strategic Road Network.

**Change in Re-Publication Core Strategy**
No change
Policy CSS 1  Overall Spatial Strategy

Respondent  82550  Mr Steven Broomhead  Chief Executive Northwest Regional Development Agency
Representation  CSPUB1777

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  No

If not, why not?
Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?
Clause viii of the policy says that ‘an area principally based on the former Parkside Collery will be removed from the Green Belt and allocated for a Strategic Rail Freight Interchange subject to meeting Policy CAS 3.2’. The Agency welcomes this reference to Parkside within the overall spatial strategy on the basis that it will facilitate delivery of the Parkside strategic regional site in accordance with Action 80 of the Regional Economic Strategy. We do, however, have some concerns regarding the clarity of Policy CAS 3.2. On a point of detail, paragraph 6.10 says that Policy CAS 5 provides more detail regarding the strategic rail freight facility at Newton-le-Willows. As CAS 3.2 is the relevant policy we presume this is a typographical error.

Why considered unsound?

What changes required?

Council view
Agree Recommend Change

Justification
Support noted. The reference to policy CAS 5 Rural St.Helens at 6.10 appears to be an error. If the last sentence of 6.10 is to be retained it should be changed to CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery.

Change in Re-Publication Core Strategy
Last sentence of paragraph 6.10 to read ‘. . . is discussed in more detail in CAS 5 Rural St Helens Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery.’

Policy CIN 1  Meeting St. Helens' Infrastructure Needs

Respondent  82491  Miss Lesley Bye  Contaminated Land Team Leader Merseyside Environmental Advisory Service
Representation  CSPUB723

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  Yes

If not, why not?

Any other comments?
We suggest that the Key Delivery Items table should also include the Waste DPD.

Why considered unsound?

What changes required?
Council view
Agree Recommend Change

Justification
Agree. The Waste DPD seeks to meet the waste infrastructure needs and could help with delivery of the policy.

Change in Re-Publication Core Strategy
Waste DPD to be added to Key Delivery Items table in CIN 1.

<table>
<thead>
<tr>
<th>Policy CIN 1</th>
<th>Meeting St. Helens' Infrastructure Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82085 Ms Lisa Henderson LDF Manager Highways Agency</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1833</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | Issue raised before? |
If not, why not? |

Any other comments?

Why considered unsound?
The Highways Agency should support SHBC’s aspirations to promote development in locations that have existing transport infrastructure in-place, especially those located in town centres and / or on previously developed land with good public transport links. The Agency should encourage and become involved with the proposed initiative to facilitate Council and infrastructure provider joint working.

What changes required?

Council view
Comments Noted

Justification
The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>p 6.14</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315762 Mrs Dianne Wheatley Spatial Development Manager Government Office for the North west</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB377</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | Issue raised before? |
If not, why not? |

Any other comments?
Minor textual comment

Why considered unsound?
The context of CIL should be mentioned here as background: i.e. detail and Regulations are still to be provided by the Government, and only then can the Council proceed with plans to implement CIL.

What changes required?
Include context of CIL here as background

Council view
Agree Recommend Change

Justification
Agree - additional context could be added to explain the CIL process.

Change in Re-Publication Core Strategy
Amend last two sentences of 6.14 as follows:
"This will be achieved through a number of methods including on and off site provision and financial contributions secured through obligations in the short term, and in the medium to long term this could be secured through the Community Infrastructure Levy (CIL), which was introduced by the Planning Act 2008 to be enacted though Regulations in April 2010. Once enacted the Council may choose to implement this mechanism as a source of funding for infrastructure. The CIL will be supported by the production of an Infrastructure Plan DPD."
Chapter 7 – St.Helens Core Area

Policy CAS 1	St. Helens Core Area Strategy

Respondent	MS Lisa Henderson	LDF Manager Highways Agency
Representation	CSPUB1834

Legally Compliant?	Sound?	Issue raised before?
If not, why not?

Any other comments?

Why considered unsound?
The Agency should support the policy which will see St. Helens Town Centre become the focal point for the majority of new development within the Borough. The Agency should encourage any development which looks to redevelop brownfield land and locate high trip generating development schemes in areas that benefit from access to services and to existing public transport links. Notwithstanding this, the focus on locating economic development within the Southern Corridor should not be supported by the Agency until site specific details and sustainable modes infrastructure are more clearly defined, as unsustainable sites in this location could impact upon the operation of M62 Junction 7. If sites in this location can be developed and brought forward on a sustainable basis, which minimises the impact to the SRN, the Agency can support the proposals, whilst working in tandem with SMBC through any Influencing Travel Behaviour principles. Connectivity between the Southern Corridor and the St. Helens Core Area should be improved to ensure sustainable travel, and subsequently reducing any impacts upon the SRN. The remediation of transport issues surrounding the new St. Helens RLFC Stadium has already been agreed with the Agency through the planning process at this site, as stated in JMP’s response to the Agency regarding the St. Helens Preferred Option Report.

What changes required?

Council view
No Change Recommended

Justification
The Council notes the concerns of the Highways Agency. Transport issues are dealt with in more detail by policy CP2, Creating An Accessible St.Helens, and the Transport SPD. The Allocations DPD will consider the most suitable uses for these sites and will take account of the Liverpool City Region Transport Model, to which the Highways Agency has contributed, which takes account of all housing and employment sites in St Helens. The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network.

Change in Re-Publication Core Strategy
No change

p 7.5 Paragraph

Respondent	Miss Lesley Bye	Contaminated Land Team Leader Merseyside Environmental Advisory Service
Representation	CSPUB727
Any other comments?
We suggest adding to the text “creating new uses of greenspace and developing new green infrastructure.”

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
We suggest addition of the text “creating new uses of greenspace and developing new green infrastructure.”

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
We suggest addition of the text “The Forever Meadows project will contribute to the objectives of policy CAS1 by bringing grassland Local Wildlife Sites into active conservation management.”

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
Agree that the Forever Meadows project is an important delivery project for conservation management and ecological frameworks, however, it is one example of a number of relevant projects. As a result suggest the inclusion of a paragraph on the delivery of the ecological frameworks within the justification for policy CQL 3 Biodiversity and Geological Conservation whereby the Forever Meadows project can be included as an example of its delivery.

**Change in Re-Publication Core Strategy**

Insert text at the end of paragraph 16.26: “The ecological framework will be delivered through a broad range of projects and initiatives including the 'Forever Meadows Project', 'New Lowlands Water Vole Project' and the 'Brown Hares' Initiative'.
Chapter 8 – St Helens Town Centre

<table>
<thead>
<tr>
<th>p 8</th>
<th>St. Helens Town Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315762</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB382</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>N/A</td>
</tr>
<tr>
<td>Any other comments?</td>
<td>Minor textual comment</td>
</tr>
</tbody>
</table>

Why considered unsound?
St Helens Town Centre diagram: remove “suggested” from the Prime Shopping Area in the key as the plan is meant to read as though final.

What changes required?
remove “suggested” from the Prime Shopping Area in the key

Council view
Agree Recommend Change

Justification
The word "suggested" has remained from a previous draft.

Change in Re-Publication Core Strategy
Amend key in diagram of Primary Shopping Area under paragraph 8.14: Proposed Town Centre Boundary and Proposed Primary Shopping Area.

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>303551</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB6</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td>We would request that all major new developments (retail or otherwise) should be integrated into the public transport network to improve accessibility for all and sustainable development.</td>
</tr>
</tbody>
</table>

Why considered unsound?

What changes required?

Council view
No change recommended
**Justification**

Whilst we agree with the desired outcome, it is not necessary to change this policy as this is covered by policy CP2 and the Ensuring Choice of Travel SPD

**Change in Re-Publication Core Strategy**

No change

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491</td>
</tr>
<tr>
<td>Miss Lesley Bye</td>
<td>Contaminated Land Team Leader</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB731</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
</tbody>
</table>

**Any other comments?**

We query whether point 4 should include industrial uses (including waste management infrastructure)? There also appear to be industrial areas located within the Town Centre map (Pocket Nook & along the canal) clarification of this would be helpful.

**Why considered unsound?**

**What changes required?**

**Council view**

No Changes Recommended

**Justification**

Point 4 highlights high-density mixed-use, office and residential developments are suitable for the town centre spatial area to support the vitality and viability of the town centre. These uses are also less suitable in other locations. Neither PSS 6 or Draft PPS 4 class industrial development as a town centre use. The areas in question are also covered by the Eastside Masterplan, which highlights the Councils aspirations to redevelop these areas for housing and office developments.

**Change in Re-Publication Core Strategy**

No Changes Recommended

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81646</td>
</tr>
<tr>
<td>Judith Nelson</td>
<td>English Heritage (North West Region)</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1744</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>The issue was not raised previously because detailed wording within the policy had not been included.</td>
</tr>
</tbody>
</table>
Any other comments?

Why considered unsound?
Summary - There are some internal inconsistencies between policy CQL4 and policy CAS2. For example, policy CQL4 discusses the implementation of Conservation Area Appraisals and Conservation Area Management Plans for all ten conservation areas. Policy CAS2 on the Town Centre discusses only a Conservation Area Appraisal of town centre conservation areas and omits Conservation Management Plans for Town Centre Conservation Areas.

What changes required?
Add to policy CAS2 Amend point 7. Undertaking appraisals of the Town Centre Conservation Areas and implementing Management Plans through the Town Centre Area Action Plan.

Council view
Agree Recommend Change

Justification
Agree text should be amended to identify that Town Centre Conservation Management Plans will be incorporated into the Town Centre Area Action Plan.

Change in Re-Publication Core Strategy
Add to policy CAS2 Amend point 7. Undertaking appraisals of the Town Centre Conservation Areas and implementing Management Plans through the Central Spatial Area Area Action Plan.

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82023 Ms Rose Freeman The Theatres Trust</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1738</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td></td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
</tbody>
</table>

Any other comments?

Why considered unsound?
Sound in respect of Policy CAS2 which recognises the town centre as a destination for cultural activities.

What changes required?
No change.

Council view
No Change Recommended

Justification
Comments noted.

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>83425 Morrison W M Morrison Supermarkets Plc</td>
</tr>
</tbody>
</table>
Representation CSPUB1737

Legally Compliant? Sound? No Issue raised before? Yes

If not, why not?

Any other comments?

Why considered unsound?
(Summarised) Morrisons supports the aim of delivering additional comparison floorspace in the town centre. But do not agree with the approach outlined in policy CAS2 in relation to the relocation of Tescos to the United Glass site and have previously objected. Morrisons maintain that if it were possible for the college to locate to another site possibly the former Lead Mill Site then Brook St would provide an appropriate location for new comparison retailing within the town centre. In contrast the United Glass site is in an out-of-centre location, which is contrary to the aims, and objectives of PPS6. The application proposes a Tesco’s Extra store of 13000sqm gross (8446 net), more than twice the existing store at Chalon Way. It is also considered that there is insufficient quantitative need for the proposal, with consequent risk of unacceptable impact on the vitality and viability of the town centre.

What changes required?
CAS2 must be qualified to make it clear that the preferred location for new comparison goods is a combination of the existing Tesco’s Superstore on Chalon Way and the enhancement of the existing Church Square Shopping Centre, subject to any relocation of the existing Tesco’s store meeting national retail planning policy guidance with regard to the scale of any replacement provision.

Council view
No Change Recommended

Justification
The proposed new Tesco store at the UG site has received planning permission and was not called in by the Secretary of State. The retail Assessment submitted by DPP has been assessed by WYG who summarise that. "The report has demonstrated that the level of retail floorspace proposed can be accommodated based on a marginal and realistic increase in current market shares”. The proposed redevelopment of their existing site at Chalon Way for comparison retail has also been granted planning permission. The relocation of the College to the Former Lead Mill site is unrealistic because of insufficient space now that the site is part developed following the construction of St Helens Chamber Enterprise Centre. St Helens College have made significant investment in the redevelopment of their existing site.

Change in Re-Publication Core Strategy
No policy changes required.

<table>
<thead>
<tr>
<th>Policy CAS 2</th>
<th>Town Centre Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent Representation</td>
<td>Mr Jonathan Burns DPP Planning Consultancy</td>
</tr>
<tr>
<td>CSPUB1726</td>
<td>223810</td>
</tr>
<tr>
<td>Legally Compliant? Sound? Issue raised before?</td>
<td>Yes Yes, with minor changes Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td></td>
</tr>
</tbody>
</table>

Why considered unsound?
Support redevelopment of Tesco site and Church Street Shopping Centre for
development of additional comparison goods. Disappointed that Tesco site not in the Primary Shopping Area given the emphasis of this site for comparison goods ensuring St. Helens maintains its market share. The preferred options document envisaged that retail development on the site was to function as part of the core retail offer in the town centre meeting an identified need. The site is less than 100m from the middle of prime shopping frontage, with strong links. Therefore it appears there is no justification for the sites exclusion from the primary shopping area boundary, especially given the impetus PPS6 places on a plan-led approach to town centres to increase the vitality and viability and in particular the planned expansion of primary shopping areas. It is considered that the inclusion of the site within the primary shopping area would signify a clear way forward to developers regarding the expansion of comparison goods retailing within the town centre and in setting out a strategy for defining the primary shopping area in accordance with PPS6. It is considered that the proposals still do not go far enough to address this. This is particularly important, as it appears that the town centre boundary is drawn more widely now to encompass an extended area. It is considered, therefore, that more certainty should be provided and that the Chalon Way site is an important town centre redevelopment opportunity. Given the expanded town centre boundary further clarification should be given to the town centre boundary as shown on page 46 & 50 and the importance of the Primary Shopping Areas & outlying areas within the boundary.

What changes required?
Amend boundary to include the Tesco Chalon Way Site.

Council view
No Change Recommended

Justification
Following the release of PPS6 White Young Green were commissioned to carry out the Future Town Centre & Primary Shopping Area Boundary Study in 2006. The purpose was to identify a set of town centre boundaries that are compliant with the policy changes introduced by PPS 6. The Study concluded that. "The Tesco's food store is not contiguous with the prime retail frontage. However, the northern edge of the car park is just 90 meters from Prime Retail Frontage and is well linked via Market St." WYG suggest that Chalon Way West creates a barrier between the Tesco's site and the Prime Retail Frontage and state that "The lack of active frontage along Chalon Way West and the fact that the Tesco store is approximately 200m (as the crow flies) means that we would question whether it is closely related. On this basis, we would consider that a robust boundary for the definition of the primary shopping area would be Chalon Way West."

Change in Re-Publication Core Strategy
No changes to the policy

Reason for change: On further examination of the covering letter submitted additional points were discovered that had not been included on the submitted representation form.

Policy CAS 2 Town Centre Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>366515</th>
<th>ING Real Estate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1756</td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  |  Sound? Yes, with minor changes  | Issue raised No  | Before?  |

If not, why not? The specific issue had not come to our attention.
Any other comments?
Why considered unsound?
The Core Strategy is unsound because it is not consistent with national planning policy. This policy does not distinguish the sequentially preferable sites within the primary shopping area over sites on the edge of the primary shopping area. Strictly speaking the latter should be subordinate to the former in terms of PPS6 and draft PPS4. The town centre first approach to retail development identified in PPS6 reads. "All options in the centre should be thoroughly assessed before less central sites are considered for development for main town centre uses. Section 2.44 of PPS 6 sets out the sequential approach to site selection and states that local planning authorities should seek to identify sites for allocation within centres, and that all central sites should be thoroughly assessed before less central sites are considered. St Helens Council has identified central and edge of centre sites as suitable, but the core strategy policy should encourage development in the more central located sites first.

What changes required?
Proposed amendment. The priority location for additional comparison retail floor space will be, firstly, within the primary shopping area and, secondly, (If there are no sites available in the primary shopping area) on the edge of the primary shopping area, in accordance with the sequential approach. Well integrated, edge-of-centre sites, with good linkages should be prioritised over other edge-of-centre sites.

Council view
Partly Agree Change

Justification
During preparation of the preferred options the Council prepared TP27, St Helens Core Strategy, Preferred Options, Town Centre Site Appraisals. The report shows that there are currently no sequentially preferable sites available within the Town Centre that are capable of accommodating the floorspace requirements identified by WYG.

The redevelopment proposals identified within the policy represent the best opportunity to accommodate the identified additional comparison floorspace.

Change in Re-Publication Core Strategy
Reword part 1 of policy CAS 2:

"The priority location for additional comparison floorspace will be within or on the edge of the primary shopping area and will comprise at least 17,000m2 (Net) comparison floorspace

• The redevelopment of the existing Tesco superstore site on Chalon Way; and

• The enhancement of the existing Church Square Shopping Centre"

"Providing at least 17,000m2 (net) of comparison retail floorspace through the redevelopment of the existing Tesco superstore site on Chalon Way and the enhancement of the existing Church Square shopping centre in accordance with the relevant policies in PPS4."

Page 56 of 248
### Chapter 9 – Newton Le Willows and Earlestown

#### Policy CAS 3.1  Newton-le-Willows and Earlestown Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>81816 Mr P Sargeant</td>
<td>CSPUB1868</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**If not, why not?**

**Any other comments?**

**Why considered unsound?**

*The proposed Academy is referred to as being a previously developed site when planning permission has not yet been granted for its redevelopment.*

**What changes required?**

**Council view**

*No Change Recommended*

**Justification**

*The designation of a Major Developed Sites in the Green Belt is not the same as identifying all of the site as Previously Developed land. PPG2 allows the designation of a major developed site where infilling or redevelopment will be allowed, but this will not mean a major increase in the developed proportion of the site or occupy a larger area of the site than the existing buildings occupy. The planned Hope Academy was at an advanced stage of planning at the time of publication and planning permission has now been granted.*

**Change in Re-Publication Core Strategy**

*No Change*

---

**Reason for correction:** Representation accidentally omitted.

*The following representations CSPUB 1844; CSPUB 1863-1866 and CSPUB 1870-1891 were accidentally omitted.*

#### Policy CAS 3.2  Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>82230 Dr Mercer</td>
<td>CSPUB1844</td>
<td>No</td>
</tr>
</tbody>
</table>

**If not, why not?**

**Not aware**

**Any other comments?**

*Object to declassification of land from Green Belt, this will have a serious affect on living conditions.*

**Why considered unsound?**

**What changes required?**

**Council view**

*No Change Recommended*

**Justification**

*Given the significance of the scheme at a national and regional level it is considered that “exceptional circumstances” exist to consider removal of land from the Green Belt, in line with PPG2 and this case is outlined in full in the revised Background Paper.*

**Change in Re-Publication Core Strategy**

*No change*

---

*Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former*
## Parkside Colliery

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1863</td>
<td></td>
</tr>
</tbody>
</table>

**Legally Compliant?**  No  **Sound?**  No  **Issue raised before?**  Yes

**If not, why not?**

**Any other comments?**

**Why considered unsound?**

Little attention has been paid to Mr Sargeant's previous suggestions to change the policy, and the policy has parts that have no clear purpose or meaning.

**What changes required?**

---

### Council view

**No Change Recommended**

**Justification**

All of Mr Sargeant's comments will have been considered by the Council and changes will have been made where the Council agrees and can make changes. Do not agree that parts do not have a clear purpose.

**Change in Re-Publication Core Strategy**

**No Change**

---

### Policy CAS 3.2

**Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1864</td>
<td></td>
</tr>
</tbody>
</table>

**Legally Compliant?**  No  **Sound?**  No  **Issue raised before?**  Yes

**If not, why not?**

**Any other comments?**

**Why considered unsound?**

Mr Sargeant remains of the view that the policy on Parkside should be modified, or replaced, along the lines he suggested in the last round, with suitable amendment of some of the cross-referencing to other policies. Copies of those suggestions, as amended up to 7th January last year, should be appended to this submission, to that end. However, if further copies are required, Mr Sargeant will furnish them.

**What changes required?**

---

### Council view

**No Change Recommended**

**Justification**

We cannot accept comments relating to previous consultations. The consultation in May 2009 was on the Publication Core Strategy and comments have to be related to it. Part two of the comments form states that "Please note that all representations made previously cannot be carried forward". The note under question 8 states that: "Your representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage."

**Change in Re-Publication Core Strategy**

**No Change**

---

### Policy CAS 3.2

**Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816</th>
<th>Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1865</td>
<td></td>
</tr>
</tbody>
</table>

**Legally Compliant?**  No  **Sound?**  No  **Issue raised before?**  Yes

**If not, why not?**
Any other comments?
Why considered unsound?
There is a need to ensure flexibility given the current economic climate and to
tackle the problems faced by local residents living next to a vacant site, such as
illegal encampments and illegal dumping of waste.
What changes required?

Council view
No Change Recommended
Justification
Policy CAS 3.2 is concerned about the provision of a SRFI at Parkside, in line with
our interpretation of RSS policy and research, and it cannot be flexible about what is
acceptable on the site if it is the only suitable site for a SRFI at Newton Le Willows.
Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816 Mr P Sargeant</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1866</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No  Sound?</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The document and supporting documents have several unexplained abbreviations,
inconsistent use of language, definitions unclear, the internal logic does not always
join up and factual errors.
What changes required?

Council view
Partly Agree Recommend Change
Justification
The policy and supporting text has been extensively re-drafted to address concerns
and improve legibility.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816 Mr P Sargeant</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1870</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No  Sound?</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The cover photograph of the Parkside Background Paper is misleading as it was
taken shortly after the closure of the site but the landscape has changed quite
considerably, reverting to nature.
What changes required?

Council view
Comments Noted
Justification
It was not intended to mislead and the cover picture has now been changed to an
aerial photograph.
Change in Re-Publication Core Strategy
Front cover of background Paper photograph amended (no change reference...
**Policy CAS 3.2**  
**Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

**Respondent** 81816  
**Representation** CSPUB1871  
**Legally Compliant?** No  
**Sound?** No  
**Issue raised before?** Yes

If not, why not?  
Any other comments?  
Why considered unsound?  
It is unclear why Parkside is included in the policy section for Newton Le Willows and Earlestown when other Green Belt sites are included in policy CAS5, including Newton Le Willows High School (the proposed site for Newton / Hope Academy). Also, diagrams on pages 52 and 70 demonstrate that a sliver of the Parkside site is attributed to rural St Helens and the Parkside site provides an opportunity to provide green infrastructure, as covered by point 2 of CAS5 and the list of green infrastructure opportunities at 11.12.

What changes required?  
**Council view**  
**No Change Recommended**  
**Justification**  
The figure of 54 Ha has now been superseded. St. Helens were asked by Government Office North West to indicate the likely scale of development. Research was undertaken (see Parkside background paper) on the likely scale of development required to provide a viable development. This research indicates a likely operational area of 85 Hectares on the western side of the M6, with possible...
expansion to the east of the M6 should need be demonstrated. Policy CAS3.2, supporting text and the diagram have now been amended accordingly.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr P Sargeant</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No                          Sound?</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
Any commitment to remove land from the green belt should be expressed in terms of area to be eventually developed.
What changes required?

Council view
Partly Agree Recommend Change
Justification
Policy CAS 3.2 has now been amended to explain that land will only be removed from the Green Belt through an Allocations and Proposals Map DPDs if planning permission has been granted.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr P Sargeant</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No                          Sound?</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The policy should refer to Willow Park Conservation area, which is mentioned in paragraph 9.38
What changes required?

Council view
Agree Recommend Change
Justification
Willow Park Conservation area has now been included in CAS 3.2
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr P Sargeant</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No                          Sound?</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
Most of the requirements could be expressed more effectively, in some case with
modest elaboration, along the lines Mr Sargeant has previously suggested.
What changes required?

Council view
No Change Recommended
Justification
If the Council has not amended the policy along lines previously suggested by Mr Sargeant then it did not consider it necessary or possible.
Change in Re-Publication Core Strategy
No Change

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 81816 Mr P Sargeant
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?
Any other comments?
Why considered unsound?
Point 8 is poorly worded and with little practical benefit
What changes required?

Council view
No Change Recommended
Justification
The purpose of this paragraph is to illustrate the likely scope of site development issues that need to be addressed in any planning application for a suitable scheme.
Change in Re-Publication Core Strategy
No Change

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 81816 Mr P Sargeant
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?
Any other comments?
Why considered unsound?
Point 9 is too vague
What changes required?

Council view
No Change Recommended
Justification
We consider point 9 to be clear, requiring any proposals to include positive management of existing and new environmental assets (e.g. landscape, trees, water courses, etc).
Change in Re-Publication Core Strategy
No Change

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 81816 Mr P Sargeant
Representation CSPUB1876
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?
Any other comments?
Why considered unsound?
Point 8 is poorly worded and with little practical benefit
What changes required?
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
The wording regarding the use of the site should the rail freight interchange not be implemented should be clearer about when the commitment to provide a SFRI should be relinquished.
What changes required?

Council view
No Change Recommended
Justification
It is difficult to indicate timescales regarding implementation as this could be affected by a wide range of factors. However, the wording has now been deleted.
Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81816</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr P Sargeant</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No  Sound?  No  Issue raised before?  Yes</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The background paper is in parts lacking understanding of the SFRI concept and operational considerations, can be interpreted in several ways, factually incorrect and conflicts with the policy by saying at least 40 hectares of land is required as opposed to 54 mentioned in the policy.
What changes required?

Council view
Agree Recommend Change
Justification
There were inconsistencies between the background paper and the policy. Both have now been updated in light of the research undertaken for the background paper and are now consistent.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

9.18 Paragraph

| Respondent     | 81816                                                                                 |
| Representation | Mr P Sargeant                                                                        |
| Legally Compliant?  | No  Sound?  No  Issue raised before?  Yes |

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.18 - references to Councils should instead refer to administrative areas
What changes required?

Council view
Partly Agree Recommend Change
Justification
Partly agree - this is a minor change that can be picked up in post-publication changes.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

### 9.19 Paragraph

**Respondent** 81816 Mr P Sargeant  
**Representation** CSPUB1880  
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?  
Any other comments?  
Why considered unsound?  
Paragraph 9.19, point (iii), is not properly expressed  
What changes required?

**Council view**  
No Change Recommended  
**Justification**  
Disagree that this is not properly expressed  
Change in Re-Publication Core Strategy  
No Change

### 9.19 Paragraph

**Respondent** 81816 Mr P Sargeant  
**Representation** CSPUB1881  
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?  
Any other comments?  
Why considered unsound?  
Paragraph 9.19, point (iv) and 9.22 has inconsistent use of capitals  
What changes required?

**Council view**  
Partly Agree Recommend Change  
**Justification**  
This is a minor grammatical issue that will be picked up in post-publication changes.  
Change in Re-Publication Core Strategy  
See revised CAS 3.2 and Background Paper

### 9.20 Paragraph

**Respondent** 81816 Mr P Sargeant  
**Representation** CSPUB1882  
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?  
Any other comments?  
Why considered unsound?  
Paragraph 9.20, use "paragraph" instead of "par"  
What changes required?

**Council view**  
Partly Agree Recommend Change  
**Justification**  
This is a minor change that will be picked up in post-publication changes.  
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

9.21  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1883
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.21 - stating that the restored colliery spoil heaps are previously developed land is factually incorrect, compare to 9.33
What changes required?

Council view
No Change Recommended
Justification
The Council considers the spoil heaps to be previously developed land. It is not clear how this is different to the text in 9.33. No change
Change in Re-Publication Core Strategy
No Change

9.23  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1884
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.23 - paragraph is at risk of misrepresenting the effect of the RSS
What changes required?

Council view
No Change Recommended
Justification
We believe that this is a correct interpretation of RSS
Change in Re-Publication Core Strategy
No Change

9.25  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1885
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.25 & 9.27 cite policy instruments which were adduced at the RSS examination and add nothing to the argument.
What changes required?

Council view
No Change Recommended
Justification
Disagree - These paragraphs simply provide information that we believe justifies the
policy
Change in Re-Publication Core Strategy
No Change

9.25  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1886
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.25 - the second part of paragraph 9.25 is defective as words are missing
What changes required?

Council view
Partly Agree Recommend Change
Justification
Partly agree - the words "..in the region could be constrained by a shortage of... " should be inserted between ‘region and inter-modal freight terminals’. This is a
minor change that can be picked up in minor post-publication changes
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

9.30  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1887
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.30 - the development at Parkside is not justified by its inclusion as an
action in the Local Enterprise Growth Initiative programme.
What changes required?

Council view
No Change Recommended
Justification
Disagree - This is mentioned to illustrate the important role of Parkside in delivering
jobs and other economic benefits to the area. No change.
Change in Re-Publication Core Strategy
No Change

9.33  Paragraph

Respondent  81816  Mr P Sargeant
Representation  CSPUB1888
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraphs 9.33 - 9.34, 9.35 - 9.37 and 9.38 all seem to act against the case for a rail
freight terminal
What changes required?
Council view
Comments Noted
Justification
Noted - although they are just some of the factors that need to be taken into account.
Change in Re-Publication Core Strategy
No Change

9.39 Paragraph

Respondent 81816 Mr P Sargeant
Representation CSPUB1889
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?
Any other comments?
Why considered unsound?
9.39 and 9.40 state details of the 2006 planning application by Astral Developments including that 10,000 jobs will be created but this contradicts the 7,500 stated in paragraph 15.11.
What changes required?

Council view
Agree Recommend Change
Justification
The inconsistency was a mistake but the information based on the Astral proposal was the best information available to us at the time. This has now been superseded by the research undertaken for the Parkside SRFI background paper and paragraphs 9.39 and 9.40 have been deleted.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

9.41 Paragraph

Respondent 81816 Mr P Sargeant
Representation CSPUB1890
Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?
Any other comments?
Why considered unsound?
Paragraph 9.41 is misleading as it indicates the Background Paper contains details of the pending application.
What changes required?

Council view
Partly Agree Recommend Change
Justification
This was not meant to be misleading but it is understood that it could be and this paragraph has now been deleted.
Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

Policy CAS 3.1 Newton-le-Willows and Earlestown Strategy

Respondent 303551 Mr Alex Naughton Policy Officer Merseytravel
Representation CSPUB7
Legally Compliant? Yes Sound? Yes Issue raised before? Yes

If not, why not?

Any other comments?
Policy CAS 3.1 we welcome reference to the Newton le Willows rail / bus interchange proposal at the rail station and associated Park & Ride. This will greatly assist in the sustainable development of housing in the area.

Why considered unsound?

What changes required?

Council view
Comments Noted

Justification
Support Noted

Change in Re-Publication Core Strategy
No Change

Policy CAS 3.1 Newton-le-Willows and Earlestown Strategy

Respondent 374466 Gresham House Plc
Representation CSPUB754

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? No

If not, why not?
GVA Grimley were not retained by the land owner

Any other comments?

Why considered unsound?
Paragraph 9.10 of the Core Strategy Publication Draft states that: “Deacon Trading Estate is currently largely vacant and its use for storage and distribution uses impacts on the local highways network” It goes on to conclude that: “Opportunities to redevelop the Deacon Trading Estate will therefore be explored” Gresham House plc, the owners of the Estate, fully support the Councils assessment of the viability of the Estate and its negative impact on the amenity of the local area. They are working closely with the Council to develop a residential led scheme for the site which will seek to incorporate appropriate employment and commercial floorspace. Given the size of the site (11 ha) it clearly has the potential to deliver a significant number of new dwellings with Earlestown over the next ten years, in a brownfield, sustainable location and one which contributes to the wider urban regeneration aspirations.

What changes required?
We consider therefore that policy CAS 3.1 and the accompanying strategy diagram could better reflect this emerging position as follows: a) Policy CAS 3.1 at section 1 (i) could identify Deacon Trading Estate as a focus for residential development within Newton-le-Willows and Earlestown alongside Vulcan Urban Village at policy section 1 (i). b) Distinguish on the Strategy Diagram between Sankey Valley Industrial Estate (which the Core Strategy identifies as a main focus for industrial activity) and the Deacon Estate, which the Strategy accepts is appropriate for redevelopment. Both changes would provide a level of certainty
and clarity over and about the existing approach.

**Council view**  
No Change Recommended

**Justification**  
The Council does not wish to focus on residential development for this site as it would prejudice delivery of the Earlestown Town Centre AAP.

**Change in Re-Publication Core Strategy**  
No Change

**Policy CAS 3.1 Newton-le-Willows and Earlestown Strategy**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>82085</td>
<td>CSPUB1835</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

**Why considered unsound?**  
In Newton-le-Willows and Earlestown, the Highways Agency would encourage any development of previously developed land in these locations, as the impact upon the SRN should be reduced. This should include the proposals for the Vulcan Urban Village, which has already been reviewed on behalf of the Agency as part of the planning process. Sankey Valley Trading Estate, to the South West of Earlestown is earmarked for the majority of economic development in the area. In general, the Agency would support proposals for development to be promoted in existing, established locations such as here. However, due to its proximity to the motorway network Sankey Valley Trading Estate may impact on the SRN if significant developments go a head. As such, the Agency would insist upon being consulted at the earliest stage of the planning of any development proposals at this location to ensure the safe and efficient operation of the SRN is not compromised.

**What changes required?**

**Council view**  
Comments Noted

**Justification**  
The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network.

**Change in Re-Publication Core Strategy**  
No change

**Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>82123</td>
<td>CSPUB1720</td>
</tr>
</tbody>
</table>

Mr Andrew Stockton  
Vice-Chair Parkside Action Group
Legally Compliant?  Sound?  No  Issue raised before?  Yes

If not, why not?

Any other comments?
Summarised as follows: I object to removal of land from the Green Belt to provide a strategic railfreight terminal for the following reasons: i. it will substantially reduce the safeguards for inappropriate development and the need to demonstrate exceptional circumstances in accordance with PPG2; ii. it is contrary to RSS which only suggests, rather than requires, changes to Green Belt boundaries. If boundaries are to be reviewed it should be on a borough wide basis. Newton-le-Willows will be dominated by warehousing and traffic; iii. consultation is a sham as the views of residents are not taken into consideration; iv. the proposal takes no account of impact on the area, or of the Omega development; v. the proposal takes no account of existing planned development which would satisfy the development need without use of Green Belt land; vi. Removal of Green Belt will have no significant benefits other than revenue. Long terms health impacts will result from increased traffic and pollution. I hope that you will listen to those who live in the borough and pay council tax.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
i. Given the significance of the scheme at a national and regional level it is considered that “exceptional circumstances” exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs

ii. RSS Policy RT8 regarding rail freight is quite clear on the approach to the identification of locations for rail freight interchanges and allows for Green Belt amendments in the case of Parkside under certain circumstances

iii. The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

iv. The Core Strategy is a high level strategic document which establishes principles for developments. It identifies Parkside as a “strategic location”. Any development will as part of its planning application process be assessed against its impact on the surrounding area in detail. The Core Strategy acknowledges that any such development will have an impact by listing criteria that such a scheme will need to address to mitigate against impacts. Similarly this has been assessed at a strategic level through the Sustainability Appraisal. However, without consideration of a detailed scheme we cannot provide additional detail. Omega is a different form of development and is not rail served.

v. A new Background Paper has been prepared which clearly demonstrates that there is enough demand in the North West to require the development of several schemes.

vi. The benefits of any scheme will have to be weighed against the impacts. The site has national and regional significance and it is considered that “exceptional
circumstances” exist in line with PPG2 and this case is outlined in full in the revised Background Paper.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>CAS3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>376199</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1837</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | Issue raised before?  
If not, why not?  
Any other comments?  

Why considered unsound.
I would like my objection to Parkside being removed from the Greenbelt noted. I also cannot support plans put forward by Astral, because I do not believe Network rail have any spare capacity on the railway for any new freight services, so the plans do not add up. I ask that you present my objections to the above when the application goes before the committee.

What changes required?
No change recommended

Council view
Given the significance of the scheme at a national and regional level it is considered that “exceptional circumstances” exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs. We are not aware of any capacity issues and it is unlikely a developer will invest in the scheme without some form of contract to ensure access to the rail network.

Justification

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82611</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1722</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | No | Issue raised before? | Yes  
If not, why not?  

Any other comments?
Summarised as: Parkside is a precious asset to the community which should not be replaced with a huge scar. It should be restored like other colliery sites e.g. Bold. Its removal is contrary to Green Belt policy. Exceptional circumstances have not been demonstrated. Selling off green space is inappropriate and an appalling mistake, depriving the community of natural environment, increasing traffic and air pollution. It is irresponsible to ignore the health concerns expressed by residents. Due consideration has not been given to the impacts on health of the whole community. The Green Belt should be saved as a legacy for generations to come.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The site has national and regional significance strict criteria have been applied to CAS 3.2 to ensure that any proposed scheme will have to demonstrate exceptional circumstances to overcome the current Green Belt designation.

The benefits of any scheme will have to be weighed against the impacts. The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82402 Mr Edward Marcroft</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1723</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before? Yes

If not, why not?

Any other comments?
Summarised as: I support the development of a strategic rail freight interchange for the following reasons: i. the economic and social benefits need to be considered. The Green Belt designation may no longer be appropriate; ii. jobs are desperately needed; iii. improvements to the freight route network will be complemented by improvements to public transport, which might otherwise be delayed. The new HGV access could reduce lorries on local roads; iv. Parkside will: provide jobs; investment; reduce carbon emissions; enhance the environment.

Why considered unsound..

What changes required?

Council view
Comments noted
### Justification

#### Change in Re-Publication Core Strategy
No change required

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>363166  Mr E Marcroft  Secretary Newton Anglers Association</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB1724</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Sound?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Any other comments?**
Summarised as: I support the development of a strategic rail freight interchange for the following reasons: i. the economic and social benefits need to be considered. The Green Belt designation may no longer be appropriate; ii. jobs are desperately needed; iii. improvements to the freight route network will be complemented by improvements to public transport, which might otherwise be delayed. The new HGV access could reduce lorries on local roads; iv. Parkside will: provide jobs; investment; reduce carbon emissions; enhance the environment.

**Why considered unsound?**

**What changes required?**

### Council view
Comments noted

#### Justification

#### Change in Re-Publication Core Strategy
No change required

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>363170  Mr David Kearsley  Principal Planning Officer (Policy)  Wigan Council</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB1725</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Sound?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Issue raised before?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Any other comments?**
Summarised as: There is a lack of recognition of the potential effect of the Parkside proposal on neighbouring authorities. More clarity is needed on the site boundary, and consequent Green Belt change. Our concerns include: a. visual intrusion on the countryside; b. narrowing of Green Belt between St.Helens and Wigan; c. traffic impacts on East Lancashire Road/Lane Head junction. The Core Strategy refers only to the worklessness challenge for St.Helens, with no recognition of the same challenge for neighbouring
authorities.

Why considered unsound?

What changes required?

Council view
Partly Agree Recommend Change

Justification
Further work has been undertaken to assess the potential scale necessary to ensure viability of a scheme. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs. The concerns raised will be considered as part of a detailed scheme.

An Employment Land Study has been prepared, together with a new Background Paper to assess the job creation benefits.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82865 Mr David Pill</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1727</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before?

If not, why not?

Any other comments?
Summarised as: I am dismayed that the Parkside proposal is still included given strong local opposition. Parkside colliery was originally to be returned to agriculture. The proposal not only precludes this but also enlarges the extent of concrete across adjacent arable land, despite world food shortage and predicted flooding as a result of global warming. The proposal will increase existing congestion on the M6 and local roads, exacerbating already poor air quality and endangering the health of local residents. Nationally cancer, heart attacks and asthma are higher in areas of heavy traffic. Noise and light pollution both during construction and when operating, which is believed to exceed European limits, will be detrimental to the health of local residents. Such developments should be restricted to industrial areas or less densely populated areas. The aim of providing work for local people cannot be guaranteed, as opportunities must be open to all EU citizens. Should these opportunities be realised additional housing and social infrastructure will also be required. However, there is a strongly held view that new jobs will be few and will be displaced from existing local firms. Loss of Green Belt, especially in an area with so little open space, is undesirable and should not be promoted. The limitations introduced at para. 9.36 are commendable.

Why considered unsound?

What changes required?
Council view
Partly Agree Recommend Change

Justification
The environmental impacts of development, including noise and light, would be assessed as part of a detailed submission. Policy CAS 3.2 contains strict criteria to ensure that the impacts of future development are mitigated as much as possible. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. An Employment Land Study has been prepared, together with a new Background Paper to assess the job creation benefits.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>363300 Mr Simon Jenkins</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1728</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Not aware</td>
</tr>
<tr>
<td>Why considered unsound..</td>
<td></td>
</tr>
<tr>
<td>What changes required?</td>
<td></td>
</tr>
</tbody>
</table>

Council view
Comments noted

Justification
This representation supports policy CAS 3.2

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
</table>
Respondent 81468  Councillor S Knight
Representation CSPUB1729

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? Yes

If not, why not?

Any other comments?
The wording on the Locational Characteristics should reflect the Council's own position and not the developers.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
A new Background Paper has been prepared independently of the planning application, which identifies the likely scale of such a scheme and the potential impacts on the Green Belt.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent 81474</td>
<td>Councillor B Spencer</td>
</tr>
<tr>
<td>Representation CSPUB1732</td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? Yes

If not, why not?

Any other comments?
Page 58 Locational Characteristics Whilst most of these statements are of a factual nature some seem to be taken from the proposals put forward by Astral Developments without any evidence base for them, they should not be included until firm evidence has been produced to justify their inclusion. I refer specifically to paras 9.2, 9.21 Page 60 Local Context Paras 9.30 & 9.31 are not a strategic objective but just seem to try to justify the development of the freight terminal. Page 61 Site Characteristics Para 9.37 has been taken from the proposal and has not been subject of any appraisal to confirm this is the case. Page 62 Development Considerations Paras 9.39, 9.40 & 9.41 refer to a specific application and not to a strategic objective and makes assumptions particularly to the number of jobs. I would wish to have the above either omitted or re-written

Why considered unsound..

What changes required?
Council view
Partly Agree Recommend Change

Justification
A new Background Paper has been prepared independently of the planning application, which identifies the likely scale of such a scheme and the potential impacts on the Green Belt.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82086 Mr Alan Gauntlett</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1758</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before? No
If not, why not? Not Aware
Any other comments?
There has been over development within Newton-Le-Willows and roads are at capacity. There will be a loss of historic features in the area and the development will have an adverse impact on air quality.

Why considered unsound..

What changes required?

Council view
Comments noted

Justification
The revised CAS 3.2 policy indicates that the site be removed from the Green Belt only where a scheme meets the requirement of the policy, which will have to take account of such issues as: air quality, historic features and archaeology through an Environmental Impact Assessment which would accompany a detailed submission. Further, the policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>83496 Mrs Moria Massey</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1759 Parkside Action Group</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before? Yes
If not, why not?
Any other comments?
The development is based on false benefits to the surrounding area and contrary to PPG2 and regional planning policy. There are no boundaries to prevent Green Belt encroachment and traffic analysis is based on dubious assumptions.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The benefits of the scheme in terms of job creation have been re-evaluated in latest Background Paper. Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity that there is more a definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs.

Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>318644 Mr Brian Merrick</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1760</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Not Aware</td>
</tr>
</tbody>
</table>

Any other comments?
The surrounding roads are unsuitable for Heavy Goods Vehicles. The site has reverted back to nature following closure of Parkside colliery and large areas of Green Belt would be lost beyond the colliery footprint.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Whilst the site may have reverted back to nature to some degree the operational area used for the colliery buildings and spoil heaps is considered previously developed land. Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is more a definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and
Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>318652 Rachel Barnes</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1761</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound? Issue raised before?</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Not Aware</td>
</tr>
<tr>
<td>Any other comments?</td>
<td>The Green Belt boundaries should remain unchanged. The additional traffic and thus pollution would be harmful to the local area.</td>
</tr>
<tr>
<td>Why considered unsound..</td>
<td></td>
</tr>
</tbody>
</table>

What changes required?

Council view
No change recommended

Justification
Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82695 Mr Colin Daniels Warrington Chamber Of Commerce</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1762</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound? Issue raised before?</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Not Aware</td>
</tr>
<tr>
<td>Any other comments?</td>
<td>In support of CAS 3.2. The Rail Freight Interchange would create temporary and permanent jobs in an area of significant deprivation. It would contribute significantly to a reduction in carbon emissions by shifting freight from road to rail and redevelop a derelict colliery.</td>
</tr>
<tr>
<td>Why considered unsound..</td>
<td></td>
</tr>
</tbody>
</table>

Page 79 of 248
What changes required?

Council view
Comments noted

Justification

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Mr James Young</td>
</tr>
<tr>
<td>Representation</td>
<td>Parkside Action Group</td>
</tr>
<tr>
<td>CSPUB1763</td>
<td>82834</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | Issue raised before? |
-------------------|--------|----------------------|
No                 | Yes    | Yes                  |

If not, why not?

Any other comments?
Public opinion was against this option in 2007. PPG2 affords protection to the Green Belt, but this has not been taken into account. If the current plans have yet to be submitted before the committee how can a decision be made at this stage?. The need for rail freight facilities are fulfilled by other completed developments currently in operation.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs.

No decision on the merits of any future planning application has been made – any such application will be assessed at the application stage in accordance with policy CAS 3.2 and other relevant policies.

The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6.
Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82088 Mrs Susan Young Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1764</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound? No Issue raised before? Yes</td>
</tr>
</tbody>
</table>

Any other comments?
Public opinion was against this option in 2007. PPG2 affords protection to the Green Belt, but this has not been taken into account. If the current plans have yet to be submitted before the committee how can a decision be made at this stage?. The need for rail freight facilities are fulfilled by other completed developments currently in operation.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs. No decision on the merits of any future planning application has been made – any such application will be assessed at the application stage in accordance with policy CAS 3.2 and other relevant policies.

The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6.

Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>367107 Mr Andrew Bryce</td>
</tr>
</tbody>
</table>
Representation CSPUB1765

Legally Compliant? Sound? Issue raised before? No

If not, why not?
Not aware

Any other comments?
No objections if the interchange reduces HGV traffic on nearby arterial roads. Concerned about noise and track wear if the access line is from tightly curving spur at Earlestown station.

Why considered unsound..

What changes required?

Council view
Comment noted

Justification
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Some access will have to be via the spur at Earlestown station, although detailed issues such as noise will be dealt with as part of the planning application assessment process.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82463 Mrs Gillian Ashworth Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1766</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before? Yes

If not, why not?

Any other comments?
I object to land being removed from the Green Belt as specified in the policy because:
1 No regard has been given to public opinion expressed at the Issues and Options stage of the LDF in 2007. The Green Belt is important to the environment in two ways. It provides a buffer between the urban sprawl of St.Helens and Warrington and ensures a green breathing space in an Air Quality Management Area.
2 The LDF strategy does not specify the boundary and therefore does not protect the existing Green Belt from future development applications.
3 The decision does not comply with the Regional Planning Policy. A recommendation to review the Parkside Green Belt does not equate to a request to modify it. Regional objectives to protect sites for future rail freight development can be met without the need to remove land from the Green Belt.
4 The LDF strategy in relation to the Parkside Green Belt appears to be based upon a planning application which has yet to be made to the planning committee and therefore whose impact in terms of scale, sustainability and advantage to the area are yet to be assessed.
5 Trafford Park, Port Salford, Ditton and Seaforth are in any event likely to satisfy the regions need for rail freight interchange developments. Therefore the need to remove land from the Green Belt is not compliant with regional policy.
Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs

A new Background Paper has been prepared independently of the planning application which identifies the likely scale of such a scheme and the potential impacts on the Green Belt. Both the Regeneris Employment Land Study and the new Background Paper assess the job creation benefits and disaggregate these to a St Helens level

Policy RT8 regarding rail freight is quite clear on the approach to the identification of locations for rail freight interchanges and allows for Green Belt amendments in the case of Parkside under certain circumstances

The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6

Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81588 Mr G McCann Croft Parish Council</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1767</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?
Not Aware

Any other comments?
The LDF Core Strategy is 'unsound' because:-
1 The decision is not justified because the proposals on Green Belt do not provide sufficient regard to the weight of public opinion expressed on the matter at the Issues and Options stage of the LDF in 2007.
2 The decision is not justified because the policy does not provide an adequate level of protection to existing Green Belt land as currently specified in national planning policy PPG2. The current approach of not specifying a specific boundary will provide insufficient protection and allow developers a free hand on application for land in the future.
3 The decision is not justified because potentially false assumptions are made about the scale of any future development with regard to sustainability and impacts to Green Belt (presumably based on a planning application which has yet to come before committee never mind be approved in its current form). Also assumptions about any potential benefits to
St.Helens are dubious given that Parkside is effectively a shared resource between different Boroughs and the mass conurbations of Manchester and Liverpool.

4 The decision is not compliant with National and Regional policy because the Regional Planning Policy (RSS) recommended ‘a review’ of Parkside Green Belt boundaries and did not explicitly request modification of boundaries. The statement was added at the time to avoid a conflict with other Regional Green Belt policies. Other RSS objectives to protect sites for future rail freight development can be met by suitable LDF policy without the need to remove land from the Green Belt.

5 The decision is not compliant with National and Regional policy because other facilities in the region are likely to have already satisfied the national and regional rail freight interchange requirement e.g. Trafford Park, Ditton, Seaforth and Port Salford. This aspect has not been adequately considered in the LDF.

Why considered unsound...

What changes required?

Council view
Partly Agree Recommend Change

Justification
The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

5 The decision is not compliant with National and Regional policy because other facilities in the region are likely to have already satisfied the national and regional rail freight interchange requirement e.g. Trafford Park, Ditton, Seaforth and Port Salford. This aspect has not been adequately considered in the LDF.

Change in Re-Publication Core Strategy
See revised CAS3.2 and Background Paper

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Mr Andrew Hurst</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1768</td>
</tr>
<tr>
<td>Legally</td>
<td>Sound? No</td>
</tr>
<tr>
<td>Compliant?</td>
<td>Issue raised Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
The development of Green Belt land will set a precedence and lead to urban sprawl around Newton-Le-Willows. It is disappointing to note that St Helens Council has decided to ignore public opinion and are keen to destroy the countryside around Newton-Le-Willows.

Why considered unsound..

What changes required?

Council view
No change recommended

Justification
Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs

The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>317361  Mrs Irene Banks</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1769</td>
</tr>
</tbody>
</table>

Legally Compliant?  Sound?  Issue raised before?
Yes

If not, why not?

Any other comments?
Green Belt land was brought in to safeguard the land, NOT to take large proportions of it for building a terminal when we already have one at Dallam Lane, Warrington. To change the access to the motorway from the existing junction 22 and cause traffic to travel further along the A49 would be a disaster for people living in Winwick or Newton Road, especially when there has been an accident or something on the motorway.

Why considered unsound..

What changes required?

Council view
No Change Recommend
Justification
Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible

Change in Re-Publication Core Strategy
No change recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>367151 Miss Poppy Wilks</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1770</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Yes, with minor changes
Issue raised No before?

If not, why not?
Not aware

Any other comments?
There will be a loss of Green Belt land. Air, noise and light pollution. Impact of more traffic on pedestrian safety.

Why considered unsound..

What changes required?

Council view
No Change Recommend

Justification
Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82550 Mr Steven Broomhead Chief Executive Northwest Regional Development Agency</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1778</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Yes, with minor changes
Issue raised No before?

If not, why not?
Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?
Summarised as follows: Whilst supporting the intention of the policy, feel it is unclear about how it will be taken forward and delivery. Suggested changes: i. Greater clarity is needed
over the potential scale of the development, the policy is vague. ii. Similarly, the extent of the area proposed to be removed from the green belt and safeguarded needs to be made clear. iii. The statement that 'The precise boundaries of any enlarged area will be determined following consideration of a detailed scheme' is contrary to the plan-led system. The wording used at preferred options, regarding NWDA support for designation of a SRFI, should be used in preference to paragraph 9.26. iv. The final paragraph is unnecessary and repeats paragraph 3. The policy should make the following clear: a) an area based principally on the former Parkside Colliery is identified as a suitable location for a Strategic Rail Freight Interchange; b) the full extent of the site will be determined by the need to secure a scheme which is operationally and commercially viable; c) a precise site boundary will be established via the Land Allocations Development Plan Document, which will remove the site from the Green Belt and allocate it for a Strategic Rail Freight Interchange site with the proviso that it is developed only for this use; d) a detailed scheme for a Strategic Rail Freight Interchange will need to satisfy the requirements set out at points 1 - 11 of the current draft policy; e) If an appropriate proposal for a Strategic Rail Freight Interchange cannot be formulated, the future of the site will be reviewed as part of future LDF reviews.

Background paper: Paragraph 4.9 refers to sites within the Regional Economic Strategy as having potential for intermodal freight terminals. This gives a false impression of the number of potentially suitable sites in the region. It is consider that Parkside is one of only two sites in the region with the potential to deliver a suitable scheme.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
The Council acknowledges the weaknesses in the Parkside Policy and has undertaken to produce a new Background Paper providing sufficient detail to meet the weaknesses in the evidence base. As a result of this the Council has rewritten Policy CAS 3.2 to ensure clarity and take account of the new Background Paper.

Change in Re-Publication Core Strategy
Policy CAS 3.2 and justification have been completely rewritten together with a new Background Paper prepared.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315762                             Mrs Dianne Wheatley</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB256</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Issue raised before?</td>
</tr>
<tr>
<td>Any other comments?</td>
<td></td>
</tr>
</tbody>
</table>

Why considered unsound..

We have concerns about the way these policies are currently written, in relation to clarity about what is proposed at Parkside and their justification for it: (i) clarification is needed on what St Helens are proposing here "" are you removing the 54.02ha site from the
Green Belt as shown on the diagram - it is not clear? The text at CSS1(viii) and the third paragraph of policy CAS3.2 seem to imply that land will be removed from the Green Belt at some point in the future once a scheme has been approved. The last paragraph of the reasoned justification states that if no scheme comes forward alternatives will be assessed in the context of the Green Belt designation, as though it is remaining in the Green Belt. However, PPG2 paras 2.6-2.10 make it clear that Green Belt boundaries and revisions to them should be made through the plan making process, and that they should be made to endure. If a scheme is justified by very special circumstances, any Green Belt Review would be in a future Plan Review. The Core Strategy needs to clarify this issue. (ii) even if land is being removed from the Green Belt, the scale is not clear. The Previously Developed Land 54.02ha is referred to at one point, but para 9.21 states that an unidentified enlarged area would be needed; para 9.39 refers to a 272ha planning application, and the Background Paper ‘Parkside Rail Freight Interchange’ para 2.4 refers to it being a strategic location for an SRFI with a size range of 40-400ha. Para 6.12 of the paper also states that the scale and form of any terminal are yet to be decided and would be influenced by the level of development required to fund the associated infrastructure. The Plan needs to set out the scale of the proposal envisaged and set this out within the Core Strategy with justification. (iii) in relation to the exceptional circumstances (PPG2 para 2.7) to justify the proposal if the land is being taken out of the Green Belt, the background paper and the policy Reasoned Justification have some information, but it would be clearer if these exceptional circumstances were set out in one place - the table in the background paper looks at impact on distances between settlements as a result of the proposal, but only uses the 54ha PDL area, when supporting text indicates that it may be much larger. (iv) More needs to be included on delivery and flexibility, and how the proposal will be brought forward: brief details are included at Appendix 1, but these need to be expanded upon for such an important proposal: for example, how will HA and any other concerns be addressed on infrastructure; the strategy seems to rely on the planning application but this proposal isn’t reflected in the plan policy; where will funding come from etc? What will happen if nothing comes forward? Presumably St Helens would change the land back to Green Belt and should say so? Where will detail of the implementation of the proposal be set out ‘SPD, AAP? Is it a strategic location rather than site? If you intend to make it a strategic site in terms of the CS then you have to resolve the boundary issue. How does it relate to Ditton etc? These matters need to be addressed in order to make the policies clear and sound.

What changes required?
Provide clarity on the position on the Green Belt and the site/location and justify it with exceptional circumstances for any land that is removed, indicate appropriate scale of development (and justify it), and provide more information on delivery/implementation.

Council view
Partly Agree Recommended Change

Justification
The Council acknowledges the weaknesses in the Parkside Policy and has undertaken to produce a new Background Paper providing sufficient detail to meet the weaknesses in the evidence base. As a result of this the Council has rewritten Policy CAS 3.2 to ensure clarity and take account of the new Background Paper.

Change in Re-Publication Core Strategy
Policy CAS 3.2 and justification have been completely rewritten together with a new Background Paper prepared.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561 Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal</td>
</tr>
</tbody>
</table>
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment

Any other comments?

The Coal Authority is not objecting to the identification of a Strategic Rail Freight Interchange at the Former Parkside Colliery. However, as could be expected, our records show that there are significant mining legacy issues within the site, including shallow working, mine entries and mine gases.

What changes required?
We would therefore seek additional text at criteria 8 of Policy CAS 3.2 recognising the legacy of mining on the site as follows: “8. Measures for the remediation of land affected by contamination, surface hazards caused by past mining activity, minimisation of environmental impacts..”

Council view
Agree Recommended Change

Justification
The Council considers that this issue needs to be included to ensure the policy is robust.

Change in Re-Publication Core Strategy
Amend criteria 8 (which becomes 9 in the new version) to include “surface hazards caused by past mining activity”

The Highways Agency is currently reviewing a planning application for the Strategic Rail Freight Interchange at the former Parkside Colliery. As this is a live application being reviewed under the existing planning process, it is considered inappropriate for the Agency to comment on the development proposals via this forum.

Notwithstanding this, as stated within our previous response, the Agency would support initiatives which will create a shift of freight from road to rail, provided suitable measures are in place to mitigate any localised impacts of such developments on the SRN.

What changes required?
The Council received 1519 cyclostyled forms in relation to CAS 3.2. The content of the form is set out below with the Council’s response in bold italics beneath each point. A list of those submitting a cyclostyled form is included at appendix 1.

I object to land being removed from the Green Belt as specified in the above policy. Green Belt boundaries should remain unchanged. The LDF Core Strategy is 'unsound' because:-

a) The decision is not justified because the proposals on Green Belt do not provide sufficient regard to the weight of public opinion expressed on the matter at the Issues & Options stage of the LDF in 2007.

The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

b) The decision is not justified because the policy does not provide an adequate level of protection to existing Green Belt land as currently specified in national planning policy PPG2. The current approach of not specifying a specific boundary will provide insufficient protection and allow developers a free hand on application for land in the future.

Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs

c) The decision is not justified because potentially false assumptions are made about the scale of any future development with regards sustainability and impacts to Green Belt (presumably based on a planning application that has yet to come before committee, never mind be approved in its current form). Also assumptions about any potential benefits to St Helens are dubious given that Parkside is effectively a shared resource between different boroughs and the mass conurbations of Manchester and Liverpool.

A new Background Paper has been prepared independently of the planning application which identifies the likely scale of such a scheme and the potential impacts on the Green Belt. Both the Regeneris Employment Land Study and the new Background Paper assess the job creation benefits and disaggregate these to a St Helens level

d) The decision is not compliant with National and Regional policy because the Regional Planning Policy (RSS) recommended ‘a review’ of Parkside Green belt boundaries and did not explicitly request modification of boundaries. The statement was added at the time to avoid a conflict with other Regional Green Belt policies. Other RSS objectives to protect sites
for future rail freight development can be met by suitable LDF policy without the need to remove land from the Green Belt.

*Policy RT8 regarding rail freight is quite clear on the approach to the identification of locations for rail freight interchanges and allows for Green Belt amendments in the case of Parkside under certain circumstances*

e) The decision is not compliant with National and Regional policy because other facilities in the region are likely to have already satisfied the national and regional rail freight interchange requirement e.g. Trafford Park, Ditton, Seaforth, and Port Salford. This aspect has not been adequately considered in the LDF.

*The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6*

In addition to the issues raised above, several additional points were attached to the cyclostyled form that require a response. A full list of additional points made is attached at Appendix 2, however, the main additional issues that are not addressed as part of the cyclostyled responses are:

<table>
<thead>
<tr>
<th>Issue</th>
<th>Council Response</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.</td>
<td></td>
</tr>
<tr>
<td>Impact on Highways</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
<td></td>
</tr>
</tbody>
</table>

The Council received 40 representations on cyclostyled forms after the consultation closure date. Whilst these representations are invalid they raised the same issues detailed above. A list of those submitting cyclostyled representations received after the closure date is included at appendix 3.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1782</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No Sound? No  Issue raised Yes before?</td>
</tr>
</tbody>
</table>

If not, why not?

**Any other comments?**

Summarised as:

All RFI references should be generic and conditional rather than being based on one particular proposed implementation which has not yet been approved and it's outcome uncertain i.e. "How would the LDF be positioned if say a different smaller RFI were implemented at Parkside?"

**Why considered unsound?**

See representations
What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
A new Background Paper has been prepared which identifies the likely scale needed for a scheme to be viable. This has been reflected in changes to the policy.

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1783</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Summarised as: The Core Strategy misinterprets RSS policy with regard to Parkside specifically: Parkside should be protected from development other than a RFI; and Green Belt boundaries should remain unaltered.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
RSS Policy RT8 regarding rail freight is quite clear on the approach to the identification of locations for rail freight interchanges and allows for Green Belt amendments in the case of Parkside where exceptional circumstances are demonstrated.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1784</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Summarised as: In effect CAS 3.2 proposes to replace existing Green Belt ‘special circumstance’ safeguards around Parkside with a set of conditions related to the provision of an RFI. This principle would only be effective if the conditions met the terms of ‘special
circumstances’ as defined in PPG2. Such conditions need to be proposal specific to assess the particular implications of that scheme. However, as the LDF needs to be flexible, it cannot guarantee protection of the Green Belt in all circumstances e.g. the impact of scope and size on erosion of land between conurbations. The proposed policy in CAS 3.2 to a large extent places a developer in the driving seat, rather than having to justify why land in the Green Belt should be developed on. This is clearly not acceptable.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
Given the significance of the scheme at a national and regional level it is considered that "exceptional circumstances" exist in line with PPG2 and this case is outlined in full in the revised Background Paper. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs and are dependent on an appropriate scheme gaining planning permission.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1785</td>
</tr>
</tbody>
</table>

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
Summarised as: The Core Strategy is not legally compliant with EU Directive 97/11/EC as the SEA does not cover project which may affect the environment.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
There seems to have been a misinterpretation of the Regulations. The assessment of the Core Strategy is only required to demonstrate compliance with the SEA Directive 2001/42/EC not the "EIA" Directive which applies to development planning applications at project level. Annex I & II of EU 97/11/EC will be applicable at application stage.

Change in Re-Publication Core Strategy
No Change Recommended

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former
Any other comments?
The decision is not compliant with National & Regional policy because other facilities in the region are likely to have already satisfied the national & regional rail freight interchange requirement e.g. Trafford Park, Ditton, Seaforth, Birkenhead, Port Wirral, Port Warrington and Port Salford. This aspect has not been adequately considered in the LDF.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6.

Change in Re-Publication Core Strategy
No Change Recommended

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Any other comments?
The Core Strategy is not effective because the Parkside background paper contains grammatical errors that in some cases make the narrative incomprehensible.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.
Change in Re-Publication Core Strategy
The Background Paper has been amended.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Mr Dave Tyas 82174 Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1788</td>
</tr>
</tbody>
</table>

Legally Compliant? No  
Sound? No  
Issue raised before? Yes

If not, why not?

Any other comments?
The Core Strategy is not justified because the proposals on Green Belt in CAS 3.2 do not provide sufficient regard to the weight of public opinion expressed on the matter at the Issues & Options stage of the LDF in 2007.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The weight of public opinion is one material consideration in a number of considerations the Council needs to take into account. The concerns raised by people have led to the Policy placing strict criteria on any such development to ensure that any impacts of such a development are mitigated as much as possible. The scheme, however, is given significant status at a national and regional level and the Core Strategy must reflect this.

Change in Re-Publication Core Strategy
Revised policy CAS 3.2

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Mr Dave Tyas 82174 Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1789</td>
</tr>
</tbody>
</table>

Legally Compliant? No  
Sound? No  
Issue raised before? Yes

If not, why not?

Any other comments?
The Core Strategy is not consistent with National or Regional Policy. An assumption is made that changes to Green Belt boundaries must be specified in policy, whereas the RSS only recommended a review is made. The Core Strategy could for instance state that a review was undertaken and for the reasons highlighted in this document, no changes to boundaries were deemed appropriate at this time.

Why considered unsound?
See representations

What changes required?
See representations
Council view
No Change Recommended

Justification
Policy RT8 regarding rail freight is quite clear on the approach to the identification of locations for rail freight interchanges and allows for Green Belt amendments in the case of Parkside under exceptional circumstances.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1790</td>
</tr>
</tbody>
</table>

Legally Compliant? No  Sound? No  Issue raised before? Yes

If not, why not?

Any other comments?
In the St Helens UDP (v2) page 188 para 6.2 it implies the size of the site is 34ha, whereas CAS 3.2 quotes the size as 54.02ha?

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The former colliery site and associated colliery spoil occupied approximately 54 hectares. Future proposals will be determined following consideration of a detailed scheme. The new Background Paper provides evidence on likely scale of land take required for such a scheme.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1791</td>
</tr>
</tbody>
</table>

Legally Compliant? No  Sound? No  Issue raised before? Yes

If not, why not?

Any other comments?
This paragraph establishes the term 'the site' and implies its area is 54.02 ha. Paragraph 3 goes on to say 'the site will be removed from the Green Belt ..' Paragraph 4 discusses the approach for an enlarged area. The term 'site' is therefore ambiguous and needs tightening. The position with regards PPG2 is not covered.

Why considered unsound?
See representations

**What changes required?**
See representations

**Council view**
Partly Agree Recommend Change

**Justification**
The precise boundaries of the site and any enlarged area will be determined following consideration of a detailed scheme. The revised CAS 3.2 indicates that the site will be removed from the Green Belt only where a scheme meets the requirements of the policy and that the site will only be developed as a Strategic Rail Freight Interchange and for no other form of development. The new Background Paper provides evidence on likely scale of land take required for such a scheme

**Change in Re-Publication Core Strategy**
See revised policy CAS 3.2.

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1792</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
</tbody>
</table>

**Any other comments?**
The A572 and A579 are omitted and need to be included. If omitted HGV & LGV vehicles would be allowed to enter from the north and east using the local road infrastructure. Suggest replacement of this condition with: Access to any potential development on the site by HGV, LGV and other commercial vehicles must not make use of the A49, A573, A572 and A579. Evidence of how this will be legally enforced will need to be produced.

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Agree Recommend Change

**Justification**
The intention of the policy is to restrict use of the local road network. In order to include all surrounding roads rather than those named the policy could refer to Traffic Sensitive Routes identified in the Network Management Plan.

**Change in Re-Publication Core Strategy**
CAS 3.2 (2) Direct access to the site from the M6 for HGVs can be obtained avoiding use of the A49 and A573 **Traffic Sensitive Routes identified in the Network Management Plan**

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1793</td>
</tr>
</tbody>
</table>
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?

Any other comments?
The word ‘unacceptable’ needs qualifying.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
Terms such as unacceptable are used for brevity. The justification is not the appropriate place to provide detail of how impact would be assessed.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174  Mr Dave Tyas  Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1794</td>
</tr>
</tbody>
</table>

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?

Any other comments?
The word ‘unacceptable’ needs qualifying.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
Terms such as unacceptable are used for brevity. The justification is not the appropriate place to provide detail of how impact would be assessed.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174  Mr Dave Tyas  Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1795</td>
</tr>
</tbody>
</table>

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes
If not, why not?

Any other comments?
This condition does not adequately protect the location from unsuitable development. The essential consideration here is what should happen and what actually will happen. The wording should be ‘All uses within the site must have the prime purpose...’ An additional condition and sentence should be added “tenants will not be allowed to occupy premises without evidence that they intend to meet the prime purpose”. An additional condition should be added ‘waste must not be imported to the site’.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The policy must be sufficiently flexible to deal with all eventualities.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1796</td>
</tr>
</tbody>
</table>

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
Section 9.34 of CAS3.2 provides stronger words about the landscape to the East of the site than detailed in this condition. The words here should reflect and be consistent with the emphasis in 9.34.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The reasoning included at 9.34 is justification for the requirement contained in (7). It would be inappropriate to include justification in the policy.

Change in Re-Publication Core Strategy
No Change Recommended

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
</tbody>
</table>
Representation CSPUB1797

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
Typo - ;and at the end of the paragraph.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
It is considered correct to include ‘and’ before the last item in a list of criteria.

Change in Re-Publication Core Strategy
No Change Recommended

Policy CAS 3.2 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
Suggest ‘.. in the context of the Green Belt designation’, should say ‘.. in the context of the Green Belt designation as detailed in the proposals map’

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The additional wording is considered unnecessary.

Change in Re-Publication Core Strategy
No Change Recommended

Paragraph 9.21 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification

Change in Re-Publication Core Strategy
No Change Recommended
Legally Compliant? No  Sound? No  Issue raised before? Yes

If not, why not?

Any other comments?
See I1 for question on size of site (54ha?) - Also the document uses 54ha rather than 54.02ha elsewhere. Inaccuracies on the bullets: i) The previous Rail Track RFI application in 2001 was based entirely on land to the West of the M6 and a proposed link road to the existing M6 J22. Therefore it is incorrect to suggest that an enlarged area to the East would be required to secure access to the M6. ii) SES Volume 1 section 2.2.2 details information of 770m sidings to be provided on the West of the development. Therefore it is incorrect to say an enlarged area would be required to the East to accommodate the length of trains within the site. (Note too 770m length trains are only an aspiration of the industry currently as the rail infrastructure does not have the passing loops or signalling end to end on the network to support this length of train. Recent expansion at Ditton RFI installed 550m sidings perhaps indicating a lack of confidence in 770m network capability?). iii) In Astral’s plan an enlarged area to the East is proposed for further warehousing, but the proposal also includes warehouses to the West of the M6 that are larger than anything else constructed in the UK, and footprint that is larger than any other RFI in Europe. Therefore the suggestion that an enlarged area would be required to meet RFI warehouse demand appears difficult to believe.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
A new Background Paper has been prepared which identifies the likely scale needed for a scheme to be viable. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. The new Background Paper provides evidence on likely scale of land take required for such a scheme.

Change in Re-Publication Core Strategy
Revisions made to CAS 3.2 and justification.

<table>
<thead>
<tr>
<th>Paragraph 9.23</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>CSPUB1800 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Note the word ‘review’, not ‘remove’. The broad location can still be protected by appropriate policy as per the 11 conditions in CAS 3.2.

Why considered unsound?
See representations

What changes required?
See representations
Change in Re-Publication Core Strategy
No Change

Paragraph 9.25  Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent  82174  Mr Dave Tyas  Secretary Parkside Action Group
Representation  CSPUB1801

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?

Any other comments?
‘... close to the major origins and destinations of freight in the North West’. The Parkside site is not close to any major origin or destination. Every single item of freight would have to arrive and leave by road and travel by road significant distances to/from Parkside. There is likely to be no net HGV freight saving to the North West. Any HGV saving will be relative the South of the UK outside the North West region. The Regional Freight Strategy promotes the concept of domestic rail freight movements between UK RFI but in practice this concept has not gained any momentum due to the relatively small distances involved in the UK and relative cost (both in time and money) of road to rail logistics compared to road only over short distances (not due to the lack of available RFID).

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of several schemes. Parkside is in a strategic position and has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6

Change in Re-Publication Core Strategy
See revised CAS 3.2 and Background Paper

Paragraph 9.26  Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent  82174  Mr Dave Tyas  Secretary Parkside Action Group
Representation  CSPUB1802

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

If not, why not?

Any other comments?
It is likely that the North West future requirement has already been met by the proposed or
existing facilities at Ditton, Trafford Park, Birkenhead, Seaforth, Port Wirral, Port Warrington and Port Salford.

Why considered unsound?  
See representations

What changes required?  
See representations

Council view  
No Change Recommended

Justification  
The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of all identified schemes. Parkside has additional locational advantages to the other schemes due its location on the West Coast Main Rail Line, the Liverpool to Manchester Rail Line and the M6

Change in Re-Publication Core Strategy  
No Change Recommended

<table>
<thead>
<tr>
<th>Paragraph 9.32</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1803</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No Sound? No</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?  
TP47 section 5.11 details that a projected 136,000 sq m of additional warehousing that will be required by St Helens between 2006 and 2025. The Astral proposal aims to provide 715,000 sq m of warehousing. This represents over five times the St Helens requirement over a 20 year period. Given the scale of warehousing proposed, it is highly likely that Astral's business plan will focus on acquiring existing logistics and distribution businesses, in turn implying job relocation. The net effect would be detrimental to other boroughs. West Lancashire District Council has already objected to the Astral scheme on these grounds.

Why considered unsound?  
See representations

What changes required?  
See representations

Council view  
Partly Agree Recommend Change

Justification  
The Rail Freight Interchange would be a strategic facility. It is not intended to serve St.Helens alone. The submitted application is currently being re-evaluated with the possibility of a reduced floorspace.

Change in Re-Publication Core Strategy  
See revised policy CAS 3.2 and Background Paper.

<table>
<thead>
<tr>
<th>Paragraph 9.35</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
</table>
Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group
Representation CSPUB1804

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
Good point, but neither should other possible entry points be acceptable e.g. via the A573 from either direction.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Comment noted

Justification
Criteria 3 & 4 of revised policy CAS 3.2 address this issue.

Change in Re-Publication Core Strategy
No change

Paragraph 9.36 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group
Representation CSPUB1805

Legally Compliant? No Sound? No Issue raised before? Yes

If not, why not?

Any other comments?
What about the A49 and A572? Is there a presumption here about access to the site and roads most likely to be impacted? The likelihood is that all local roads around the site will be impacted in some way or other. Picking just two of them appears to be flawed.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
Criteria 3 & 4 of revised policy CAS 3.2 address this issue

Change in Re-Publication Core Strategy
No change

Paragraph 9.37 Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group
Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

Any other comments?
Should state that Manchester - Liverpool commuter rail traffic may be impacted.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
This would be an unnecessary addition.

Change in Re-Publication Core Strategy
No change

Paragraph 9.38  Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent  82174  Mr Dave Tyas  Secretary Parkside Action Group
Representation  CSPUB1807

Legally Compliant?  No  Sound?  No  Issue raised before?  Yes

Any other comments?
Point (ii) ‘.. of the proposed application site boundary’ - what application? The LDF should not be presumptuous about a particular application. With this in mind surely it is impossible to specify distance from a boundary.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Comment Noted

Justification
The justification has been reworded to reflect the additional work undertaken. This statement has been removed.

Change in Re-Publication Core Strategy
No change

Paragraph 9.39  Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent  82174  Mr Dave Tyas  Secretary Parkside Action Group
Representation  CSPUB1808
Legally Compliant? No
Sound? No
Issue raised before? Yes

Legally Compliant? No
Sound? No
Issue raised before? Yes

Any other comments?
Need to be specific on source of job estimates e.g. ‘The developer estimates ..’ The current statement implies a prediction from the LDF itself.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The justification has been reworded to reflect the additional work undertaken. This statement has been amended based on the findings of the report.

Change in Re-Publication Core Strategy
The justification of the revised Policy CAS 3.2 now reads. The site has the potential to provide approximately 7,750 new jobs.

Background Paper
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent: Mr Dave Tyas
Representation: Secretary Parkside Action Group

Legally Compliant? No
Sound? No
Issue raised before? Yes

Legally Compliant? No
Sound? No
Issue raised before? Yes

Any other comments?
The photograph on the front page is extremely old and presents a false picture of the site today. It misleads the reader into thinking the site is essentially brown-field. Much of the hard standing area is now overgrown and has returned to its natural Greenfield appearance. The grade II agricultural land to the East of the M6 is hardly visible, but yet this land represents approximately 50% of the area present in the Astral proposal.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

Change in Re-Publication Core Strategy
New Background Paper Prepared

Background Paper
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery
Legally Compliant? No  Sound? No  Issue raised Yes
If not, why not?

Any other comments?
Need to be clear on scope of area 34ha - 52ha (or 52.02ha) is used extensively in CAS 3.2.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

Change in Re-Publication Core Strategy
New Background Paper prepared.

Legally Compliant? No  Sound? No  Issue raised Yes
If not, why not?

Any other comments?
‘.. the green belt maintains its five functions and the degree of permanence’ ““ what does this mean?

Why considered unsound?
See representations

What changes required?
See representations

Council view
No change recommended

Justification
The extract is taken from a paragraph describing what the key considerations would be in allocating the former Parkside Colliery as a Strategic Rail Freight Terminal. The five functions are those described in PPG2 paragraph. 1.5.

Change in Re-Publication Core Strategy
No change recommended.
### Background Paper 3.4

**Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Mr Dave Tyas</th>
<th>Secretary Parkside Action Group</th>
</tr>
</thead>
</table>

**Legally Compliant?** No  
**Sound?** No  
**Issue raised before?** Yes

**If not, why not?**

**Any other comments?**
How does moving freight reduce the need to travel (by car)?

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
No change recommended

**Justification**
The extract is taken from a paragraph describing how local authorities should help secure the fullest possible use of sustainable transport for the movement of freight, amongst other actions, which overall reduce the need to travel. The addendum ‘especially by car’ is more pertinent to other actions.

**Change in Re-Publication Core Strategy**
No change

### Background Paper 3.5-3.8

**Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Mr Dave Tyas</th>
<th>Secretary Parkside Action Group</th>
</tr>
</thead>
</table>

**Legally Compliant?** No  
**Sound?** No  
**Issue raised before?** Yes

**If not, why not?**

**Any other comments?**
Not clear why specific paragraphs from PPG2 are referenced and others omitted? What point is being made here?

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Comment Noted

**Justification**
The paragraphs referred to are setting the National Context in which proposals must be considered.

**Change in Re-Publication Core Strategy**
No change
The concept of moving domestic freight by rail between UK RFI has not gained any momentum over previous years. This is due to the relatively small distances involved in the UK and associated costs (both time and money) of road to rail compared to road only logistics. Evidence exists to show that companies have little appetite for moving freight by rail over short distances. A strategy of a network of RFI to promote removal of HGVs from roads is therefore flawed. No detailed study of future North West freight requirements exists today. North West Regional planning groups appear to pursue a ‘just in case’ approach of promoting as many RFI as possible in whatever form even if they are not potentially needed when compared to existing freight handling capabilities in the region. A ‘just in case’ approach does not support the case for disposition of huge areas of Green Belt from the region. Note the Dft Rail Utilisation Strategies (RUS) do not have sufficient detail to assess North West RFI requirements. What is actually needed is a study to discover what future types of freight and associated processing are required in the North West (including rail served warehousing). Such a study may show that the North West already has sufficient rail freight handling capability (existing or in the pipeline) to meet the North West requirement without Parkside.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The provision of SRFI has much support at a national and regional level. The new Background Paper clearly demonstrates that there is enough demand in the North West to require the development of several schemes.

Change in Re-Publication Core Strategy
No change
The document is available as guidance. To suggest that the document is available as an oversight or mistake would need to be substantiated.

Change in Re-Publication Core Strategy
No change

Any other comments?
".. carrying some 43% of UK rail freight and serving the West Midlands, the North West and Scotland." - What type of freight is this referring to? A major proportion of rail freight is bulk freight (aggregates etc). It is fairly common for rail literature to include bulk freight in their statistics to overinflate importance of freight transport in relation to RFI which only have non-bulk capability.

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

Change in Re-Publication Core Strategy
No change

Any other comments?
".. carrying some 43% of UK rail freight and serving the West Midlands, the North West and Scotland." - What type of freight is this referring to? A major proportion of rail freight is bulk freight (aggregates etc). It is fairly common for rail literature to include bulk freight in their statistics to overinflate importance of freight transport in relation to RFI which only have non-bulk capability.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

Change in Re-Publication Core Strategy
No change
Any other comments?

‘The WCML Strategy identifies provision of capacity for up to 60-70% more trunk freight paths ...’ Although the WCML has recently completed a major upgrade program, effective capacity has been increased only in discrete locations. For example some sections of track in the midlands have been upgraded from two to four tracks. Some sections of track have had little or no modification as part of the programme. An example of a two track section of track is that located near Weaver junction just south of Warrington. This means the effective capacity is limited at this point despite the WCML upgrade. Network Rail has aspirations to improve the working time table (WTT) to increase rail paths, but this is unproven. In the end squeezing more trains into the same time period increases risks and has the potential to impact the schedules for commuter services. Virgin Trains are placing extreme pressure on freight paths due to increased passenger demands and clearly specified efficiency objectives. Because passenger trains run significantly faster than freight trains, any increase in passenger services has a high impact on freight paths (passenger traffic can’t wait for slower freight trains and passing loops are limited - virtually non-existent for 770m trains!).

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Background Paper 3.11(vii)</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1818</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Agreed, but it identifies possible locations; it does not state specific or all locations have to be developed in order to meet the requirement.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Comment Noted

Justification

Change in Re-Publication Core Strategy
No change
Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group
Representation CSPUB1819

Legally Compliant? No Sound? No Issue raised before? Yes
If not, why not?

Any other comments?
Possible typo ‘part’- should this be port? A large proportion of inter-continental container freight is too large to carry on the UK rail network (requires W12 gauge - WCML only cleared to W10). This would include much of the freight to be imported at the new facility at Seaforth in Liverpool for instance.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

Justification
Bullet point x should read ‘port’ and not ‘part’. Such detail would be considered by a developer and evaluated as part of a subsequent application.

Change in Re-Publication Core Strategy
See Revised CAS 3.2 and Background Paper.

Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery

Respondent 82174 Mr Dave Tyas Secretary Parkside Action Group
Representation CSPUB1820

Legally Compliant? No Sound? No Issue raised before? Yes
If not, why not?

Any other comments?
‘Local Development Framework may provide for detailed changes in Green Belt’ The operative word here is may not must.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Comment noted

Justification

Change in Re-Publication Core Strategy
The aspirations of the Northern Way are to promote the concept of East to West freight movements. The use of rail to achieve this goal is severely constrained by the fact that the trans-Pennine route is not cleared to W10 gauge (currently W8). This means that all Trans-Pennine container traffic needs to use special ‘well’ Wagons which are costly to operate and not attractive to freight operators. The limitations of the Trans-Pennine rail route are not generally recognised.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Comments noted

Justification
Such detail would be considered by a developer and evaluated as part of a subsequent application.

Change in Re-Publication Core Strategy
No change
Such detail would be considered by a developer and evaluated as part of a subsequent application.

Change in Re-Publication Core Strategy
See revised Background Paper

<table>
<thead>
<tr>
<th>Background Paper 6.4</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr Dave Tyas</td>
</tr>
<tr>
<td></td>
<td>Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
Poor grammar again in this paragraph. In fact with respect to the Newton Park farm inquiry the Secretary of State refused the application on grounds of Green Belt and not being totally convinced that an alternative coexistence approach as proposed by PAG would prejudice a future RFI. So in this respect why on earth is this paragraph referring to 'Junction 22 MSA'? What is an MSA?

Why considered unsound?
See representations

What changes required?
See representations

Council view
No Change Recommended

Justification
There appears to be confusion over paragraph 6.4 relating to the bullet point below rather than the one above. MSA refers to a Motorway Service Area.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Background Paper 6.5</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174</td>
</tr>
<tr>
<td>Representation</td>
<td>Mr Dave Tyas</td>
</tr>
<tr>
<td></td>
<td>Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?
No - that is not the precise wording in the Inspectors report. Please quote the wording as stated there in and not an interpretation; otherwise you are misleading the reader.

Why considered unsound?
See representations

What changes required?
See representations

Council view
Partly Agree Recommend Change

**Justification**
The statement was not intended to mislead the reader, only to summarise the intention of the decision.

**Change in Re-Publication Core Strategy**
See Revised Background Paper

<table>
<thead>
<tr>
<th>Background Paper 6.7</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td><strong>Mr Dave Tyas</strong> 82174 Secretary Parkside Action Group CSPUB1825</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td><strong>No</strong>  Sound? <strong>No</strong> Issue raised before? <strong>Yes</strong></td>
</tr>
</tbody>
</table>

**If not, why not?**

**Any other comments?**
*Inter-modal freight changes’??? Surely a typo?*

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Agree Recommend Change

**Justification**
The word changes is incorrect in this context.

**Change in Re-Publication Core Strategy**
See revised Background Paper

<table>
<thead>
<tr>
<th>Background Paper 6.8</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td><strong>Mr Dave Tyas</strong> 82174 Secretary Parkside Action Group CSPUB1826</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td><strong>No</strong>  Sound? <strong>No</strong> Issue raised before? <strong>Yes</strong></td>
</tr>
</tbody>
</table>

**If not, why not?**

**Any other comments?**
This table is particularly irritating. What precise distance is being measured from where to where? What assumptions are being made about the amount of Green Belt removal at Parkside and boundary position? The table is confusing. It is obvious that if 272ha as specified by the Astral proposal is removed from the Green Belt at Parkside, the amount of green separation between Newton-le-Willows, Hermitage Green, Winwick, and Croft will be severely reduced. Section 3.7 quotes from PPG2, which states that Green Belts should be several miles wide.

**Why considered unsound?**
See representations

**What changes required?**
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

**Change in Re-Publication Core Strategy**
See revised Background Paper

<table>
<thead>
<tr>
<th>Background Paper</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
</table>
| Respondent       | Mr Dave Tyas  
| Representation   | Secretary Parkside Action Group |

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Any other comments?**
Given that Parkside lies to the south east of Newton-le-Willows and Haydock lies on the other side to the north west, how would removing land from the Green Belt at Parkside impact any green separation between Haydock and Newton-le-Willows? Perhaps the author is trying to make the point that areas of green separation in the borough vary? So what!?

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Comment noted

**Justification**

<table>
<thead>
<tr>
<th>Background Paper</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
</table>
| Respondent       | Mr Dave Tyas  
| Representation   | Secretary Parkside Action Group |

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Any other comments?**
Horrendous grammar again (not comprehensible) - really not sure what points are being made here.

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Comment noted

**Justification**
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

**Change in Re-Publication Core Strategy**
See revised Background Paper.

<table>
<thead>
<tr>
<th>Background Paper 6.12</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1829</td>
</tr>
<tr>
<td>Mr Dave Tyas</td>
<td>Secretary Parkside Action Group</td>
</tr>
</tbody>
</table>

**Legally Compliant?**  No  **Sound?**  No  **Issue raised before?**  Yes

If not, why not?

**Any other comments?**
Can we infer from this statement that the amount of Green Belt de-allocation will be directly proportional to the amount of land a developer needs to cover any infrastructure costs? We would challenge this argument under the terms of the ‘special circumstances’ of PPG2?

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Partly Agree Recommend Change

**Justification**
Further work has been undertaken to assess the potential scale necessary to ensure viability of a scheme. Some changes have been made to the policy to ensure clarity and that there is a more definitive position regarding scale and hence land take. Firm boundaries are deferred to the Allocations and Proposals Map DPDs

**Change in Re-Publication Core Strategy**
See revised CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>Background Paper 7.3</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1830</td>
</tr>
<tr>
<td>Mr Dave Tyas</td>
<td>Secretary Parkside Action Group</td>
</tr>
</tbody>
</table>

**Legally Compliant?**  No  **Sound?**  No  **Issue raised before?**  Yes

If not, why not?

**Any other comments?**
There is an open bracket in this paragraph but no close bracket?

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Comment noted

**Justification**
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

**Change in Re-Publication Core Strategy**
See revised Background Paper

<table>
<thead>
<tr>
<th>Background Paper 8.1</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82174 Mr Dave Tyas Secretary Parkside Action Group</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1831</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>No</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**If not, why not?**

**Any other comments?**
PAG Summary:
- The document contains many areas of poor grammar to a point where some sections are incomprehensible.
- The document does not separate the issue of site protection and Green Belt de-allocation. In fact it infers the two are inseparably linked as specified in the RSS. This is incorrect.
- The document does not adequately justify why an area of land to the east of the M6 would be required to make an RFI viable.

**Why considered unsound?**
See representations

**What changes required?**
See representations

**Council view**
Comment noted

**Justification**
The Council acknowledge the weakness of the previous Background Paper and will be issuing a new Background Paper which deals with these issues.

**Change in Re-Publication Core Strategy**
See revised policy CAS 3.2 and Background Paper

<table>
<thead>
<tr>
<th>9.33</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561 Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB859</td>
</tr>
</tbody>
</table>
Legally Compliant?  Yes   Sound?  No   Issue raised before?  No

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment

Any other comments?

Why considered unsound?
The Local Authority should also consider the addition of an explanatory paragraph in the “Site Characteristics” section that follows Policy CAS 3.2 (Paras. 9.33 to 9.38), expanding upon the issue of mining legacy and public safety at the site.

What changes required?
We would recommend wording as follows: "Mining activity at the former Parkside Colliery has left a legacy of issues that need to be addressed in order to ensure public safety of the rail freight interchange. Potential instability of land and surface hazards on the site, such as mine entries should be addressed to the satisfaction of the Local Authority and the Coal Authority before the rail freight interchange is developed."

Council view
No change recommended

Justification
This matter is too detailed for the Core Strategy and will be dealt with at the planning application stage. Also, policy CP1 3 (iv) has been amended in response to CSPUB854 and will require land stability to be addressed.

Change in Re-Publication Core Strategy
No change
Chapter 10 – Haydock and Blackbrook

Policy CAS 4 – Haydock & Blackbrook Strategy

Respondent: 223810 Mr Jonathan Burns
DPP Planning Consultancy

Representation: CSPUB1854

Legally Compliant? Yes Sound? Yes, with minor changes

Issue raised before? Yes

If not, why not?

Any other comments?

The boundary for Clipsley Lane Local centre should be reconsidered to include the now trading Tesco. Support approach to undertake further work as part of the Allocations DPD. Flexibility should be maintained in CAS 4 to review elements of the hierarchy through Allocations DPD, in particular to review District Centre allocations in the context of Haydock which would benefit from the designation of a district centre.

What changes required?

Council view

No Change Recommended

Justification

The approach proposed in Policy CAS 4 has been changed. The Policy now indicates that any future changes in designation will be made as a revision to the Core Strategy, rather than through an Allocations DPD. Change in Re-Publication Core Strategy

No change

Reason for change: On further examination of the covering letter submitted, additional points were discovered that had not been included on the submitted representation form.

Policy CAS 4 – Haydock & Blackbrook Strategy

Respondent: 303551 Mr Alex Naughton Policy Officer Merseytravel

Representation: CSPUB8

Legally Compliant? Yes Sound? Yes

Issue raised before? Yes

If not, why not?

Any other comments?

The Haydock industrial areas need to be integrated into the public transport network to improve accessibility for workers and encourage sustainability. The development plan policies must ensure that all new development and changes of uses make provision for public transport, given that the Haydock Industrial Estate is poorly served by public transport, being located just off J23 on the M6. We need to see more initiatives like the successful No 920 bus introduced in partnership with St Helens Council, the St Helens Chamber of Commerce and Arriva to link St Helens and Haydock Industrial Estate. This was introduced in February 2007 and has helped improve access to this key employment location and improve recruitment and retention of staff for businesses on the industrial estate. All this in turn links with the requirement for Travel Plans highlighted as part of the Transport SPD.

Why considered unsound?
What changes required?

Council view
Comment noted

Justification
The Ensuring Choice of Travel SPD will require Travel plans where appropriate.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CAS 4</th>
<th>Haydock &amp; Blackbrook Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491 Miss Lesley Bye</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB733 Contaminated Land Team Leader Merseyside Environmental Advisory Service</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes
If not, why not?

Any other comments?
We suggest amending the policy wording as follows: Part 6, point iii add “and at Wagon Lane”

Why considered unsound?

What changes required?

Council view
No Change Recommended

Justification
Not required because Wagon Lane is considered to be part of the Sankey Valley Country Park.

Change in Re-Publication Core Strategy
No changes required.

<table>
<thead>
<tr>
<th>Policy CAS 4</th>
<th>Haydock &amp; Blackbrook Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82085 Ms Lisa Henderson</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1838 LDF Manager Highways Agency</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? Issue raised before?
If not, why not?

Any other comments?
The Highways Agency, in general, should support new residential and industrial development in Haydock & Blackbrook which will make use of previously developed land. However, Haydock is located close to Junction 23 of the M6, and as such, any large trip-generating development proposals in this location will have to include measures to minimise and mitigate any potential impact upon the safe and efficient operation of the SRN.

**What changes required?**

**Council view**
No Change Recommended

**Justification**
The Council notes the concerns of the Highways Agency. However, part 5i of policy CAS4 states that development will be prevented from prejudicing the effectiveness of the Freight Route Network including J23 of the M6. Transport issues are dealt with in more detail by policy CP2, Creating An Accessible St.Helens, and the Ensuring Choice of Travel SPD. The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network.

**Change in Re-Publication Core Strategy**
No change

<table>
<thead>
<tr>
<th>10.9</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>315762</td>
</tr>
<tr>
<td><strong>Spatial Development Manager</strong></td>
<td>Government Office for the North west</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB387</td>
</tr>
</tbody>
</table>

**Legally Compliant?** Yes **Sound?** Yes **Issue raised before?** Yes

**If not, why not?**

**Any other comments?**
Minor textual comment

**Why considered unsound?**
GONW have mentioned previously that any change to the status of centres should really be addressed in the Core Strategy. Upon clarification it seemed that the role, boundary and function of the Clipsley Lane centre would be looked at in the Allocations DPD, but the background paper “Economy and Retail” at paragraph 11.4 mentions “with the potential to upgrade the status of the Local Centre to a District Centre”. This needs to be clarified/explained.

**What changes required?**
Provide clarification on Clipsley Lane

**Council view**
Partly Agree Recommend Change

**Justification**
The St Helens Local Study produced by WYG in 2006 highlights that there is a need to carry out further work to assess the potential upgrade of Clipsley Lane Local Centre to a District Centre. The function of the centre will be assessed through revision of the Core Strategy.
Change in Re-Publication Core Strategy
Amend point 3 in CAS4 to:

“The continued function of Clipsley Lane as a Local Centre will be supported and enhanced via appropriate development. Further analysis of this centre and its potential future status will be carried out with any required changes to the Borough’s retail hierarchy made as a future revision to the Core Strategy addressed through the Allocations DPD;

Amend last sentence 10.9. The local centres study considers that the area will be enhanced by the store and once trading patterns are established the boundary of the Local Centre Should be reviewed the function and boundary of the centre should be assessed. Any resulting changes to the Borough’s Retail Hierarchy will be made as a future revision to the Core Strategy.”
Chapter 11 – Rural St. Helens

Policy CAS 5  
Rural St. Helens

Respondent  
81844  
Helen Little  
Policy Adviser, Environment & Land Use National Farmers Union NE & NW Regions

Representation  
CSPUB190

Legally Compliant?  
Yes

Sound?  
Yes

Issue raised before?  
No

Legally Compliant?  
Yes

Sound?  
Yes

Issue raised before?  
No

If not, why not?  
We have not taken the opportunity at any earlier stage to make comments.

Any other comments?  
We do not consider the DPD non legally compliant or unsound. We simply wish to comment on the potential inclusion of a comment on farm diversification as an expansion of the wording in the document. Diversification into non agricultural activities is vital to the continuing viability of many farm enterprises; these are not normally located within existing settlement boundaries. We, the NFU, feel that local planning authorities should be supportive of well conceived farm diversification schemes for business purposes that contribute to sustainable development objectives, and are consistent in their scale within their rural location. This applies particularly to farm diversification schemes around the fringes of urban areas. We feel it is important that where relevant, favourable consideration is given to proposals in Green Belts where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. A supportive approach to farm diversification need not result in excessive expansion and encroachment of building development into the countryside.

What changes required?

Council view
No Change Recommended

Justification
Policy CAS 5 supports rural diversification 'where adequate access can be achieved and there is no significant impact upon the character of the area'. It is understood from this representation that the National Farmers Union would like the policy to support rural diversification outside of existing rural settlements and identified major developed sites within the Green Belt. However, all policies within the Core Strategy must be in conformity with PPG 2 on Green Belts and any applications that come forward for rural diversification within the Green Belt will have to be in accordance with PPG 2 and Green Belt policy, as stated within policy CAS 5. Further point 7 within policy CE1 supports the reuse of suitable buildings in rural areas for appropriate employment uses which is considered adequate to support the rural economy.

Change in Re-Publication Core Strategy
No change.

Policy CAS 5  
Rural St. Helens

Respondent  
315762  
Mrs Dianne  
Spatial Development Manager
Legally Compliant? Yes Sound? Yes Issue raised before? No
If not, why not? New wording
Any other comments? Minor textual comment

Why considered unsound?
paragraph 2- add “and Allocations DPD’ at end of paragraph.

What changes required?
paragraph 2- add “and Allocations DPD’ at end of paragraph.

Council view
Agree Recommend Change

Justification
Agree that need to include the Allocations DPD into this sentence rather than the Proposals Map DPD in isolation.

Change in Re-Publication Core Strategy
Policy CAS 5 sub section 2 add in ‘and Allocations DPD’ to following sentence ‘Detailed boundaries and development criteria will be included in the Proposals Map and Allocations DPD’.

Policy CAS 5 Rural St. Helens

Respondent 316124 Henderson Homes Ltd
Representation CSPUB712

Legally Compliant? Yes Sound? No Issue raised before? No
If not, why not?
At the Preferred Options stage minor adjustments to the Green Belt were proposed. This has not been carried forward in this draft.
Any other comments?

Why considered unsound?
Part 1 of the policy states that development will be restricted to being within existing rural settlement boundaries and existing identified major developed sites. It then states that outside of these areas development will comply with the Green Belt policy. We consider that this policy conflicts with the adopted RSS, which although it states that strategic Green Belt boundaries should not be reviewed before 2011, there is scope for local changes (RSS policy RDF4). In this case, we consider that the policy should revert back to paragraph 6.6 of the Core Strategy Preferred Options which states that the preferred approach is to maintain the existing Green Belt boundaries, apart from minor adjustments. We consider this is appropriate as it gives some flexibility to the Site Allocations DPD when allocating land for development. As the policy currently stands, it results in an inflexible policy which is contrary to Government guidance in particular PPS3. We consider it is important to have flexibility within the plan and therefore minor Green Belt changes would be appropriate. This would include the exclusion of the land shown on the plan from the Green Belt as submitted at the preferred options stage.
What changes required?
We consider that the policy should revert back to paragraph 6.6 of the Core Strategy Preferred Options which states that the preferred approach is to maintain the existing Green Belt boundaries, apart from non strategic adjustments.

Council view
No Change Recommended

Justification
The Council remains reluctant to pursue Green Belt release, including non strategic adjustments until after 2011 when there has been a Merseyside Green Belt study. The cumulative impact of non-strategic Green Belt release needs to be considered on a sub-regional basis. Further the recent update to the St. Helens SHLAA, assumptions made on windfall patterns within St. Helens and the recessionary delay provide further support in the need to wait until a comprehensive study can inform any future policy decisions about Green Belt. Additionally, our policy is not contrary to the RSS policy RDF4 because it states that any other local detailed boundary changes should be examined through the LDF process and our evidence suggests that this is not necessary until after 2011.

Change in Re-Publication Core Strategy
No change.

<table>
<thead>
<tr>
<th>Policy CAS 5</th>
<th>Rural St. Helens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB737</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td>Any other comments? We suggest amendment of Part 3 ii to: “Protect, enhance and manage biodiversity.”</td>
</tr>
<tr>
<td>Why considered unsound?</td>
<td>What changes required?</td>
</tr>
</tbody>
</table>

Council view
Partly Agree Recommend Change

Justification
Partly agree with comment in line with policy CQL 3 Biodiversity and Geological Conservation where the broad aim is to protect, manage, create and enhance. Alter part 3 point ii in line with policy CQL 3 to include both protect and create.

Change in Re-Publication Core Strategy
Amend Policy CQL3 part 3 (ii) to: ‘Protect, manage, and enhance and create biodiversity’.
Respondent 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation CSPUB741

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes

If not, why not?

Any other comments?
We suggest amendment of CAS5 or inclusion in the justification that consideration needs to be given to waste management operations such as composting & landfill being appropriate in the Green Belt. The same applies for minerals developments.

Why considered unsound?

What changes required?

Council view
No Change Recommended

Justification
Disagree. Waste and Minerals are not considered to be appropriate development according to PPG2. Whilst these types of development may be able to demonstrate special circumstances to justify a Green Belt location they are not considered appropriate development.

Change in Re-Publication Core Strategy
No change recommended

Policy CAS 5 Rural St. Helens

Respondent 83498 Jockey Club Racecourses Jockey Club Racecourses

Representation CSPUB1734

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? No

If not, why not?
We belived that the wording of preferred option (CAS 5.4) and its supporting text at paragraph 11.10 was sound.

Any other comments?
Our client is broadly supportive of this policy and is particularly pleased that haydock Park Racecourse remains identified as a major developed site in the green belt.

Why considered unsound?
Point 2 of CAS 5 notes that detailed boundaries and development criteria will be included in the proposals map DPD. Whilst detailed boundaries of such sites can and should be defined on the Proposals Map DPD detailed development criteria cannot. It is unclear whether policies and criteria for Major Developed Sites in the green belt will be included in the Development Management DPD or Site Allocations SPD. The policy therefore fails the test of effectiveness as the deliverability of the policy is questionable.

What changes required?
We suggest that point 2 of policy CAS 5 should be amended to read: "Detailed boundaries
will be shown on the proposals map DPD and development criteria for each site will be included in the Development Management DPD." Such an amendment would improve the deliverability and consequently the effectiveness of this policy, such that it would become "sound".

Council view
Agree Recommend Change

Justification
Agree that site specific polices cannot be recorded on the Proposals Map DPD. Any site specific policies are included in the Allocations DPD.

Change in Re-Publication Core Strategy
Policy CAS 5 sub section 2 add in ‘and Allocations DPD’ to following sentence “Detailed boundaries and development criteria will be included in the Proposals Map and Allocations DPD’.

Policy CAS 5  Rural St. Helens

Respondent 82085 Ms Lisa Henderson LDF Manager Highways Agency
Representation CSPUB1839

Legally Compliant? Sound? Issue raised before?
If not, why not?

Any other comments?

Why considered unsound?
The Agency should support Policy CAS 5, which proposes to only permit development in rural areas of the borough within existing rural settlements. In doing this, the Core Strategy will be in compliance with national Green Belt Policy. By locating small scale development in these locations, existing rural centres can be enhanced and can help to reduce the need to travel in areas where the private car can dominate. This particularly applies when additional core services are built into any development proposals or masterplans. The Agency would not support large trip-generating development proposals in rural areas, as they are likely to conflict with local, regional and national policy and will potentially impact upon the SRN.

What changes required?

Council view
No Change Recommended

Justification
The Council notes the concerns of the Highways Agency. Transport issues are dealt with in more detail by policy CP2, Creating An Accessible St.Helens, and the Ensuring A Choice of Travel SPD. The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network.

Change in Re-Publication Core Strategy
No change
Chapter 12 – Ensuring Quality Development in St. Helens

Policy CP 1  Ensuring Quality Development in St. Helens

Respondent 81648  Dawn Hewitt  Environment Agency (NW Regional Office)

Representation  CSPUB722

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  Yes

If not, why not?

Any other comments?

Why considered unsound...
iii. Environmental Quality The use of flood defences to protect new development from flooding is unsustainable and not supported by us.

What changes required?
The policy should make it clear that the use of flood defences is a last resort in considering residual risk once all other options have been exhausted.

Council view
Agree Recommend Change

Justification
PPS25 recommends a policy approach, which avoids flood risk to people and property where possible and manages it elsewhere, Policies should ensure that all new development in flood risk areas is appropriately flood resilient a strategic approach through policies in RSSs and LDDs which avoid adding to the causes or "sources" of flood risk

Change in Re-Publication Core Strategy
Amend Policy CP1 part 3 (iii):
“To be located in an area where its use is compatible with the identified flood zone in the SFRA, avoids adding to the causes and sources of flood risk and ensure no adverse impact on other sites. Where this cannot be achieved, but there is an overriding need for the development and a suitable alternative site cannot be identified, protection from the risk of flooding, through the use of flood defences, SUDS and other appropriate measures will be required;”

Policy CP 1  Ensuring Quality Development in St. Helens

Respondent 82491  Miss Lesley Bye  Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation  CSPUB745

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  Yes

If not, why not?

Any other comments?
Part 4.iv we suggest a sustainable construction standard for industrial/commercial
development also be set (we note achievement of Buildings for Life Rating of good or very good in part 1xi).

**Why considered unsound..**

**What changes required?**

**Council view**
No change recommended

**Justification**
The Council is not aware of any standard for the construction of industrial/commercial development in a sustainable way.

**Change in Re-Publication Core Strategy**
No change

<table>
<thead>
<tr>
<th>Policy CP 1</th>
<th>Ensuring Quality Development in St. Helens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB747</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes Sound?</td>
</tr>
</tbody>
</table>

**Any other comments?**
We suggest that the Key Delivery Items table should also refer to the Waste DPD

**Why considered unsound..**

**What changes required?**

**Council view**
Agree recommended change

**Justification**
The Waste DPD will aid the delivery of quality development in St. Helens

**Change in Re-Publication Core Strategy**
Waste DPD added to list of Key Delivery Items

<table>
<thead>
<tr>
<th>Policy CP 1</th>
<th>Ensuring Quality Development in St. Helens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561 Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB854</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes Sound?</td>
</tr>
</tbody>
</table>
If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment

Any other comments?

Why considered unsound..
The Coal Authority is concerned that the Core Strategy fails to take full account of unstable land, contrary to PPG14. This is of particular concern in St. Helens where our records show that coal resources are present across approximately 75% of the area and therefore land stability could be a significant issue due to past mining activity. In order to address this omission, the Coal Authority recommends inclusion of the following criteria following point 3.iv. of Policy CP1:

What changes required?
The Coal Authority recommends inclusion of the following criteria following point 3.iv. of Policy CP1: "v. Take full account of ground conditions to ensure that no instability issues exist as a result of past mining activity, and where land is found to be unstable undertake appropriate remediation measures to the satisfaction of the Local Planning Authority and the Coal Authority."

Council view
Partly agree recommended change

Justification
The Coal authority is correct that the issue of unstable land should be taken into account in the Core Strategy, especially given St.Helens history of coal mining. Policy CP1 part 3 (iv) deals with contamination and remediation, and so is a logical place to take account of unstable land.

Change in Re-Publication Core Strategy
Amend Policy CP1 part 3 (iv) as follows:
"Ensure the site of the proposed development is not contaminated and/or unstable or that provision can be made for its remediation to an appropriate standard taking into account its intended use and making use of sustainable remediation technologies;"

Policy CP 1 Ensuring Quality Development in St. Helens

| Respondent | 81646 | Judith Nelson | English Heritage (North West Region) |
| Representation | CSPUB1745 |

Legally Compliant? Yes, with minor changes
Sound? Issue raised before? No

If not, why not?
Detailed wording on this issue was not previously available

Any other comments?
The policy is supported, however, for clarity archaeological remains are not part of the natural environment.

Why considered unsound..
In summary - Changes are required for clarity as archaeological remains are part of the historic environment rather than the natural environment.

What changes required?
It is suggested that the title for section 2 be amended to read "Protection of the Natural and Historic Environment"
Council view
Agree Recommend Change

Justification
Agree change for clarity and accuracy - wording to be amended as requested.

Change in Re-Publication Core Strategy
Section 2 to be titled 'Protection of the Natural and Historic Environment'

<table>
<thead>
<tr>
<th>Policy CP 1</th>
<th>Ensuring Quality Development in St. Helens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81908 J M Carter Rainhill Civic Society</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1773</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes  Sound? Yes  Issue raised before? Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
</tbody>
</table>

Any other comments?
Summarised as: Support CP1 and would hope that a statement regarding demolition of traditional historic residences could be included.

Why considered unsound..

What changes required?

Council view
No Change Recommended

Justification
It is considered that Policy CP1 provides protection by requiring development proposals to safeguard and enhance the built and historic environment. Furthermore, policy CQL4 requires all new development to respect the quality of the built and historic environment. The Council is preparing a SPD on Residential Character Areas which seeks to ensure developments are sympathetic and appropriate to the character of the Borough’s residential character areas. This includes one area in Rainhill at present, though more may be designated over time. Such detail is not appropriate to the Core Strategy.

Change in Re-Publication Core Strategy
No change recommended.

12.4 Paragraph

| Respondent | 223810 Mr Jonathan Burns DPP Planning Consultancy |
| Representation | CSPUB1730                                  |
| Legally Compliant? | Yes  Sound? Yes, with minor changes  Issue raised before? No |
| If not, why not?                   |

Any other comments?
Because RSS adopted in September 2008 so confirmed wording of EM18 only available at this point.
Why considered unsound..
North West RSS policy EM18, which has been prepared in accordance with national policy, allows flexibility in delivery where it not feasible or viable to do so. This is not reflected in policy CP1.4.ii.

What changes required?
Policy CP4.1 should be amended to reflect the wording of policy EM18.

Council view
Agree Recommend Change

Justification
CP1 part 1.4.ii. should mirror the wording used in EM18 but further guidance will be provided in the climate change DPD.

Change in Re-Publication Core Strategy
Amend last sentence of CP1 part 4.(ii). to "An initial target of 10% renewable energy, subject to feasibility and viability, will be sought which will be superseded by a target in the Climate Change DPD".
Chapter 13 – Creating an Accessible St. Helens

Policy CP 2  Creating an Accessible St. Helens

<table>
<thead>
<tr>
<th>Respondent</th>
<th>303551</th>
<th>Mr Alex Naughton</th>
<th>Policy Officer Merseytravel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB9</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant?  Yes  Sound?  Yes  Issue raised before?  Yes

If not, why not?

Any other comments?
We also understand that St Helens has had its bid with Warrington and Halton for the Mid Mersey Growth Point approved by the Government. Clearly there will be significant transport implications arising from the developments connected with the Growth Point. Growth Point status however also presents an opportunity to strengthen options for strategically planned growth linking employment to housing growth to avoid areas of high environmental impact, and secure investment in infrastructure to improve accessibility. Merseytravel would be happy to participate and be represented on the "partnership group" for the Mid Mersey Growth Point to discuss transport issues. However with all the Growth Points around the Merseyside area (Wirral & Liverpool Mersey Heartlands Growth Point and the West Cheshire Growth Point) approved there is likely to be competition between them. Also with the economic crisis, credit crunch and the downturn in the housing market this may delay delivery timescales. We feel that the Core Strategy needs to be much more robust in relation to the Omega development in Warrington and how St Helens will work with Warrington so that St Helens and its people will actually benefit from this development, through improved transport links, provided at the developer's expense - and how they will ensure that Omega won't just pull labour out of the district and result in mass congestion on the highway networks. There is also the relationship between Parkside and Omega which needs balancing, what happens if it turns out that both proposals go ahead? How will they work together and be complementary rather than competitors?

Why considered unsound..

What changes required?

Council view
No change recommended

Justification
The impact of Omega and Parkside on the St. Helens employment and the employment land supply is considered in the Employment Land and Skills Review and the Economy & Retail Background Paper. Parkside and Omega are different developments with different target markets: Parkside is a railfreight based development, whereas Omega North is non-rail based B2 (general industrial) and B8 (storage and distribution), and Omega South is intended for B1 (office development). The traffic impacts of Parkside are difficult to determine before a detailed planning application is received and will be dealt with at that stage, although Core Strategy policy CAS3.2 includes safeguards regarding impact of traffic, and policy CP2 includes requirements for transport assessments and travel plans for significant generators of journeys such as Parkside.
Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>Policy CP 2</th>
<th>Creating an Accessible St. Helens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Ms Lisa Henderson LDF Manager Highways Agency</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1840</td>
</tr>
</tbody>
</table>

Legally Compliant? | Sound? | Issue raised before?
If not, why not?
Any other comments?

Why considered unsound..
In the St. Helens Preferred Options Report, it is stated that “direct access onto the Highways Agency’s motorways will not be permitted”. This statement is not repeated within the Core Strategy Publication Draft. The Agency should draw SHBC’s attention to the content of Circular 02/2007 (and the Agency’s response to the previous draft of this document) which states that “There is a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges. The Agency would request the inclusion of SHBC’s statement in the Core Strategy Publication Draft for the purposes of clarity and consistency. In addition, the previous response from the Agency requested that the review period for indirect accesses to the SRN be reduced from fifteen to ten years. “The Agency would again reiterate or request that this is included within the final Core Strategy”. In its response to SHBC, the Agency should highlight that Circular 02/2007 recognises that “it is government policy, wherever possible, to look at alternatives to building new roads through better network management and making smarter choices easier”. In line with Guidance on Transport Assessment, the Agency should require from SHBC that included within any spatial policy would be the introduction of methods to reduce the need to travel, particularly by private car. It is recommended that the Agency encourages and supports any land-use policies which aim to reduce private car travel within the St. Helens Borough, and in particular when such policies have the potential to impact upon the SRN.

What changes required?

Council view
No Change Recommended

Justification
The Council notes the concerns of the Highways Agency and notes that part 3 v) of policy CP2 states that measures to provide safe and adequate access to and from the public highway will be ensured by “restricting direct access to the strategic road network”. This shows a presumption against access whilst allowing for access in exceptional circumstances such as those mentioned by the agency. However the Council agree that this could be clearer and will amend the wording of the policy and supporting text. The time period has been changed from 15 to 10 years, and the issue of reducing private car travel is addressed by policy CP2, Creating An Accessible St.Helens, and the Ensuring A Choice of Travel SPD.

Change in Re-Publication Core Strategy
Amend Policy CP2 part 3 v:
“Restricting Preventing direct access to the Strategic Route Road Network other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges; and”
Insert new paragraph 13.6A after paragraph 13.6:

“13.6A The Strategic Route Network (SRN) consists of strategic roads managed by the government's Highways Agency. In St Helens the SRN comprises the M6 and M62 motorways. There is a general presumption that no new access onto the SRN will be made except to facilitate its operations (such as the provision of service areas, facilities for the travelling public and maintenance compounds) and, exceptionally, other major transport interchanges. Proposals for the Strategic Rail Freight Interchange at the former Parkside colliery, which would be a major transport interchange, will require direct access to the M6 for heavy goods vehicles however this will need to be agreed with the Highways Agency.”

Reason for correction: Misinterpretation of SRN, references should read Strategic Route Network.

**Policy CP 2**

**Creating an Accessible St. Helens**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82550</th>
<th>Mr Steven Broomhead</th>
<th>Chief Executive Northwest Regional Development Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1779</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? No

If not, why not?

Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?

We are pleased to note that this Policy CP 2 has been amended in response to our comments at the Preferred Options stage such that it no longer says that "Direct access onto the Highways Agency's motorways will not be permitted".

Why considered unsound..

What changes required?

Council view

Comments Noted

Justification

Change in Re-Publication Core Strategy

No change recommended.

<table>
<thead>
<tr>
<th>13.1</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>303551</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB5</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Yes Issue raised before? Yes

If not, why not?

Any other comments?

The zonal strategy for integrated ticketing across the CANGO area needs to ensure that it is integrated into and compatible with Merseytravel’s ticketing systems and any future ticketing arrangements that may be developed. Also links will be needed into the ticketing systems of Warrington and Greater Manchester as they are also in the CANGO area. As a result the
way forward regarding ticketing options will be dependent on discussions within the CANGO Cross Boundary Group and with Merseytravel, Warrington Borough Council and GMPTE as appropriate.

Why considered unsound..

What changes required?

Council view
Comments noted

Justification
Comments noted

Change in Re-Publication Core Strategy
No change
Chapter 14 – Providing Quality Housing in St. Helens

14 Providing Quality Housing in St. Helens

Respondent 82550 Mr Steven Broomhead Chief Executive Northwest Regional Development Agency

Representation CSPUB1780

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised No before?

If not, why not?
Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?
Summarised as: Support both CH1 and CH2 and welcome reference to provision of higher value market housing in CH2, which is consistent with RES.

Why considered unsound..

What changes required?

Council view
Comments Noted

Justification
Support Noted

Change in Re-Publication Core Strategy
No Change

Policy CH 1 Meeting St. Helens’ Housing Requirement

Respondent 315762 Mrs Dianne Wheatley Spatial Development Manager Government Office for the North west

Representation CSPUB261

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised No before?

If not, why not?
Different wording was used.

Any other comments?
This relates to the soundness test of whether the policy is justified.

Why considered unsound..
The reference to “gross” in the first line of the policy is potentially confusing- it could refer to gross completions rather than just including Growth Point figures in the total; it would be better to rephrase it as “...the net housing requirement for the period 2003-2025 comprises13,566 dwellings, including those proposed by the Mid Mersey Growth Point”. Also add “net” to the figures in the first line of the Key Delivery Items. Previous drafts had brief detail on how release of land would be managed as per PPS3 paragraph 61, and it would be helpful if brief detail could be included in the RJ or delivery strategy. Higher densities are referred to in paragraph 6 of the policy, but it does not say in relation to what? Is St Helens applying the national minimum of 30 dwellings per ha as per para 47 of PPS3, it
is not clear? Densities cannot be delegated to SPD.

**What changes required?**
Change first line of policy to “...the net housing requirement for the period 2003-2025 comprises 13,566 dwellings, including those proposed by the Mid Mersey Growth Point”. Also add “net” to the figures in the first line of the Key Delivery Items. Include brief detail on how release of land would be managed as per PPS3 paragraph 61. Clarify the Council's position on density - are the national standards being applied apart from when seeking higher densities?

**Council view**
Partly Agree Recommend Change

**Justification**
Agree that the first line of Policy CH 1 should be reworded for the avoidance of doubt, to include a reference to a "net", rather than "gross", housing requirement, and also to refer to those additional dwellings proposed by the Mid Mersey Growth Point. Similarly agree that "net" will be added to the first line of Policy CH 1 Key Delivery Items.

The Council agree to add further clarification to Policy CH 1 in terms of how the release of land will be managed, to satisfy PPS3 paragraph 61. The Council interprets the Regional housing provision as being a ‘floor’, rather than a ‘ceiling’, and therefore considers that this chiefly refers to managing situations of housing shortfall, rather than oversupply.

Paragraph 14.15 acknowledges that the current economic climate has had an impact upon the rate of housing completions. However, the housing trajectory (derived from the SHLAA) projects that the rate of housing completions will begin to recover in 2011 and will exceed annual requirements in the following years, which will reconcile for the current under-provision. The trajectory projects that the Council will be in a position of undersupply from 2021 and further wording will be added to paragraphs 14.15 and 14.16 to explain this.

Indeed, the bullet points within paragraph 14.16 set out three potential ways to address the shortfall at the end of the plan period: a windfall allowance, increased densities and Green Belt release. In addition, the response to CSPUB351 has also identified the possibility of addressing the shortfall through a fourth way of potentially suitable sites from the SHLAA.

For the avoidance of doubt, the Council will add a criterion to Policy CH 1 to consider how the identified shortfall at the end of the plan period might be addressed, which will strengthen the argued case in the supporting text at paragraph 14.16. This criterion will state that the Council will consider addressing the identified shortfall through a combination of: the possible release of Green Belt land in line with Regional guidance (and dependent upon work being carried out at the Merseyside Sub Regional level); sites being released from other uses (windfall allowance); increased densities; and more favourable views towards SHLAA potentially suitable sites. However, the Council is keen to stress this should be kept flexible bearing in mind Regional guidance and the results of a sub-regional Green Belt study. This criterion also reflects the approach from Policy CSS1 criterion vii.

It is argued that although residential performance is extensively managed through the Delivery and Monitoring Strategy (DMS) (Appendix 1) for Policy CH 1, it is agreed that this could be improved upon by also monitoring the distribution of development across the Borough in the DMS for Policy CSS 1. Notwithstanding this, relevant wording will be added to paragraph 14.15 to reference this information in the DMS.

However, it is felt that other arrangements for managing the release of land are adequately covered through other parts of the Core Strategy, specifically Policy CSS 1 (Overall Spatial Strategy) and the Area Strategy Policies: CAS 1 (St.Helens Core Area), 2 (Town Centre), 3.1 (Newton-le-Willows & Earlestown), 4 (Haydock & Blackbrook) and 5 (Rural St.Helens). Any release of land for residential development on specific sites will be allocated through the Allocations and Proposals Map DPDs and this is reflected in the Key Delivery Items box. In addition, the St.Helens Town Centre and Earlestown Town Centre Area Action Plans (AAPs) may also allocate land for residential development, and these will be added to the Key Delivery Items box.

It is agreed that Policy CH 1 should set explicit density requirements and the Council would like to highlight that densities were present in a previous draft of the document. The Preferred Options Core Strategy Policy CH 1 proposed to: refuse developments with densities less than 30 dwellings per hectare (dph), except in very special circumstances (criterion v); set a minimum density of between 30-40 dph and encourage higher densities in appropriate locations (criterion vi); and safeguard the character of established residential areas. The methodology of the 2008 and 2009
Strategic Housing Land Availability Assessments (SHLAAs) also followed the density approach of the Preferred Options Core Strategy when assessing the potential capacity of suitable sites.

It is therefore proposed that Preferred Options Core Strategy Policy CH 1 criterion v will be re-inserted to Policy CH 1, whilst existing criterion 6 will be re-worded to match similar wording from the previous criterion vi. This will help to clarify that the Council is applying the national indicative minimum density of 30 dph from PPS3 paragraph 47, whilst bearing in mind local circumstances having regard to PPS3 paragraph 46. The Residential Character Areas SPD, and as shown on the Proposals Map DPD, will also provide further guidance on applying suitable densities in areas that are safeguarded due to their particular residential character. The DMS explains how densities will be monitored throughout the plan period.

Change in Re-Publication Core Strategy

The first line of Policy CH 1 reworded to read:

“The gross net housing requirement...new dwellings, including those proposed by the Mid Mersey Growth Point. This will be achieved through: …”

Policy CH 1 amended to read:

1. Allocating land to meet the outstanding residual requirement for the period 2003-2006; and identifying land for the period 2020-2025;
2A. Identifying land for the period 2021-2026, through one or more of:
   i. Releasing sites from other uses, subject to meeting the requirements of other policies within the Core Strategy;
   ii. Increased densities, where appropriate;
   iii. Reconsideration of potentially suitable sites, as identified by the SHLAA;
   iv. Any release of land from the Green Belt in this period will be in line with Regional guidance and be dependent upon work being carried out at the Merseyside Sub-Regional level.”

Policy CH 1 amended to read:

“5A. Refusing developments achieving less than 30 dwellings per hectare, unless there are very special circumstances;
6. Requiring developments to achieve a minimum density of 30 dwellings per hectare and encouraging higher density developments in sustainable locations, such as within and adjacent to St.Helens and Earlestown Town Centres and where well served by public transport;”

The first line of Policy CH 1 Key Delivery Items box amended to read: “…net new dwellings completed by…”

The following wording added to the final line of Policy CH 1 Key Delivery Items box:

“...Adoption of St.Helens Central Spatial Area and Earlestown Town Centre AAPs.”

Paragraph 14.15 reworded to read: “However, the recession, which commenced in 2008, will have a significant impact on the rate of housing completions. For example, the Annual Completions Survey, undertaken in April 2009 indicated total net completions in 2008/09 to be 240, against a Growth Point target of 684. The housing trajectory projects that the rate of housing completions will begin to recover in 2011 and will exceed annual requirements in the following years, which will reconcile for the current under-provision. Housing completions and the release of land will continue to be monitored through the Annual Monitoring Statement Report, the annual Housing Land Position Statement and Strategic Housing Land Availability Assessment SHLAA, as explained in the Delivery and Monitoring Strategy.”

Paragraph 14.16 reworded to read: “The trajectory projects that the Council will be in a position of undersupply from 2021. The shortfall could be addressed…”

The following table inserted below the Key Delivery Items table in the Delivery and Monitoring Strategy for Policy CSS 1 (Overall Spatial Strategy):
### Targets and Indicators

<table>
<thead>
<tr>
<th>Item</th>
<th>Baseline</th>
<th>Target</th>
<th>How</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distribution of residential development</td>
<td>2009 Annual Monitoring Report (AMR)</td>
<td>• 72% St.Helens</td>
<td>AMR: annual Housing Land Position Statement (HLPS): and Strategic Housing Land Availability Assessment (SHLAA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 20% Newton-le-Willows and Earlestown</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 5% Haydock and Blackbrook</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 3% Rural St.Helens</td>
<td></td>
</tr>
</tbody>
</table>

The following row inserted into the Key Delivery Items table in the Delivery and Monitoring Strategy for Policy CH 1:

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost and funding</th>
<th>Who</th>
<th>Delivery</th>
<th>Time Frame</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adoption of St.Helens Town Centre and Earlestown Town Centre AAPs</td>
<td>STHMBC Staff Time and LDF Budget</td>
<td>STHMBC</td>
<td>Preparation begun 2009.</td>
<td>2012</td>
</tr>
</tbody>
</table>

### Policy CH 1  Meeting St. Helens’ Housing Requirement

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>Henderson Homes Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>316124</td>
<td>CSPUB719</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

*Why considered unsound..*

We support the use of 570 dwellings per annum as set out in the RSS as well as the 20% uplift as a result of the Mid-Mersey growth point status. We also support the extension of the plan period beyond 2021, however, we consider that 2025 is not an appropriate end date to accord with PPS3. Although paragraph 53 of PPS3 states that a DPD should have a period of at least 15 years from adoption. Therefore an end date of 2025 is the minimum should the Core Strategy be adopted by 2010 as programmed. We consider the end date should be extended to 2031. Our reasoning for an end date of 2031 is that the subsequent DPDs, such as the Site Allocations DPD, which will come after the Core Strategy, will also need to plan for a 15 year period, which takes it beyond the proposed end date of the Core Strategy. The current adoption date for the Site Allocations DPD is 2012, which would therefore need to also plan for at least 15 years to accord with paragraphs 53 to 55 of PPS3. This would mean an end date of at least 2027. Therefore an extension of the Core Strategy to at least 2031 would provide the council with a longer time horizon, which will then enable the Site Allocations DPD to plan for at least 15 years from its own adoption. Paragraph 14.11 of the CSSD, states that following the Strategic Housing Land Availability Assessment (SHLAA), for the 5 and 10 years periods there is a surplus of 472 and 1069 dwellings respectively. However, there is a shortfall of land of 1,055 dwellings for the 11-15 year period post 2020. This surplus provides an element of flexibility that assumes that a significant portion of all existing dwellings with planning permission or those in the SHLAA will come forward.
However, because of the council’s strategy for no changes to the Green Belt, should the housing provision not come forward as expected, there is no potential for minor changes to the Green Belt within the Core Strategy to meet any shortfall. This in our view is an important omission. Paragraph 14.16 states that the shortfall can be addressed in three main ways. The first is a windfall allowance, the second is increased densities and the third is Green Belt release. The council assume that there is potential for capacity of a 775 dwelling windfall allowance between years 11 to 15. The second option is increased densities and we support the council in their view that the current and changing market conditions, the potential is for sites to have their densities reduced rather than increased. This may have an impact on the sites with planning permission or allocations which may exacerbate the shortfall identified in paragraph 14.11. The third option is Green Belt releases. The council state that they are reluctant to pursue Green Belt release including small scale non strategic release for two reasons. Firstly the assumptions on windfalls and the recessionary delay creates sufficient doubt as to the justification of such a radical change to establish a Merseyside Green Belt policy. The second is the impact on the regeneration within the wider Merseyside sub region. As noted in our objections in section 3, we are not proposing strategic Green Belt releases but that the plan at least provides for that flexibility should the Allocations DPD require such sites to come forward. It would not open a wholesale release of Green Belt land but could enable the council to deliver the housing requirement should it be required.

**What changes required?**
An extension of the Core Strategy to at least 2031 would provide the council with a longer time horizon, which will then enable the Site Allocations DPD to plan for at least 15 years from its own adoption. In additon non strategic alterations to the Green Belt should be included in the Core Strategy to provide the Site Allocations DPD with the flexibility should additional sites be required to meet the shortfall in years 11 to 15.

**Council view**
No Change Recommended

**Justification**
According to PPS12 paragraph 3.1, the Core Strategy is the principal DPD, and paragraph 4.13 states that the lifespan of the Core Strategy should be at least 15 years from the date of adoption. Whilst PPS3 paragraph 53 states that authorities should plan for housing delivery for at least 15 years from the date of adoption in Local Development Documents, it is argued that PPS12 should take precedence over PPS3, and that this 15 year period is set by the higher-order Core Strategy. The Allocations DPD, and other DPDs, are subservient to the Core Strategy as they are intended to deliver its strategy. Therefore the Council maintains that other lower-order DPDs should not exceed the timespan of the Core Strategy.

The Council proposes to maintain its position towards any release of Green Belt for new housing development as justified in paragraph 14.16, in that it is reluctant to pursue Green Belt release, including small scale non-strategic release. The Council wishes to reiterate that a more structured approach to Green Belt release will be considered at the sub-regional level with Merseyside authorities (including Halton and West Lancashire). In addition, paragraph 4.11 of the Housing Background Paper also highlights that there are a number of sites in the SHLAA which were originally discounted, but could be potentially suitable with further investigation. In combination with a windfall allowance and increased densities, this could meet the identified shortfall in years 11-15 of the plan without the need for Green Belt release.

**Change in Re-Publication Core Strategy**
No Change

<table>
<thead>
<tr>
<th>Policy CH 1</th>
<th>Meeting St. Helens’ Housing Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>81908 J M Carter Rainhill Civic Society</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1772</td>
</tr>
</tbody>
</table>
Legally Compliant?  Yes  Sound?  Yes  Issue raised before?  Yes

If not, why not?

Any other comments?
Support 80% of development being on previously developed land.

Why considered unsound..

What changes required?

Council view
Comments Noted

Justification
Support Noted

Change in Re-Publication Core Strategy
No Change

<table>
<thead>
<tr>
<th>Policy CH 1</th>
<th>Meeting St. Helens’ Housing Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>167432 Mr Simon Artiss Planning Manager Bellway Homes Ltd</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1746</td>
</tr>
</tbody>
</table>

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  No

If not, why not?
Resource constraints.

Any other comments?

Why considered unsound..
1. We remain concerned over the emphasis upon previously developed land (PDL) and urban regeneration. Our recent experience is that PDL landowners still hold out a higher ‘hope’ value and this will delay the delivery of new homes, as landowners are prepared to play a waiting game until the market returns. The Core Strategy must not preclude Greenfield land release as part of the delivery agenda;

2. The rate of development (housing land supply and commitments) should be realistic. Higher density schemes are being delayed or withdrawn. Lower density schemes will therefore reduce total numbers (supply) and mean that more land is required to deliver (minimum) RSS/Growth Point numbers. Therefore Greenfield options should not be ruled out;

3. Criteria based policies for Greenfield land release should not be overly-prohibitive. Greenfield land in sustainable locations should be viewed as part of the delivery agenda rather than a last resort;

4. The cost of developing land (especially PDL) for new homes is a material policy consideration. A strategy towards PDL and regeneration increases development costs and therefore planning gain needs to be realistic, especially given the growing cost of delivering Code for Sustainable Homes;

5. Avoid duplication of other powers/ statute;

6. The Preferred Options should be amended to accommodate the extra housing numbers above (minimum) RSS targets, as Growth Point is a significant material change since the last draft Core Strategy;

7. The Cost of Development - with property prices dropping and no firm sign of a return, your
policies need to reflect the fact that margins are much tighter. Increasingly viability is an issue and you will need policies (DPD/SPD) that allow for negotiation.

What changes required?

Council view
No Change Recommended

Justification

With reference to point 1, the Council is committed to regeneration and this is reflected by the local previously developed land target (PDL) of 80% for new residential development, which goes beyond the 65% RSS target (RSS Policy L4) for St.Helens and Halton. This is justified by 90% of completions being delivered on PDL between 2003/04 and 2007/08, and also that 87% of the supply identified in the SHLAA is on PDL. However, with reference to point 3, the Council recognises that there will be a need for a small proportion of greenfield land to come forward under Policy CH 1. Therefore the policy potentially allows up to 20% of new residential development to be delivered on greenfield land, but only where: it forms a minor part of a larger development site; or it delivers an overriding significant social, economic and environmental benefit; or it is an application for a barn conversion.

With reference to points 1, 2, 4 and 7, the Council understands that the current depressed market conditions have affected the rate, density and cost of development, and also recognises the anecdotal evidence regarding higher 'hope' values being held by landowners. However, the Core Strategy is a long-term plan over 15 years and it would be inappropriate to base long-term future policy on current depressed market conditions. It is proposed that the Core Strategy will now plan for the period up to 2026 in light of the delay to the anticipated date of adoption and in line with PPS12 and PPS3 (i.e. 15 years from anticipated adoption date of 2011/12 to 2025/26). As the market will change significantly within this time, the Council still maintains the PDL target of 80% in Policy CH 1. Notwithstanding this, Policy CH 2 (Meeting St.Helens’ Housing Needs) allows economic viability to be taken into account when requiring Affordable Housing provision. The future Development Management DPD may also allow economic viability to be taken into consideration when it sets out other planning obligations required to be provided by developers.

With reference to point 5, the Council notes this comment and agrees to ensure that the duplication of other powers/ statute is avoided wherever possible.

With reference to point 6, whilst it is acknowledged that the Mid Mersey Growth Point status was awarded after the Preferred Options consultation stage, it is not felt that this constitutes a material change to the overall Core Strategy. In St.Helens, Growth Point status between 2008/09 and 2016/17 has uplifted the RSS annual housing target by 20% from 570 to 684 new dwellings, which equates to an additional 1,026 new dwellings above RSS figures. However, the Core Strategy still proposes to accommodate new housing development in its existing settlement areas, with the majority being located on PDL and it is argued that this does not constitute a material change.

Change in Re-Publication Core Strategy
No Change

Reason for correction: Council justification altered for clarity and also to cover all points raised by the representation, including additional information regarding economic viability and the duplication of other powers/statute.

Policy CH 1       Meeting St. Helens’ Housing Requirement

Respondent Representation
82085 Ms Lisa Henderson LDF Manager Highways Agency
CSPUB1841

Legally Compliant? Sound? Issue raised before?
If not, why not?
Any other comments?

**Why considered unsound..**

The Agency should support the objective of delivering a minimum 80% of new dwellings within St. Helens on previously occupied land. The Agency should especially be supportive of sites within Town Centres and close to public transport. The Agency would require consultation at the earliest stages of masterplanning / pre-application, of any previously developed land with limited sustainable access, should such sites come forward, so it can have an input into any development proposals. The Agency would give its support to SHBC in proposing to locate development on windfall sites, provided they are in line with current regional and national policy and will not have a detrimental effect on the operation of the SRN. In addition, the aspiration to remove dereliction on major routes into and through the Borough should be welcomed by the Agency. Whilst it may appear that removing dereliction on major routes may lead to an increase in the number of trips reaching the SRN, said major routes should provide the opportunity for sustainable modes if they are key public transport routes. As such, the Agency would encourage the development of sites on key public transport routes, whereas, the Agency would not encourage developments on key routes that are not well served by public transport as these sites are more likely to impact upon the SRN. Where public transport infrastructure on major routes is not sufficient, the Agency should encourage infrastructure enhancements and improvements to ensure housing sites can come forward on a sustainable basis. The Agency should express an understanding of the housing needs of the Borough, as set out by the North West Regional Spatial Strategy. Notwithstanding this, the Agency should seek to ensure that sustainability is the core basis upon which St. Helens’ planning policies are developed. The Agency should make SHBC aware there is a balance to be struck between delivering regional policy and its transport implications; particularly the management of the number of car trips. As such, the Agency should remind SHBC that the sustainable characteristics of a site should be of primary concern when selecting proposals to take forward. In order to comment specifically on the potential impact of a proposed development on the SRN, the Agency should request more detailed information regarding the proposed development sites and land allocations being promoted within the Borough, and use the spatial planning tools available to allow more detailed comments to be made.

**What changes required?**

**Council view**

No Change Recommended

**Justification**

The Council welcomes the support of the Highways Agency regarding the re-use of brownfield land and removing dereliction on major routes. The Council also notes the concerns of the Highways Agency regarding sustainability and managing car trip generation. The Strategic Housing Land Availability Assessment took account of accessibility issues. Transport issues are dealt with in more detail by policy CP2, Creating An Accessible St.Helens, and the Ensuring A Choice of TravelSPD. The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network. In the preparation of the Allocations DPD the individual and cumulative impact of the sites on the transport network will be assessed.

**Change in Re-Publication Core Strategy**

No change

<table>
<thead>
<tr>
<th>14.5</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>315762</td>
</tr>
</tbody>
</table>
### Paragraph 14.11

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
<th>Spatial Development Manager, Government Office for the North west</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB401</td>
<td>Wheatley</td>
<td>Government Office for the North west</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
<td>Sound?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**If not, why not?**
New information

**Any other comments?**
Minor textual comment

**Why considered unsound?**
Figures could be included in the background paper for the housing trajectory, as well as the graphs, as numbers are not always clear from the charts/graphs— for example, it appears that some housing has planning permission from paragraph 14.13?

**What changes required?**
Include background housing figures in the background paper

**Council view**
Agree Recommend Change

**Justification**
It is agreed that detailed figures should be included in the Housing Background Paper for the housing trajectory.

**Change in Re-Publication Core Strategy**
No change to paragraph 14.11 of the Core Strategy. However, the Housing Background Paper will be updated to include detailed figures for the housing trajectory.

---

### Paragraph 14.16

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
<th>Spatial Development Manager, Government Office for the North west</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB351</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td></td>
<td>Sound?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? No

If not, why not?
New information at this stage- background paper etc

Any other comments?
This relates to the test of the policy being justified

Why considered unsound..
From paragraph 4.11 of the Housing Background paper, it would appear that any shortfall in housing supply at the end of the plan period could also be made up by SHLAA discounted sites that could be potentially suitable with further investigation, and other sites with access issues etc. If this is the case, it would be helpful to mention this as part of the RJ, in order to strengthen your case on the shortfall envisaged.

What changes required?
Add information from the background paper on other sources of meeting shortfall if this is the case.

Council view
Agree Recommend Change

Justification
It is agreed that the argument of meeting the shortfall of housing supply at the end of the plan period with SHLAA discounted sites that could be potentially suitable with further investigation may be appropriate. Therefore it is agreed that this could be added into the justification for Policy CH 1 at paragraph 14.16, with influence from paragraph 4.11 of the Housing Background Paper.

Change in Re-Publication Core Strategy
The bullet points within paragraph 14.16 amended to read:
- The shortfall could be addressed in three four main ways:
  - Windfall Allowance …
  - Increased densities …
  - Potentially suitable sites – The SHLAA identifies a number of sites that were discounted as being potentially suitable with further investigation. Several open space sites and a number of Helena Partnerships sites with potential access issues may be suitable with further investigation. These sites could deliver approximately 374 units.
  - Green Belt release …”

Policy CH 2  Meeting St. Helens’ Housing Needs

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>John Frodsham</th>
<th>St Helens College</th>
</tr>
</thead>
<tbody>
<tr>
<td>81951</td>
<td>CSPUB1848</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legally Compliant? Yes Sound? Issue raised before?

If not, why not?

Any other comments?

Why considered unsound?
Concerned that this policy applies retrospectively to planning applications already agreed. Developments are required to provide at least 30% affordable housing. This will make it harder to retain the affordable housing provision currently envisaged and will inevitably impact upon the associated business plan outcomes and possibly may lead to the development not proceeding.

What changes required?

Council view
No Change Recommended
Justification
The Council will not be applying Policy CH2 retrospectively against existing applications with planning permission. However, if Affordable Housing still needs to be resolved on an application, then it will be judged against the current policy in force at the time. Notwithstanding this, the Council’s requirement for 30% Affordable Housing is balanced by undertaking an independent site-specific economic viability study, to see what is achievable on a site where the developer does not think it is possible, and in such cases the Council’s requirement may be relaxed accordingly.

Change in Re-Publication Core Strategy
No Change.

Reason for correction: Representation accidentally omitted.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Meeting St. Helens’ Housing Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>81951 John Frodsham St Helens College</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
</tr>
</tbody>
</table>

Concerned that this policy applies retrospectively to planning applications already agreed. If it is thought that the affordable housing target cannot be met it will need to be justified through an independent financial appraisal. Developers have to finance the appraisal that would be undertaken by a consultant appointed by the Council on a retainer contract. It seems unreasonable that developers pay for a report with which they have no say over who writes it. Rather than a consultant being forced upon a developer would it not be more reasonable, and perhaps result in a more independent review, if the consultant appointed is mutually agreed. If this is not the case then it is hard for a developer to be sure that they are getting best value and best service.

What changes required?

Council view
No Change Recommended

Justification
The Council will not be applying Policy CH2 retrospectively against existing applications with planning permission. However, if Affordable Housing still needs to be resolved on an application, then it will be judged against the current policy in force at the time. Notwithstanding this, the Council having a retained consultant on-board to assess site-specific viability studies will bring practical benefits. Firstly, it enables such work to be carried out within a quicker timescale. Secondly, it ensures that the chosen consultant does not have any conflicting interests in the Borough and can operate impartially. Despite this, the result of any financial appraisal should only depend upon the information that the developer provides (as verified by the consultant).

Change in Re-Publication Core Strategy
No Change.

Reason for correction: Representation accidentally omitted.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Meeting St. Helens’ Housing Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>315762 Mrs Dianne Wheatley Government Office for the North west</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
</tr>
</tbody>
</table>
If not, why not?
Information gained from SPD

Any other comments?
This relates to the test of the policy being effective

Why considered unsound..
We note that the draft Affordable Housing SPD includes a breakdown of the 30% affordable housing target to include housing for social rent (15%) and shared ownership (15%) to meet affordable housing needs. This would usefully be included within the Core Strategy to support the policy.

What changes required?
Include information within the plan on split of type of affordable affordable housing sought as per paragraph 29 of PPS3

Council view
Agree Recommend Change

Justification
The Council maintains that the breakdown of the 30% Affordable Housing target between social-rented and intermediate housing should be identified in the Affordable Housing SPD, rather than the Core Strategy in Policy CH 2. PPS3 paragraph 29 states that local authorities should identify the split between social-rented and intermediate affordable housing, where appropriate, in Local Development Documents (LDDs), which include both DPDs and SPDs. The Council wishes to keep the Core Strategy flexible so that the split can be varied through a future revision to the Affordable Housing SPD if new evidence becomes available through the SHMA of the relative need for Social Rented/Intermediate Affordable Housing. However, it is agreed that this should be clarified in the supporting text to Policy CH2 at paragraph 14.24A.

Change in Re-Publication Core Strategy
Paragraph 14.24A inserted to read:
“14.24A The breakdown of the 30% Affordable Housing target between social-rented and intermediate housing will be determined by the Affordable Housing SPD.”

<table>
<thead>
<tr>
<th>Policy CH3</th>
<th>Meeting the Needs of Gypsies, Travellers and Travelling Showpeople</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315762 Mrs Dianne Wheatley, Spatial Development Manager, Government Office for the North west</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB408</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?
New information

Any other comments?
Minor textual comment

Why considered unsound..
Background Paper Housing: paragraph 4.89 still refers to the previous draft version of the Gypsies and Travellers policy being included at Publication stage and needs to be updated.

What changes required?
Update background paper on gypsies and travellers approach

Council view
Agree Recommend Change
Justification
Agree that the Background Paper for Housing needs to be updated to reflect the most up-to-date version of Policy CH3.

Change in Re-Publication Core Strategy
Paragraph 4.89 of the Housing Background Paper will be amended to reflect the most up-to-date version of Policy CH3.
Chapter 15 – Ensuring a Strong and Sustainable St. Helens Economy

Policy CE1 | A Strong and Sustainable Economy
---|---
Respondent | 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service
Representation | CSPUB759

Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? | Yes
If not, why not?

Any other comments?
The Key Delivery Items Table should refer to the Waste DPD.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
It is not appropriate to refer to the Waste DPD as its primary purpose is not to provide employment land and premises or economic regeneration.

Change in Re-Publication Core Strategy
No change

Policy CE1 | A Strong and Sustainable Economy
---|---
Respondent | 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service
Representation | CSPUB752

Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? | Yes
If not, why not?

Any other comments?
We suggest that there should be reference to the provision of waste sites through proposed allocations in the emerging Waste DPD.

Why considered unsound.

What changes required?
Council view
No Change Recommended

Justification
It is not appropriate to refer to the Waste DPD as its primary purpose is not to provide employment land and premises or economic regeneration.

Change in Re-Publication Core Strategy
No change

Policy CE1
A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Gresham House Plc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB760</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes, with minor changes  Issue raised before? No

If not, why not?
GVA Grimley were not retained by the landowners. Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

Any other comments?

Why considered unsound..
The policy at (1) sets out general approach to employment land noting that the focus of provision will be on B8 uses. With regard to the loss of existing employment land to “non-employment” generating uses the policy at (3) sets out the test that needs to be met before such development can be considered acceptable. Whilst Gresham House plc, as owners of Deacon Trading Estate, understand and support the principle of the approach as set out within Policy CE1, there are points of detail which do raise some concern, namely: a) The requirement for a 5 year marketing period using a methodology agreed by the Council as set out at 3(v). If taken literally this would introduce a significant constraint on development and represent an unreasonable burden on landowners, developers etc. It would essentially maintain a “status quo” position for the short to medium term whilst a “paper” marketing exercise was undertaken. We accept that evidence of marketing has a role to play in explaining viability however the requirement appears overly restrictive; the policy should be amended so as to incorporate flexibility (for instance enabling regard to be had to historical marketing, varying the period required etc). b) The requirement for a site to be the subject of an adopted Development Brief is again considered to be overly restrictive. To make this a specific policy requirement introduces an unnecessary level of consideration. There is no reason why such ‘windfall’ cannot be potentially be brought forward as a planning application. Such proposals would be wholly capable of being considered under the provision of the development control system and in accordance with the policy framework provided by the UDP and emerging LDF. The policy should therefore be less prescription and include flexibility as appropriate. Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

What changes required?
Please refer to text above. Submitted on behalf of Gresham House plc, 5 Princes Gate, London, SW7 1QJ by GVA Grimley ltd

Council view
Agree Recommend Change

Justification
Agree that the marketing period should not be set at 5 years but should instead be agreed with the council to take account of different circumstances

Also, agree that the criteria relating to Adopted Development Briefs should be removed as this may prove to be impractical in some instances.

Change in Re-Publication Core Strategy
Amend CE1, Point 3 “The loss of other sites and premises to non-employment generating
uses will only be acceptable where the site:

IV  Can be proven to be economically unviable, with no realistic prospect for reuse for economic purposes; and

V  Has been marketed for economic purposes using a methodology agreed by the Council for a period of 5 years and period of time agreed with the Council;

VI  is the subject of a Development Brief agreed with, and adopted by the Council;

VII  The redevelopment has no negative impact on surrounding land uses.

Reason for correction: The word ‘other’ appeared in the Publication Version of the Core Strategy but was accidentally deleted from the policy whilst making other amendments and needs to be reinserted.

Policy CE1  A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Jockey Club Racecourses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1735</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?

Our client is very supportive of the Preferred Options paragraphs 13.16 and 13.17, which included Haydock Park Racecourse as a key tourism opportunity.

Any other comments?

Why considered unsound...

Whereas the Preferred Options document identified tourism as an important growth area for St Helens and included Haydock Park Racecourse as a key tourism opportunity at paragraphs 13.16 and 13.17, the Publication Core Strategy seems to play down the importance of tourism to the economy and has removed many references to this. This omission does not appear to be supported in any of the background papers. CE 1 is consequently unsound.

What changes required?

Our client would like to see greater reference to the importance of tourism within policy CE1 and in particular reference to supporting Haydock Park Racecourse as a key tourism opportunity and economic driver. Such a change would assist in making policy sound by reinstating the recognition of an important economic sector whose absence is currently unjustified.

Council view

No Change Recommended

Justification

CE1 seeks to support the delivery of The St Helens City Growth Strategy. Action Area C1: Leisure Destination Of Choice includes the enhancement of Haydock Park Racecourse which looks to further develop the grounds infrastructure to accommodate more fixtures which will be fully supported by this policy. The policy also provides support for the creation and expansion of tourist resources and facilities which support the Tourism Strategy, Destination St Helens, by favourably considering appropriate planning applications. Policy CAS 5 Identifies Haydock Racecourse as a Major Developed Site In The Greenbelt and highlights that development criteria and the definition of the sites boundary will be provided through the Proposals Map and Allocations DPDs.

Change in Re-Publication Core Strategy
Why considered unsound..  
Draft PPS 4 makes reference to retail as a major employment generating use. Retail and Leisure provide employment as well as traditional manufacturing and other B8 uses. However, this has not been fully recognised. PPS 4 recognises the importance of such uses to the wider economy and overall economic development. Policy CE1 includes the need to provide at least 60 HA of land for economic purposes to 2025. This will primarily be for B8 purposes. In light of the wording "Primarily" we consider that policy CE1 should also recognise that other uses such as retail and leisure development could be acceptable on existing sites used for employment purposes or allocated employment sites providing developments that address all national and regional policies and do not hinder the Councils ability to meet the requirements of RSS Policy W3. In light of this the Council should consider alternative employment generating developments favourably on existing allocated employment sites.

What changes required?  
We consider that inserted between CE1 3 and 4 should be "The loss of existing employment land and premises to other employment generating uses will be favourably considered subject to other relevant policies in the plan dealing with those forms of development."

Council view  
Partly Agree Recommend Change

Justification  
Acknowledge that PPS4 classes retail and leisure uses as employment generating uses. However, PPS 4 is currently in draft so little weight can be applied to it currently.

The quantum of land discussed in the policy stems from the findings of the St Helens Employment Land and Skills Review 2009, which has been carried out in line with the Employment Land Review Guidance Note published by the ODPM in 2004. It considers land suitability in terms of B1, B2 & B8, along the same basis as W3 in the RSS. No assessment has been made of these sites in terms of their suitability for retail or leisure uses which are still classed as town centre uses and would still be subject to the impact tests set out in both PPS6 and Draft PPS4.

Change in Re-Publication Core Strategy  
Add after CE1 point 3 VII, new Para 3A. "Other employment generating uses may be appropriate on employment land and premises where the provision of employment land and premises is not prejudiced and where the proposed use is fully compliant with all policies associated with that use."

Reason for correction: The word ‘and’ was missed out of the addition to the policy.
Policy CE1  A Strong and Sustainable Economy

Respondent  82085  Ms Lisa Henderson  LDF Manager Highways Agency
Representation  CSPUB1842

Legally Compliant?  Sound?  Issue raised before?

If not, why not?

Any other comments?

Why considered unsound...
Policy CE 1 identifies Haydock Industrial Estate as a site with the potential to meet the economic growth needs of the borough up to 2025. The Agency would be supportive of the development of such sites when they are located within established industrial areas. However, this location is close to Junction 23 of the M6 and as such, the Agency would not support this policy unless proposals can be developed incorporating sustainable travel principles to ensure that the any development at this location will have a minimal effect upon the SRN. The Highways Agency would advise St. Helens that economic development sites should be promoted in order of sustainability, using appropriate areas of previously developed land where possible. This will ensure there are non-car linkages to residential areas and core services, which can potentially reduce the need to access the development by private car. B1 Office is generally a large trip generator compared to other employment land use types. For this reason, the Agency should support the policy of developing B1 Office uses within and adjacent to St. Helens Town Centre to maximise the sustainable potential of such developments.

What changes required?

Council view
No Change Recommended

Justification
The Council notes the concerns of the Highways Agency. However, part 5i of policy CAS4, Haydock and Blackbrook Strategy, states that development will be prevented from prejudicing the effectiveness of the Freight Route Network including J23 of the M6. Transport issues are dealt with in more detail by policy CP2, Creating An Accessible St.Helens, and the Ensuring A Choice of Travel SPD. Planning Applications for significant generators of journeys will be required to submit Transport Assessments and prepare a Travel Plan to promote smarter choices in reducing private vehicle trips and encourage shift to more sustainable modes of transport. The Highways Agency will be consulted on any LDF documents, including the Allocations DPD, and any planning applications where there may be an impact on the Strategic Road Network. B1 office development will have to accord with the principles set out in PPS6, Planning For Town Centres, categorises B1 Office development as a town centre use and as such should follow the sequential approach of searching for sites in the town centre, then on the edge before out of centre locations are considered. It is not necessary to repeat this national policy.

Change in Re-Publication Core Strategy
No change

Policy CE1  A Strong and Sustainable Economy

Respondent  82550  Mr Steven Broomhead  Chief Executive Northwest Regional Development Agency
Representation  CSPUB1781

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  No

If not, why not?
Our comments relate to detailed policy wording which was not available at earlier stages.

Any other comments?
Summarised as:

i. The proposed allocation of economic land is indicated as 'at least 60 hectares of additional land to 2025'. Clarification is need as to whether this is this will be on top of existing provision. It is difficult to assess the adequacy of this provision until further work is undertaken to agree distribution of the RSS requirement. Work on regional apportionment is ongoing but has not yet been agreed.

ii. The policy refers to development at Parkside and Omega North contributing toward B8 land supply. The appropriateness of their inclusion should be clarified with the Regional Planning Body as: RSS policy W3 is not intended to include inter-modal freight terminals; and Omega is part of an adjoining sub-region and could result in double counting.

iii. Support CE 1.3, which satisfactorily addresses the safeguarding of existing employment land.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification

i. Remove the word "additional" from the policy. Following the Employment Land and Skills Review (ELS), the allocation of economic land was revised downwards from 95.5ha, (the economic land supply based on UDP allocations and other suitable sites identified at preferred options), to 60ha (the estimated demand for land in the Labour Supply Scenario in the ELS in the Publication Draft. This is revised to 30ha by deducting jobs created by Parkside from the Labour Supply Local Housing Demand Variant Scenario for the Re-Publication Draft. The ELS identified that some of this provision could be met by the reallocation of land, currently in use for B2 purposes, which was expected to become vacant during the plan period and could be reallocated for B8 use. Therefore, the 30ha needed would be met by a combination of land currently identified in the economic land supply, and the reallocation of land no longer needed for B2 purposes. It would not therefore be fully additional to the current supply. It is recognised that CE1 may not explain this fully and amendments will be made to clarify. Work on regional apportionment is ongoing, but has not yet been agreed.

ii. References to Parkside and Omega relate to their effect on demand within St.Helens rather than provision of land. Neither scheme has been included within the Labour Supply Housing Demand Variant Scenario. If the proposed Omega development proceeds it could absorb some of the need for jobs identified in the B8 sector. The number of jobs absorbed by Omega and Parkside could lead to a reduction in the amount of land required over the plan period to less than 30ha. However, should Omega development, not proceed, then that need for jobs would have to be met within the St.Helens boundary. Rather than identifying Omega as a source of economic development land to meet demand within St.Helens borough it is intended to indicate a reduction in need and therefore demand for economic land. As this is not currently clear, additional work will be added to the Background Paper to explain its inclusion. Further advice has been sought from the Regional Planning Body regarding the inclusion of Parkside in CE1 but at present a conclusion has not been reached.
Change in Re-Publication Core Strategy
Remove the identification of Parkside and Omega, which implies they make up part of the St Helens Employment Land Supply.

Amend policy CE1, point 1. “Providing at least 3060 hectares”
Amend policy CE1, point 1. “Of additional land for”

Amend policy CE1, point 1. “For economic employment generating purposes to 2026”.

Amend policy CE1, point 1. III Parkside SRFI and Omega North (in Warrington) meeting an element of the demand for B8 Storage and Distribution.

Amend policy CE1, point 2. Should Parkside SRFI and Omega North schemes not proceed then if further allocations to meet the demand will need to be identified, then this is likely to mean assessment of sites within the green belt, which will need to be considered within a sub regional context in accordance with regional policy.

Amend para 15.11 The proposed SRFI at Parkside, Newton Le Willows is a regionally significant development. Parkside Scenarios are included in the review to provide a greater understanding of the impacts on demand and supply. If Parkside precedes it could potentially provide around 7500 jobs. Of these, it is estimated that around 1300 jobs (18%) could be accessed by St Helens residents. The forecast show that Parkside will contribute towards B8 demand but the deficit remains. This is because the specific nature of Parkside could be restrictive to potential local occupiers. If the proposed Parkside development proceeds it is estimated 18% (about 1046) of the jobs could be accessed by St Helens residents. This provision has been factored out deducted from the forecast scenario. This is because the provision of employment land outlined in RSS policy W3 doesn’t include Strategic Rail Freight Interchanges.

Amend paragraph 15.12 The proposed Omega Development is identified in the Regional Economic Strategy as a Strategic/Regional Site and has obtained planning permission. It is recognised that if the proposed development is delivered it could absorb an element of demand for land and floorspace as well as providing opportunities for employment for the residents of St Helens. The review has examined the potential impacts of Omega on the supply of land in the Borough. It has concluded that, based on the assumption that Omega could absorb 25% of the demand in St Helens a substantial deficit between demand and supply would remain. If the proposed Omega North Development proceeds it could potentially compete with St Helens for commercial developments and could provide employment opportunities that could be accessed by the residents of St Helens.

The St Helens Employment Land & Skills Review has examined the potential impacts upon the employment land supply in St Helens if 25% of Omega is taken up by commercial development that may have otherwise opted to develop in St Helens.

Amend paragraph 15.13 If Parkside and Omega are not delivered there will be a need to identify alternative sites in order to address the B8 deficit. This then there may be need to examine the possibility of green belt release to meet demand. Where this is considered strategic in nature, this would need to be assessed through a sub-regional review in accordance with regional policy.

Reason for correction:

i. Earlier calculation of 28ha was later amended to 30ha but correction was not made in this document.

ii. The amendment to CE1 point 1 was not attributable to this representation and should be deleted from this response.

iii. The term ‘factored out’ more accurately reflects the calculation undertaken than deducted.
v. The figure ‘1’ was omitted and read amend paragraph 5.12.
vi. Wording changed before inclusion in final amendment document.
vii. ‘This’ repeated in final sentence, delete repetition.

Policy CE1  A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81816 Mr P Sargeant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1892</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>No</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
The emphasis on B8 (Warehousing) uses is not properly explained - the employment topic paper was not available to explain this.
What changes required?

Council view
No Change Recommended

Justification
Disagree with comment. The emphasis on B8 Warehousing is explained in paragraphs 15.6 to 15.9, in particular 15.9, and by the table below 15.7, namely that the 2009 St. Helens Employment Land and Skills Review identified a shortage of B8 warehousing to meet needs over the life of the Core Strategy.

Change in Re-Publication Core Strategy
No change

Reason for correction: Representation accidentally omitted.

Policy CE1  A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>366518 Roseland/Oakham Developments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1755</td>
</tr>
</tbody>
</table>

If not, why not?
Any other comments?
Why considered unsound?
There are tensions between the justification of policy CE1 and the conclusions in the Parkside Background Paper.
What changes required?

Council view
No Change Recommended

Justification
We are unaware of any tensions between policy CE1 and the Parkside SFRI Background paper.

Change in Re-Publication Core Strategy
No change

Reason for correction: Representation accidentally omitted.
Why considered unsound.. 
(Summarised) The Core Strategy Publication Draft is considered to be unsound in respect to policy CE1. The strategy fails to provide true flexibility that is essential to securing real, sustainable and strong local economy. Certain parts of the green belt no longer serve any useful function to the Green Belt and which could make a real and important contribution to the portfolio of employment sites available in St Helens. CE1 suggests that some review of the green belt will take place if Parkside and Omega do not proceed, this felt to be wholly inappropriate for a variety of reasons. 1) There is a need for certainty in the local economy now not in some unknown point in the future. 2) The local economy requires high quality sites unconstrained by what may happen outside the Borough. 3) The Core Strategy is the appropriate vehicle to examine strategic issues such as green belt. In particular there is a small area of green belt north of Penny Lane and west of the M6 motorway, that serves not function whatsoever in greenbelt terms. However, redevelopment would provide an excellent opportunity for a real and qualitative enhancement of the portfolio of sustainable employment sites.

What changes required? 
(Summarised) The Core Strategy Publication Draft is considered to be unsound in respect to policy CE1. The strategy fails to provide true flexibility that is essential to securing real, sustainable and strong local economy. Certain parts of the green belt no longer serve any useful function to the Green Belt and which could make a real and important contribution to the portfolio of employment sites available in St Helens. CE1 suggests that some review of the green belt will take place if Parkside and Omega do not proceed, this felt to be wholly inappropriate for a variety of reasons. 1) There is a need for certainty in the local economy now not in some unknown point in the future. 2) The local economy requires high quality sites unconstrained by what may happen outside the Borough. 3) The Core Strategy is the appropriate vehicle to examine strategic issues such as green belt. In particular there is a small area of green belt north of Penny Lane and west of the M6 motorway, that serves not function whatsoever in greenbelt terms. However, redevelopment would provide an excellent opportunity for a real and qualitative enhancement of the portfolio of sustainable employment sites.

Council view
No Change Recommended

Justification
RSS Policy RDF 4 identifies that there is no need for any exceptional substantial strategic change to the green belt in Merseyside before 2011. And after 2011 the presumption against exceptional substantial strategic change will remain.

RDF 4 highlights that the Regional Planning Board will investigate with stakeholders the need for change and options for implementation with the findings informing subsequent reviews of the RSS and subsequent reviews of plans and strategies.

5.26 of the RSS highlights that location specific detailed boundary changes to meet exceptional purposes should be dealt with through the LDF process. However, no explanations for what constitutes a location specific detailed boundary change or exceptional substantial strategic change have been provided by GONW. However, it is felt that that the best way forward in terms of reviewing the green belt boundaries with the possibility of releasing land for employment purposes will be through a sub-regional review. This could be carried out in conjunction with work to disaggregate the apportionment of
Calculations based on the St Helens Employment Land & Skills Review highlights that around an additional 40ha of employment land should be provided to meet demand over the plan period. This level of provision has been revised downwards from that indicated in the Preferred Options which was based upon the Economic Land Supply and past take-up rates rather than a robust forecast methodology that examines demand and supply.

The site in question was originally identified as the preferred location for reserved employment land in Haydock in CAS 4.7A in the Preferred Options. However, during the consultation period a number of objections regarding the release of green belt land were received along with comments from the Highways Agency regarding the potential impacts upon J23 of the M6. Further to this, United Utilities have received planning permission to install a pipeline on the site adding to the existing constraints. For these reasons, this policy has not been carried forward into the Core Strategy Publication Draft.

**Change in Re-Publication Core Strategy**
No policy changes required.

<table>
<thead>
<tr>
<th>15.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB757</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Any other comments?**
We suggest that the justification could also include reference to PPS10 & Supplement to PPS1 and the role of the Waste DPD in delivering some of the economic regeneration.

**Why considered unsound..**

**What changes required?**

**Council view**
No Change Recommended

**Justification**
Some waste recycling operations could be considered as B2 or B8 industrial uses as well as being classed as an employment generating uses in draft PPS4. For these reasons there is no requirement to reference PSS10 or PPS1 which would be repetition of national policy and should be avoided. Furthermore it is not appropriate to refer to the Waste DPD as its primary purpose is not to provide employment land and premises or economic regeneration.

**Change in Re-Publication Core Strategy**
No change
Chapter 16 – Safeguarding and Enhancing Quality of Life in St. Helens

Policy CQL 1 Green Infrastructure

Respondent 279821 Clare Olver The Mersey Forest
Representation CSPUB536

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes
If not, why not?

Any other comments?
The Mersey Forest Team welcomes the opportunity that St. Helens has taken to include green infrastructure within its Local Development Framework. A strong green infrastructure policy within the Core Strategy, with back up within Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), will help to realise The Mersey Forest Plan. The policy is generally sound. However, The Mersey Forest would welcome any opportunities to strengthen the approach to green infrastructure with the Core Strategy and subsequent Development Plan Documents and Supplementary Planning Documents as follows: ‘The Mersey Forest, as an existing and effective partnership, should be identified as a key green infrastructure delivery mechanism’. The spatial articulation of green infrastructure plan ‘Use of developer contributions to aid delivery. ‘Recognition that green infrastructure is both privately and publicly owned, and is not just about spaces as such but also components such as street trees, hedgerows etc. ‘Affording some sites absolute protection where their functionality is considered to be absolutely crucial (e.g. a park in the town centre, a key area for nature). Green Infrastructure has an important role to play in adapting for climate change. A recent research project into “Adaptation Strategies for Climate Change in Urban Environments (ASCCUE)” at the University of Manchester has shown that adding 10% green cover to built up areas keeps surface temperatures at current day levels until the 2080s. It also can help us to adapt for increased rainfall and can provide corridors and habitats to allow for the northward migration of wildlife. Key recommendations from ASCCUE, which should be incorporated into planning where possible, were to: ‘Protect critical environmental capital (where green infrastructure assets have a demonstrable level of climate functionality, e.g. city/town centre parks, floodplains, areas where the soil has a high infiltration rate); ‘Ensure no net loss of green cover; ‘Undertake creative greening to enhance green cover. Particular attention should be given to the public realm in town centres to ensure a sufficient range and quality for human comfort, and to new planting in locations where a low greenspace cover combines with socio-economic deprivation and / or human vulnerability; ‘Take opportunities to improve green provision during urban restructuring and new developments; ‘Ensure a water supply for vegetation, in order to sustain the functionality of greenspace during times of drought.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
Agree to add in the Mersey Forest as a key delivery tool in the 'Key Delivery Items' box on page 106 as part of policy CQL 1 and also to the 'Key Delivery Items' box on page 109 as
part of policy CQL 2. Also agree, that trees and woodlands as a form of Green Infrastructure can play an integral role in Climate Change adaptation and mitigation, however, this will be a focus of the Climate Change DPD policy on Climate Change adaptation and mitigation which we are beginning work on late 2009 and will be available for consultation on the Issues and Options paper during summer 2010. Also agree that it is necessary to include a greater definition on what green infrastructure is to include the recognition that GI includes 'Street Trees, hedgerows etc... and that it is not just a series of connected open spaces.

**Change in Re-Publication Core Strategy**
Add 'Delivery of Mersey Forest' into the Key delivery items box on both page 106 and 109 for policies CQL 1 Green Infrastructure and CQL 2 Trees and Woodlands. Also add to paragraph 16.3 'Green Infrastructure is the network of green and blue spaces that lie within and between cities, towns and villages, providing multiple social, economic and environmental benefits. Examples include open spaces, rivers, canals as well as less known examples of street trees and hedgerows'.

<table>
<thead>
<tr>
<th>16.8</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>82491</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB764</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td><strong>Issue raised before?</strong></td>
</tr>
</tbody>
</table>

**Any other comments?**
The network of designated local wildlife sites appears to have been overlooked. They need to be explicitly identified. We suggest insertion of a new paragraph after paragraph 16.8 as follows: “The existing UDP also identified Sites of Community Wildlife Interest and Local Nature Reserves. In addition to their importance for wildlife, these sites form an essential part of the green infrastructure network for the borough and wider sub-region.”

**Why considered unsound..**

**What changes required?**

**Council view**
Agree Recommend Change

**Justification**
Agree that this does appear to have been overlooked and would be a valuable inclusion into the justification for policy CQL 1.

**Change in Re-Publication Core Strategy**
Add sentence at end of paragraph 16.8 last sentence ‘The existing UDP also identifies Sites of Community Wildlife Interest and Local Nature Reserves. In addition to their importance for wildlife, these sites form an essential part of the green infrastructure network for the Borough and wider sub-region’.

<table>
<thead>
<tr>
<th>Policy CQL 2</th>
<th>Trees and Woodlands</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>82491</td>
</tr>
</tbody>
</table>
Any other comments?

We suggest that the CQL policies should be reordered as follows: CQL2 Biodiversity and Geological Conservation (as this is the overarching policy relating to biodiversity); then CQL3 Trees and Woodlands. We also suggest that paragraphs 16.19 -16.21 should be within the justification for the Biodiversity and Geological Conservation policy rather than the Trees and Woodlands policy justification. We further suggest that the justification for the Trees and Woodlands policy is expanded to make it clear why, within the Core Strategy, St Helens considers that trees and woodlands merit a specific policy approach compared to broader biodiversity issues. We suggest that it might be helpful to make stronger links between the Core Strategy and existing and proposed initiatives, for example, Town in the Forest as part of the justification.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
Disagree to re-order policies at this stage of the plan but this can be swapped at adoption. Agree to expand why St. Helens Council feel that trees and woodlands merit a specific policy and make stronger links to existing and proposed initiatives as suggested. However, it is important to note that trees and woodlands have wider benefits than just biodiversity conservation and can play an important role in a variety of schemes including as an economic driver for regeneration.

Change in Re-Publication Core Strategy
Insert following paragraphs into the justification for the Trees and Woodlands policy between paragraphs 16.13 and 16.14: 'Trees are an important part of our environment and their successful retention in new developments is for the benefit of the whole community. The successful retention of healthy trees and planting of new trees as part of a new development can have numerous benefits. Trees can: enhance the landscape character of an area, be a vital component of our green infrastructure, help to create a more positive image of an area and so help to encourage economic, regeneration and inward investment, soften and screen buildings, enhance property prices (property prices in tree lined streets can be worth 18% more than in similar streets without trees), provide a vital role in the urban ecosystem, by helping to support a great variety of wildlife, provide a vital role in supporting biodiversity, save up to 10% of energy consumption through their moderation of the local climate, produce oxygen and help to lock up carbon emissions that contribute to global warming, help to stabilise ground, absorb water, control runoff and so help reduce flood risk, reduce noise by acting as a sound barrier and help to filter out pollution, provide shade, help alleviate the effects of extreme temperature and help to filter out harmful ultra violet radiation, help to reduce the stress of urban living and help to improve mental well being and reduce the stress of urban living'.

Reason for correction: Point is repeated at end of sentence.

Policy CQL 2 Trees and Woodlands
Respondent 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation CSPUB766

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes

If not, why not?

Any other comments?
We suggest under item 3 that this should read “requiring protection for all ancient woodland”.

Why considered unsound..

What changes required?

Council view
No Change Recommended

Justification
Believe that it is important to maintain the use of the term 'absolute' within this sentence as Ancient Woodlands offer a unique habitat resource that is irreplaceable and as such feel the need for the term 'absolute' as requested by the Woodland Trust in the preferred options consultation, to remain. However, this does not undermine the importance of protection for other types of woodlands, habitats and species as 'Ancient Woodlands' are a unique resource and as such cannot set a precedent about the likely protection of other designated sites.

Change in Re-Publication Core Strategy
No change.

16.13 Paragraph

Respondent 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation CSPUB768

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes

If not, why not?

Any other comments?
The text should be amended from “North West Biodiversity Action Plan” to “North West Biodiversity Targets”.

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change
Justification
Partly agree as it is important to take account of the targets that policies need to achieve, thus agree to change sentence to include action plan and targets.

Change in Re-Publication Core Strategy
Amend paragraph 16.13 to ... which is consistent with the Regional Forestry Framework Woodland Strategy, St. Helens Landscape Character Assessment, North West Biodiversity Action Plan and targets, North West Merseyside Action plan and targets, Town in the Forest Initiative and Policy for Nature St. Helens'.

Policy CQL 3 Biodiversity and Geological Conservation

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Miss Lesley Bye</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB774</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
<tr>
<td>Any other comments?</td>
<td>Please add a definition of the term &quot;ecological site appraisal&quot; to the Glossary.</td>
</tr>
</tbody>
</table>

Why considered unsound..

What changes required?

Council view
Partly Agree Recommend Change

Justification
Agree that clarity is needed for the term 'ecological site appraisals', however after additional thought it has been decided to amend the term to 'Ecological Assessments' which will take the form of assessments that consider the ecological significance of sites. Further detail of ecological assessments will be expanded upon within the Biodiversity SPD. This term will not be added to the glossary as the assessment may take many forms and require different criteria per site and thus the Core Strategy does not wish to be too narrow in its focus.

Change in Re-Publication Core Strategy
Policy CQL 3 Part 5 "Requiring all development proposals to be based on ecological site appraisals, where appropriate, including where sites are derelict, vacant or previously developed land.

Policy CQL 3 Biodiversity and Geological Conservation

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Miss Lesley Bye</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB771</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
</tbody>
</table>
If not, why not?

Any other comments?
We suggest that the order of items 2 and 3 should be swapped.

Why considered unsound..

What changes required?

Council view
No change recommended

Justification
Disagree to re-order policies at this stage of the plan but this can be swapped at adoption.

Change in Re-Publication Core Strategy
No change

16.28 Paragraph

Respondent 82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service

Representation CSPUB775

Legally Compliant? Yes Sound? Yes, with minor changes Issue raised before? Yes

If not, why not?

Any other comments?
RIGS are now called Local Geological Sites (LGS) “please update text.

Why considered unsound..

What changes required?

Council view
Agree Recommend Change

Justification
Recognise the change in the term from Regionally Important Geological Sites (RIGS) to Local Geological Sites (LGS). Agree to amend all references within the Core Strategy to LGS, of which a definition have been included within the Glossary.

Change in Re-Publication Core Strategy
Paragraph 16.28 Amend paragraph as follows: ‘Geology remains an important focus of the policy and Regionally Important Geology Sites (RIGS). Local Geological Sites (formerly known as Regionally Important Geological Sites - or RIGS) will be identified on the Proposals Map DPD and fully considered through the planning process, as appropriate. There are currently 2 RIGS 11 LGS in St. Helens as identified through the established Merseyside RIGS LGS group which are:

- Windlehurst Quarry
- Crank Cavern
- Thelto Heath Railway Cutting
- Wargrave Quarry
- Crompton Lane
- Taylor Park Quarry
- The Dingle
- Carr Mill Dam
- Billinge Plantations
- Billinge Quarry
- Shaley Brow Quarry
- Brook 150m ENE of Houghwood Golf Course
- Brook 130m NE of Houghwood Golf Course
- Clinkham Wood North, Mossbank
- Taylor Park

Reason for correction: Taylor Park erroneously included twice.

<table>
<thead>
<tr>
<th>Policy CQL 5</th>
<th>Social Infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82023</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1739</td>
</tr>
<tr>
<td>Ms Rose Freeman</td>
<td>The Theatres Trust</td>
</tr>
</tbody>
</table>

Legally Compliant? Yes  Sound? Yes  Issue raised before?
If not, why not?
Any other comments?

Why considered unsound?
Sound in respect of Policy CQL5 which protects cultural facilities.

What changes required?
No change.

Council view
No Change Recommended

Justification
Comments noted.

Change in Re-Publication Core Strategy
No change.
Chapter 17 – Meeting St. Helens Resource and Infrastructure Needs

<table>
<thead>
<tr>
<th>Policy CR 1</th>
<th>Minerals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>316561 Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB860</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
</tbody>
</table>

**If not, why not?**
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

**Any other comments?**

**Why considered unsound..**
The Coal Authority welcomes the inclusion of a policy identifying Minerals Safeguarding Areas (MSAs) in the Core Strategy and their illustration on the Key Diagram. We assume that the exact boundaries of these areas would be identified on the Proposals Map in due course.

However, The Coal Authority is concerned about the apparent unavailability of a key document of the evidence base, “Mineral Planning on Merseyside 2008”. The document is referred to in paragraph 17.5 as the evidence for informing the location of MSAs, but is not listed in Appendix 2: Bibliography, nor is the report available for inspection on the Council’s website. Without viewing this report it is not possible to support the MSAs identified.

**What changes required?**
Add the “Mineral Planning on Merseyside 2008” report to the evidence base listed in Appendix 2, and make the report available alongside the rest of the LDF evidence base on the Authority’s website.

The Coal Authority might also need to comment further on the selection of MSAs once it has viewed this particular document to understand the rationale behind the Local Planning Authority’s approach.

**Council view**
Agree Recommend Change

**Justification**
Agree. Omission of the report was an error.

**Change in Re-Publication Core Strategy**
SRP17 Mineral Planning on Merseyside 2008 added to evidence base and Council's website.

<table>
<thead>
<tr>
<th>Policy CR 1</th>
<th>Minerals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>316561 Miss Rachael Bust Deputy Head of Planning and</td>
</tr>
</tbody>
</table>
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment Any other comments? 

Why considered unsound..
MPS1, paragraph 9 sets out the objectives for minerals planning, which includes safeguarding all the nation’s minerals resources as far as possible. Our records indicate that approximately 75% of St. Helens District has surface coal resources, and yet only two Minerals Safeguarding Areas are proposed, one of which is outside the coal resource area. Without being able to view the Council’s background evidence it is not possible to understand why the MSAs are so specific and seemingly fail the requirement under MPS1 to ensure that proven resources of coal are not needlessly sterilised by non-mineral development. Nowhere in the explanatory text to this policy does it set out what mineral opportunities there are at Garswood, so we are unsure as to whether or not this area has been identified for its coal resources. Specific information on coal is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence.

What changes required?

Council view
Partly Agree Recommend Change

Justification
It is acknowledged that evidence shows that a significant proportion of St Helens has surface coal resources, and also the difficulty the Coal Authority is having to interpret policy CR1 without having sight of the mineral evidence base report. Its omission from the evidence base was an oversight that was subsequently rectified. An assessment of mineral resources on Merseyside has been undertaken to identify potentially viable deposits and indicate where exploitation of deposits is significantly constrained by existing development and other environmental and planning factors. Constraints including the pattern and location of existing urban areas and existing transport infrastructure have been identified as major limiting factors influencing whether a known resource is economically viable to work in St Helens. Whilst there is significant coal resource in St Helens, the assessment recommended that only two locations within the district would benefit from mineral safeguarding for their potential to have economically exploitable mineral resources. The BGS Mineral Resource Map for Merseyside indicates that there are deep coal seams at the southern most portion of the district (not covered by the Coal Authority shallow coal resource layer). However, this area would not benefit from mineral safeguarding as the resource can only be exploited via deep mining and is unlikely to be sterilised by new surface development. Garswood has been identified for its coal resources, based on known commercial interest in the site. The justification should be expanded to further explain the limit of the MSAs and the minerals they seek to safeguard.

Change in Re-Publication Core Strategy
Para. 17.7 be expanded to indicate:
− the existing sand quarry at Bold Heath, which has permission for extraction of sand/sandstone; and
− land between Garswood Old Road and Arch Lane, Garswood, where
there is known commercial interest in the surface coal resource.

17.8  Paragraph

<table>
<thead>
<tr>
<th>Respondent</th>
<th>315762</th>
<th>Mrs Dianne Wheatley</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB402</td>
<td>Government Office for the Northwest</td>
</tr>
</tbody>
</table>

Legally Compliant?  Yes  Sound?  Yes  Issue raised before?  No

If not, why not?
New information

Any other comments?
Minor textual comment

Why considered unsound..
paragraphs 17.7-17.10 It would be useful to mention main conclusions of background study, such as why Parkside isn’t included?

What changes required?
Include main conclusions of background Merseyside study

Council view
No change recommended

Justification
The report makes no reference to Parkside as it is no longer an economically viable colliery.

Change in Re-Publication Core Strategy
No change

Policy CR 2  Waste

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81648</th>
<th>Dawn Hewitt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB736</td>
<td>Environment Agency (NW Regional Office)</td>
</tr>
</tbody>
</table>

Legally Compliant?  Yes  Sound?  Yes, with minor changes  Issue raised before?  No

If not, why not?
identified in the Sustainability Appraisal

Any other comments?

Why considered unsound..
We feel this policy should be worded more strongly as identified in section 5.3.21 of the Sustainability Appraisal

What changes required?
'Instead of stating that the Council will "encourage"good design in new development in order to minimise waste and promote the use of recycled materials, it will be better to state that any new development "should demonstrate how" it will minimise, re-use and recover during development construction and operation. There should be a clearer focus on waste minimisation and recovery during operation.'
Council view
No Change Recommended

Justification
A joint Waste DPD is being produced which addresses such issues in greater detail. The preferred options currently propose a policy requiring all types of development to consider waste prevention and resource management. The mechanism for implementing such a requirement needs further investigation. It is proposed to maintain the current policy wording which does not preclude stronger wording being brought forward through the Waste DPD.

Change in Re-Publication Core Strategy
No change recommended

<table>
<thead>
<tr>
<th>17.14</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>315762</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB371</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td>Minor comment</td>
</tr>
<tr>
<td><strong>Any other comments?</strong></td>
<td>Minor textual comment</td>
</tr>
<tr>
<td><strong>Why considered unsound..</strong></td>
<td>Add date to diagram as will change in future</td>
</tr>
<tr>
<td><strong>What changes required?</strong></td>
<td>Add date to diagram</td>
</tr>
<tr>
<td><strong>Council view</strong></td>
<td>Agree Recommend Change</td>
</tr>
<tr>
<td><strong>Justification</strong></td>
<td>Agree further clarity needed.</td>
</tr>
</tbody>
</table>

Change in Re-Publication Core Strategy
Title of diagram at 17.14 to read "Waste Arisings on Merseyside 2008"

<table>
<thead>
<tr>
<th>17.17</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Respondent</strong></td>
<td>315762</td>
</tr>
<tr>
<td><strong>Representation</strong></td>
<td>CSPUB403</td>
</tr>
<tr>
<td><strong>Legally Compliant?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>If not, why not?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Any other comments?</strong></td>
<td>Minor textual comment</td>
</tr>
<tr>
<td><strong>Why considered unsound..</strong></td>
<td>Timetable for Waste DPD needs updating</td>
</tr>
</tbody>
</table>
What changes required?
Update Waste DPD timetable

Council view
Agree Recommend Change

Justification
Agree to change

Change in Re-Publication Core Strategy
First sentence of paragraph 17.17 amended to read "it is intended to adopt the joint Waste DPD by April 2012 February 2011"
Chapter 18 – Appendix 1: Delivery & Monitoring Strategy

1 Appendix 1: Delivery and Monitoring Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Respondent Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>315762</td>
<td>Mrs Dianne Wheatley, Spatial Development Manager, Government Office for the North West</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Representation</th>
<th>CSPUB363</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes, with minor changes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

This relates to the test of the policies being effective

Why considered unsound..

While we understand that the Council have tried to address delivery in this chapter, it would be strengthened if more of a commentary were included for those proposals/actions critical to the Core Strategy’s delivery and those expected to be delivered in the next 5 years, so that it can be understood how such proposals will be coming forward e.g. for example, has funding been secured, how will any problems be overcome such as critical infrastructure, any contingencies/flexibility, signup by major players etc? We understand that you had gathered a lot of information on delivery, so hopefully this can be addressed by adding the extra detail.

What changes required?

Include additional information on how key proposals/actions will be delivered

Council view

Partly Agree Recommend Change

Justification

The Council agrees that some additional information can be provided for some of the items listed in the Delivery and Monitoring Strategy

Change in Re-Publication Core Strategy

Provide additional information regarding key delivery items.

1 Appendix 1: Delivery and Monitoring Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Respondent Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>81908</td>
<td>J M Carter, Rainhill Civic Society</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Representation</th>
<th>CSPUB1774</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Sound?</th>
<th>Issue raised before?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If not, why not?

Any other comments?

Requirement to provide two new trees for every one lost is extremely optimistic and no detail is given of the proposed increase from 7 conservation areas to 10.

Why considered unsound.
What changes required?

Council view
No Change Recommended

Justification
The requirement to provide replacement trees on a 2:1 basis is included in policy CQL 2.4 and was previously included in UDP policy ENV 12b. The increase from 7 to 10 refers to management plans for the existing 10 conservation areas, and is not an increase in actual numbers of conservation areas. This is currently being undertaken.

Change in Re-Publication Core Strategy
No change

<table>
<thead>
<tr>
<th>1.2</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>315762</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB406</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No</td>
</tr>
</tbody>
</table>

If not, why not?
New information

Any other comments?
Minor textual changes

Why considered unsound..
Policy CAS1- will Merseytravel also be adding funding to the Park and Ride facilities at Lea Green and St Helens junction? References to LDS need to be updated re: date (May 2009). There are no targets/indicators for minerals and waste: suggest national core indicators are included. The Joint Greater Merseyside Waste DPD needs to be included on the key delivery items for policy CR2.

What changes required?
Clarify funding under CAS1 in Appendix 1 Update references to LDS Include national targets for minerals and waste

Council view
Agree Recommend Change

Justification
Generally more details regarding funding are required in all elements of Appendix1. All references throughout the document will be updated including reference to LDS. None inclusion of minerals and waste indicators and the Waste DPD as a delivery item was an oversight and these will be included in Appendix 1

Change in Re-Publication Core Strategy
Add more details on funding sources and whether confirmed or not for all delivery items in Appendix 1. Ensure all references throughout Core Strategy are updated to latest versions of document. Include Core Indicators W1, W2, M1 and M2 in Appendix 1 against policies CR1 and CR2. Add Waste DPD as a key delivery in Appendix 1 against policy CR2.
Respondent 315762 Mrs Dianne Wheatley Spatial Development Manager Government Office for the North west

Representation CSPUB404

Legally Compliant? Yes Sound? Yes Issue raised before? No

If not, why not?
New information

Any other comments?
Minor textual comment

Why considered unsound..
Policy CIN1 appears to be missing from list

What changes required?
Include policy CIN1 in Appendix 1

Council view
No Change Recommended

Justification
Policy CIN1 is already covered on page 142 of the Publication version of the Core Strategy. No change is therefore necessary.

Change in Re-Publication Core Strategy
No change

1.3 Paragraph

Respondent 315747 Mr Kieran Preston Planning and Conservation Adviser Natural England

Representation CSPUB504

Legally Compliant? Yes Sound? Yes Issue raised before? No

If not, why not?

Any other comments?
We would welcome in section SA6 CQL3 Biodiversity and Geological Conservation a key delivery item for geodiversity, for example, number of local geological sites (RIGS) in favourable management.

Why considered unsound..

What changes required?

Council view
No change recommended

Justification
We support the comment made about the inclusion of an indicator to measure geological sites. Due to staff resources and time, implementing management plans for all Local Geology Sites in currently impractical. However, as and where possible Local Geology Sites will be included within site management plans. Additionally, all Local Wildlife Sites
(LWS) and Local Important Geology Sites (LIGS) are covered within indicator NI 197. Improved local biodiversity - proportion of local sites where positive management has or is being implemented' and the aim will be for all LWS and LIGS to be part of management plans. This indicator is currently included within CQL 3 'Target and Indicators' section within Appendix 1: Delivery and Monitoring Strategy in the Core Strategy document.

Change in Re-Publication Core Strategy
No change
Chapter 19 – Appendix 2: Bibliography

<table>
<thead>
<tr>
<th>2</th>
<th>Appendix 2: Bibliography</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82491</td>
</tr>
<tr>
<td>Merseyside Environmental Advisory Service</td>
<td></td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB785</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Yes</td>
</tr>
<tr>
<td>Sound?</td>
<td>Yes, with minor changes</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>Yes</td>
</tr>
<tr>
<td>If not, why not?</td>
<td></td>
</tr>
</tbody>
</table>

Any other comments?

Please add the following items to the Bibliography under National Policy and Circulars: Habitats Regulations Circular on Biodiversity and Geological Conservation (companion to PPS9) SEA Regulations

Add the following items to the Bibliography under Sub-regional Policies and Strategies: North Merseyside Biodiversity Action Plan Review 2007

Why considered unsound..

What changes required?

Council view

Agree Recommend Change

Justification

Agree that it is important to have an up to date bibliography in place and agree to reference additional documents.

Change in Re-Publication Core Strategy

Add under National Policy and Circulars: Habitats Regulations Circular on Biodiversity and Geological Conservation (companion to PPS9) SEA Regulations

Agree to add under Sub-regional policies and strategies: North Merseyside Biodiversity Action Plan Review 2007
### Chapter 20 – Appendix 3: Glossary of Terms

<table>
<thead>
<tr>
<th>Respondent</th>
<th>82491</th>
<th>Miss Lesley Bye</th>
<th>Contaminated Land Team Leader Merseyside Environmental Advisory Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB789</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legally Compliant?</th>
<th>Yes</th>
<th>Sound?</th>
<th>Yes, with minor changes</th>
<th>Issue raised before?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>If not, why not?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Any other comments?**

Please add the following items to the Glossary: Local Wildlife Site (LWS): A site designated for its important biodiversity features using guidelines adopted across north Merseyside. Local Geological Site (LGS): A site designated for its important geodiversity features using guidelines adopted across north Merseyside. Local Nature Reserve. Please amend the following: Under Sites of Special Scientific Interest, please amend 'English Nature' to 'Natural England'. We suggest that the two references to Contaminated Land on page 155 should be amended to 'Land Affected by Contamination' with the following definition: 'land where the actual or suspected presence of substances in, on or under the land may cause risks to people, property, human activities or the environment regardless of whether or not the land meets the definition of contaminated land in Part IIA of the Environmental Protection Act 1990. This change provides consistency with PPS 23 and avoids confusion with the statutory term 'contaminated land' and its definition. The above definition also does not distinguish between natural and man-made sources of contamination, both of which need to be considered.

**Why considered unsound..**

**What changes required?**

**Council view**

Agree Recommend Change

**Justification**

Agree to add in the definition of both 'Local Wildlife Site' and 'Local Geological Site' and welcome the attached definitions. Also agree to alter 'English Nature' to 'Natural England' and proof read the document to check this has not occurred elsewhere. Also agree to alter the terminology of 'contaminated land' to 'land affected by contamination' to be in conformity with PPS 23, however, will need to proof read the document and make amendments throughout the document as and where necessary.

**Change in Re-Publication Core Strategy**

Insert definitions of - Local Wildlife Site: 'A site designated for its important biodiversity features using guidelines adopted across North Merseyside' and Local Geological Site: 'A site designated for its important geodiversity features using guidelines adopted across North Merseyside Local Nature Reserves'. Also, amend all references to 'English Nature' throughout the document to 'Natural England'. Also, amend all references to 'contaminated land' to 'land affected by contamination' in line with PPS 23. Insert definition Land affected by contamination: 'land where the actual or suspected presence of substances in, on or on
under the land may cause risk to people, property, human activities or the environment regardless of whether or not the land meets the definition of contaminated land in Part IIA of the Environmental Protection Act 1990’.
**Appendix 1 – List of those submitting a valid cyclostyled form**

<table>
<thead>
<tr>
<th>Ms</th>
<th>Carol</th>
<th>?</th>
<th>*Mrs Barbara</th>
<th>Astles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr</td>
<td>David</td>
<td>?</td>
<td>*Mr Brian</td>
<td>Astles</td>
</tr>
<tr>
<td>Ms</td>
<td>Patricia</td>
<td>Aaron</td>
<td>Mr Peter</td>
<td>Astles</td>
</tr>
<tr>
<td>Miss</td>
<td>Rachel</td>
<td>Aaron</td>
<td>Mr Brian</td>
<td>Atherton</td>
</tr>
<tr>
<td>*Mrs</td>
<td>Dianne</td>
<td>Aaronson</td>
<td>Mr Derek</td>
<td>Atherton</td>
</tr>
<tr>
<td>Mr</td>
<td>Philip</td>
<td>Aaronson</td>
<td>Mrs Josephine Ann</td>
<td>Atherton</td>
</tr>
<tr>
<td>*Mrs</td>
<td>Dorothy</td>
<td>Abey</td>
<td>Mr Peter</td>
<td>Atherton</td>
</tr>
<tr>
<td>*Mr</td>
<td>Geoffrey</td>
<td>Abey</td>
<td>Ms Shirley Ann</td>
<td>Atherton</td>
</tr>
<tr>
<td>*Mr</td>
<td>Richard</td>
<td>Ablett</td>
<td>Mr Nick</td>
<td>Atkin</td>
</tr>
<tr>
<td>Miss</td>
<td>Ann</td>
<td>Adams</td>
<td>Mrs Katherine</td>
<td>Atkins</td>
</tr>
<tr>
<td>Mrs</td>
<td>Celia</td>
<td>Adamson</td>
<td>Mrs Lynn</td>
<td>Atkins</td>
</tr>
<tr>
<td>Miss</td>
<td>Jennifer</td>
<td>Addison</td>
<td>Mrs Sheila</td>
<td>Axton</td>
</tr>
<tr>
<td>*Mr</td>
<td>Wilfred</td>
<td>Addison</td>
<td>Mr Jeff</td>
<td>Baddley</td>
</tr>
<tr>
<td>Mrs</td>
<td>Lynette Maria</td>
<td>Alberta</td>
<td>Mr Matthew</td>
<td>Baddley</td>
</tr>
<tr>
<td>Mrs</td>
<td>Jayne</td>
<td>Alcock</td>
<td>Mr Andrew</td>
<td>Bailey</td>
</tr>
<tr>
<td>*Mr</td>
<td>Arthur</td>
<td>Alderson</td>
<td>Mr Sucha Singh</td>
<td>Bains</td>
</tr>
<tr>
<td>Mrs</td>
<td>June</td>
<td>Alderson</td>
<td>*Mrs Helen Claire</td>
<td>Baker</td>
</tr>
<tr>
<td>Mrs</td>
<td>Jill</td>
<td>Allen</td>
<td>*Mrs Marina</td>
<td>Baker</td>
</tr>
<tr>
<td>Mr</td>
<td>Joshua</td>
<td>Allen</td>
<td>Mr Richard</td>
<td>Ball</td>
</tr>
<tr>
<td>Miss</td>
<td>Samantha</td>
<td>Allen</td>
<td>*Mr Robert Neill</td>
<td>Ball</td>
</tr>
<tr>
<td>*Mr</td>
<td>Steve</td>
<td>Allen</td>
<td>Mrs Ruth</td>
<td>Ball</td>
</tr>
<tr>
<td>*Mrs</td>
<td>Valerie</td>
<td>Allen</td>
<td>Mrs Lisa</td>
<td>Banken</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret Alice</td>
<td>Almond</td>
<td>*Mrs Irene</td>
<td>Banks</td>
</tr>
<tr>
<td>Mrs</td>
<td>Judith</td>
<td>Anderson</td>
<td>Mrs Maureen</td>
<td>Banks</td>
</tr>
<tr>
<td>*Mr</td>
<td>Glyn</td>
<td>Andrew</td>
<td>Mr Denis</td>
<td>Barclay</td>
</tr>
<tr>
<td>Mrs</td>
<td>Susan</td>
<td>Andrew</td>
<td>Mr Graham</td>
<td>Barker</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Antrobus</td>
<td>Mrs Mary Clara</td>
<td>Barker</td>
</tr>
<tr>
<td>Mrs</td>
<td>Susanne</td>
<td>Antrobus</td>
<td>Mr Michael</td>
<td>Barlow</td>
</tr>
<tr>
<td>Mrs</td>
<td>Dorothy</td>
<td>Appleton</td>
<td>Mrs Marilyn</td>
<td>Barnham</td>
</tr>
<tr>
<td>*Mrs</td>
<td>Ivy</td>
<td>Appleton</td>
<td>Mr Christopher</td>
<td>Baron</td>
</tr>
<tr>
<td>Mr</td>
<td>Roy</td>
<td>Appleton</td>
<td>Miss Phillipa</td>
<td>Barony</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael</td>
<td>Armitage</td>
<td>*Mrs Angela Mary</td>
<td>Barrett</td>
</tr>
<tr>
<td>Mrs</td>
<td>Sylvia</td>
<td>Armitage</td>
<td>Miss Catherine</td>
<td>Barrett</td>
</tr>
<tr>
<td>Mrs</td>
<td>Armstrong</td>
<td></td>
<td>Miss Nicola</td>
<td>Baseley</td>
</tr>
<tr>
<td>Miss</td>
<td>Lynn</td>
<td>Arrowsmith</td>
<td>Mrs Elisabeth</td>
<td>Basson</td>
</tr>
<tr>
<td>Mr</td>
<td>Bryan</td>
<td>Ashcroft</td>
<td>Mr Keith</td>
<td>Basson</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret</td>
<td>Ashcroft</td>
<td>Miss Lizzy</td>
<td>Batchelor</td>
</tr>
<tr>
<td>*Mrs</td>
<td>Winifred</td>
<td>Ashcroft</td>
<td>Mrs Susan</td>
<td>Batchelor</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Ashford</td>
<td>Mrs Lorraine</td>
<td>Batters</td>
</tr>
<tr>
<td>*Mr and</td>
<td>Clare and Carl</td>
<td>Ashton</td>
<td>Mr Chris</td>
<td>Battersby</td>
</tr>
<tr>
<td>*Mr</td>
<td>Jonathan Mark</td>
<td>Ashworth</td>
<td>Mr Paul Phillip</td>
<td>Battersby</td>
</tr>
<tr>
<td>Mrs</td>
<td>Barbara</td>
<td>Aspinall</td>
<td>Mrs Rosemary</td>
<td>Battersby</td>
</tr>
<tr>
<td>Miss</td>
<td>Karen</td>
<td>Aspinall</td>
<td>Mrs Jean</td>
<td>Baxter</td>
</tr>
<tr>
<td>Mr</td>
<td>Peter</td>
<td>Aspinall</td>
<td>Mr John</td>
<td>Baxter</td>
</tr>
<tr>
<td>Ms</td>
<td>Alison</td>
<td>Astles</td>
<td>Mr James</td>
<td>Beardsmore</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>*Mr Graham</td>
<td>Beattie</td>
</tr>
</tbody>
</table>
Mr Raymond Frank Brown
Mr William Harry Brown
Mr Eric Brownbill
Mr James Edward Browning
Mrs Marjorie Browning
Mr Frank Kenneth Bryce
Mrs Jane Buckley
Mr David Bullough
Mrs Lucy Bullough
Mrs Barbara Bulmer
Mr James Bulmer
Mrs Melsom Bulmer
Mrs Thelma Dorothy Bulmer
Mr Thomas Bulmer
Mr Frank Bunting
Mrs Margaret Bunting
Mr Kenneth I Bulmer
Mr Ian Burns
Mr Peter Michael Burns
Mrs Alison Burt
Mr Mike Burt
Mrs Pauline Butler
Mr Joseph Butler
Mrs Kathleen Butler
Mr Mark Byatt
Mrs Rachel Byatt
Mr Frances Bywater
Mr Mark Bywater
Mr Barry Cain
Mr Christopher Calderbank
Mr James Callis
Mrs Sue Callis
Mr Andrew Cameron
Mr Colin Campbell
Mrs Elaine Campbell
Cllr Paul Campbell
Mr Hugh Carey
Mr Graham Carlon
Mrs Pauline Carlon
Miss Debbie Carol
Miss Deborah Carroll
Mrs Audrey Carswell
Mrs Mary Carswell
Mr Philip Cassin
Mrs Jean Carter
Mr Roy Carter
Mr James Cassidy
Mr Paul Cassin
Mr Lee Castle
Mrs Susan Castle
Mrs Louise Causley
Mr Austin Austin
Miss Aimee Aimee
Mrs Catherine Cetiner
Mr Safer Cetiner
Mrs Bess Chadwick
Mr Gareth Chadwick
Mr and Mrs Ian and Yvonne Chadwick
Mr John Chadwick
Mrs Ann Chapman
Mr John Chapman
Mrs Mary Charleston
Ms Samantha Chitryn
Mr Martin Chitryn
Mr Matthew Chitryn
Ms Melanie Chitryn
Mr and Mrs Fred and Joan Chisnall
Ms Jennifer Suzanne Chisnall
Mr Andrew Chorley
Mr James Clare
Mr John Leslie Clare
Mrs Patricia Clare
Miss Andrea Clarke
Mr Sandra Clarke
Mr Ian Claughton
Mr Jake Lewis Clayton
Mrs Joanne Clayton
Mr Mark Clayton
Mrs Elaine Clews
Mr Robert Clews
Miss Charlotte Clipston
Ms Janet Clipston
Mrs Eileen Close
Mrs Thamra Clowes
Mrs Joanne Coatsworth
Mr Paul Coatsworth
Mrs Joan Cobell
Mr Brian Cockram
Mrs Sheila Cockram
Mr and Mrs Andrew and Andrea Collins
Mr Ray Colquitt
Miss Marie Colquitt
Mr Matthew Colton
Mrs Suzanne Colton
Mrs Margaret Conalty
Mrs Fiona MND Coleman
Mr George Collier
Mr and Mrs Ray and Andrea Collins
Mr Ray Colquitt
Miss Marie Colquitt
Mr Matthew Colton
Mrs Suzanne Colton
Mrs Margaret Colnalty
<table>
<thead>
<tr>
<th>Mrs</th>
<th>Janet</th>
<th>Connah</th>
<th>Mr</th>
<th>Mark</th>
<th>Cunliffe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr</td>
<td>Sidney Keith</td>
<td>Connah</td>
<td>Mr</td>
<td>Philip</td>
<td>Cunningham</td>
</tr>
<tr>
<td>Mrs</td>
<td>Emma</td>
<td>Connor</td>
<td>Mr</td>
<td>Douglas</td>
<td>Curry</td>
</tr>
<tr>
<td>Ms</td>
<td>Carole</td>
<td>Conroy</td>
<td>Mr</td>
<td>Christopher</td>
<td>Curties</td>
</tr>
<tr>
<td>Mrs</td>
<td>Shelagh</td>
<td>Conroy</td>
<td>Mr</td>
<td>Kenneth</td>
<td>Dale</td>
</tr>
<tr>
<td>Mr</td>
<td>Simon John</td>
<td>Conroy</td>
<td>Mrs</td>
<td>Muriel</td>
<td>Dale</td>
</tr>
<tr>
<td>Mrs</td>
<td>Dorothy</td>
<td>Constantine</td>
<td>Mrs</td>
<td>Anne</td>
<td>Dallas</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret</td>
<td>Conway</td>
<td>Mr</td>
<td>John</td>
<td>Dallas</td>
</tr>
<tr>
<td>Mr</td>
<td>Richard</td>
<td>Conway</td>
<td>Mrs</td>
<td>Isobelle R</td>
<td>Dasey</td>
</tr>
<tr>
<td>Mrs</td>
<td>Dorothy</td>
<td>Cook</td>
<td>Mrs</td>
<td>Joan</td>
<td>Davenport</td>
</tr>
<tr>
<td>Mr</td>
<td>Simon</td>
<td>Cook</td>
<td>Mr</td>
<td>Roy</td>
<td>Davenport</td>
</tr>
<tr>
<td>Ms</td>
<td>Kenneth</td>
<td>Cooke</td>
<td>Mr</td>
<td>Allan</td>
<td>Davies</td>
</tr>
<tr>
<td>Ms</td>
<td>Deborah</td>
<td>Cooper</td>
<td>Mr</td>
<td>Amanda</td>
<td>Davies</td>
</tr>
<tr>
<td>Mr</td>
<td>Howard</td>
<td>Cooper</td>
<td>Mr</td>
<td>Christopher</td>
<td>Davies</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Cooper</td>
<td>Mr</td>
<td>Donald</td>
<td>Davies</td>
</tr>
<tr>
<td>Mrs</td>
<td>Marie</td>
<td>Cooper</td>
<td>Mr</td>
<td>Donald</td>
<td>Davies</td>
</tr>
<tr>
<td>Mr</td>
<td>Mark</td>
<td>Cooper</td>
<td>Mr</td>
<td>Geoffrey</td>
<td>Davies</td>
</tr>
<tr>
<td>Mrs</td>
<td>Tracey</td>
<td>Cooper</td>
<td>Dr</td>
<td>Kate</td>
<td>Davies</td>
</tr>
<tr>
<td>Mrs</td>
<td>Elizabeth</td>
<td>Copple</td>
<td>Mrs</td>
<td>Marian</td>
<td>Davies</td>
</tr>
<tr>
<td>Mr</td>
<td>Sean</td>
<td>Corcoran</td>
<td>Mrs</td>
<td>Olive May</td>
<td>Davies</td>
</tr>
<tr>
<td>Mrs</td>
<td>Phil</td>
<td>Cotterell</td>
<td>Mr</td>
<td>Richard</td>
<td>Davies</td>
</tr>
<tr>
<td>Mrs</td>
<td>Diane Marie</td>
<td>Cotton</td>
<td>Mr</td>
<td>Anthony</td>
<td>Davin</td>
</tr>
<tr>
<td>Mr</td>
<td>James</td>
<td>Cotton</td>
<td>Mrs</td>
<td>Gillian</td>
<td>Davin</td>
</tr>
<tr>
<td>Mrs</td>
<td>Adele</td>
<td>Couch</td>
<td>Mrs</td>
<td>Jennifer Pauline</td>
<td>Dawber</td>
</tr>
<tr>
<td>Mr</td>
<td>Bernard</td>
<td>Court</td>
<td>Mr</td>
<td>William</td>
<td>Dawber</td>
</tr>
<tr>
<td>Mrs</td>
<td>Mary</td>
<td>Crane</td>
<td>Mrs</td>
<td>Helen</td>
<td>Daxon</td>
</tr>
<tr>
<td>Mrs</td>
<td>Francis</td>
<td>Craven</td>
<td>Mrs</td>
<td>Lilian</td>
<td>De Looze</td>
</tr>
<tr>
<td>Mr &amp;</td>
<td></td>
<td></td>
<td>Mrs</td>
<td>Samantha</td>
<td>Dean</td>
</tr>
<tr>
<td>Mrs</td>
<td>Alistair &amp; Nicola</td>
<td>Crawford</td>
<td>Mrs</td>
<td>Sheila M</td>
<td>Dean</td>
</tr>
<tr>
<td>Mr</td>
<td>Neil</td>
<td>Crawford</td>
<td>Mr</td>
<td>John Arthur</td>
<td>Denton</td>
</tr>
<tr>
<td>Mrs</td>
<td>Anne</td>
<td>Crellin</td>
<td>Mrs</td>
<td>Rita</td>
<td>Denton</td>
</tr>
<tr>
<td>Ms</td>
<td>D</td>
<td>Critchley</td>
<td>Miss</td>
<td>Andik</td>
<td>Deviana</td>
</tr>
<tr>
<td>Mrs</td>
<td>Kat</td>
<td>Critchley</td>
<td>Mrs</td>
<td>Pat</td>
<td>Devlin</td>
</tr>
<tr>
<td>Mrs</td>
<td>Lindsey</td>
<td>Critchley</td>
<td>Mrs</td>
<td>Ethel</td>
<td>Dickens</td>
</tr>
<tr>
<td>Mrs</td>
<td>Michelle</td>
<td>Croft</td>
<td>Mrs</td>
<td>Gill</td>
<td>Dickinson</td>
</tr>
<tr>
<td>Mr</td>
<td>Arthur</td>
<td>Crompton</td>
<td>Mrs</td>
<td>J Edna</td>
<td>Dickinson</td>
</tr>
<tr>
<td>Mr</td>
<td>Geoffrey</td>
<td>Crompton</td>
<td>Mr</td>
<td>Keith</td>
<td>Dickinson</td>
</tr>
<tr>
<td>Mrs</td>
<td>Janet</td>
<td>Crompton</td>
<td>Mrs</td>
<td>Mary Evelyn</td>
<td>Dickinson</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Crook</td>
<td>Mrs</td>
<td>Stephanie</td>
<td>Dinnell</td>
</tr>
<tr>
<td>Mrs</td>
<td>Vilma</td>
<td>Crook</td>
<td>Mr</td>
<td>Paul</td>
<td>Dixon</td>
</tr>
<tr>
<td>Mr</td>
<td>Eric</td>
<td>Cross</td>
<td>Mr</td>
<td>John and Monica</td>
<td>Dobbs</td>
</tr>
<tr>
<td>Miss</td>
<td>Helen</td>
<td>Crossley</td>
<td>Mrs</td>
<td>Patricia</td>
<td>Dobbs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Carole</td>
<td>Crowe</td>
<td>Mrs</td>
<td>Mavis</td>
<td>Dobson</td>
</tr>
<tr>
<td>Mrs</td>
<td>Mary</td>
<td>Crowshaw</td>
<td>Mr</td>
<td>John</td>
<td>Doherty</td>
</tr>
<tr>
<td>Mrs</td>
<td>Barbara</td>
<td>Crye</td>
<td>Miss</td>
<td>Sheila</td>
<td>Dolan</td>
</tr>
<tr>
<td>Mr</td>
<td>R</td>
<td>Crye</td>
<td>Mrs</td>
<td>Lily</td>
<td>Donaldson</td>
</tr>
<tr>
<td>Miss</td>
<td>Collete Mary</td>
<td>Cullen</td>
<td>Mr</td>
<td>Craig</td>
<td>Donnelly</td>
</tr>
<tr>
<td>Mr</td>
<td>Kirk</td>
<td>Cunliffe</td>
<td>Mrs</td>
<td>Vanessa</td>
<td>Donnelly</td>
</tr>
<tr>
<td>Name</td>
<td>Surname</td>
<td>Name</td>
<td>Surname</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------</td>
<td>-------------------------</td>
<td>---------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Peter</td>
<td>Dooley</td>
<td>Mr Colin</td>
<td>Eels</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr George</td>
<td>Dooner</td>
<td>Mrs Gillian</td>
<td>Eels</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marie</td>
<td>Dooner</td>
<td>Miss Alice</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Sarah</td>
<td>Doran</td>
<td>Miss Elizabeth</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen</td>
<td>Doran</td>
<td>Mr James</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr and Mrs</td>
<td>Frank and Brenda</td>
<td>Mrs Mary</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Lyn</td>
<td>Doward</td>
<td>Mr Stephen</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Elaine</td>
<td>Dowling</td>
<td>Mr William</td>
<td>Ellam</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr James</td>
<td>Downie</td>
<td>Mrs Maureen</td>
<td>Ellison</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs John</td>
<td>Drinkwater</td>
<td>Mrs Marion Brenda</td>
<td>Elwell</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Maureen</td>
<td>Drinkwater</td>
<td>Mr &amp; Mrs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Sarah</td>
<td>Dudley</td>
<td>Mrs Joanna</td>
<td>Emanuel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Alan</td>
<td>Duerden</td>
<td>Mrs Gwen</td>
<td>Emegbo</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Ann</td>
<td>Duerden</td>
<td>Mr Stephen</td>
<td>Emegbo</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Madeline</td>
<td>Duggan</td>
<td>Mrs Joan</td>
<td>Emerton</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Anthony</td>
<td>Dunford</td>
<td>Mr Mike</td>
<td>Emerton</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Joan</td>
<td>Dunn</td>
<td>Mr Brandon</td>
<td>Emmett</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Robert</td>
<td>Dunn</td>
<td>Mrs Caroline</td>
<td>Enever</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Dawn</td>
<td>Dunne</td>
<td>Mr Peter</td>
<td>Enever</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Sean</td>
<td>Dunne</td>
<td>Mr Collin</td>
<td>Eustace</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Brian</td>
<td>Durkin</td>
<td>Mr Brian</td>
<td>Evans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Gary</td>
<td>Duxbury</td>
<td>Ms Irene</td>
<td>Evans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Leanda</td>
<td>Duxbury</td>
<td>Mrs Patricia</td>
<td>Evans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Barbara</td>
<td>Dykes</td>
<td>Mr Peter</td>
<td>Fairbrother</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Barbara</td>
<td>Dykes</td>
<td>Mrs Sandra</td>
<td>Fairclough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Gerard</td>
<td>Dykes</td>
<td>Mrs Gwen</td>
<td>Fairfoull</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Dykes</td>
<td>Mrs Anie</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Victoria</td>
<td>Dykes</td>
<td>Mrs Anne</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Carol</td>
<td>Eagle</td>
<td>Mr Cyril</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>Eagle</td>
<td>Mr Keith</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>Eaves</td>
<td>Mrs Pauline</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Elsie</td>
<td>Eaves</td>
<td>Mrs Rachael</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Ernest</td>
<td>Eaves</td>
<td>Ms Rita</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Glenys</td>
<td>Eaves</td>
<td>Mr Roy</td>
<td>Fairhurst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Joan</td>
<td>Eaves</td>
<td>Mr Alan</td>
<td>Fairlamb</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Alicia</td>
<td>Eccles</td>
<td>Mrs Ann</td>
<td>Fairlamb</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Elaine</td>
<td>Eccles</td>
<td>Mrs Janet</td>
<td>Falliding</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Felicity</td>
<td>Eccles</td>
<td>Mr Stephen</td>
<td>Farrell</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Frank</td>
<td>Eccleston</td>
<td>Mrs Victoria</td>
<td>Farrell</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Keith</td>
<td>Eccleston</td>
<td>Mr Frederick</td>
<td>Farrimond</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Norman</td>
<td>Eckersley</td>
<td>Mr Simon</td>
<td>Farrimond</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr James</td>
<td>Eddleston</td>
<td>Mrs Valerie</td>
<td>Farrimond</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Andrew</td>
<td>Edwards</td>
<td>Mr Lawrance</td>
<td>Farrington</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Anthony</td>
<td>Edwards</td>
<td>Ms Sarah</td>
<td>Farrington</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Jacqueline</td>
<td>Edwards</td>
<td>Mr Ian</td>
<td>Farrow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Kenneth</td>
<td>Edwards</td>
<td>Mrs Kathleen</td>
<td>Farrow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Simon</td>
<td>Edwards</td>
<td>Mr Terence</td>
<td>Fawcett</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stuart</td>
<td>Edwards</td>
<td>Mrs Jean</td>
<td>Fay</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stuart</td>
<td>Edwards</td>
<td>Mrs Ada</td>
<td>Field</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Sybil May</td>
<td>Edwards</td>
<td>Mr John</td>
<td>Field</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Alex</td>
<td>Findley</td>
<td>Miss</td>
<td>Laura</td>
<td>Gardiner</td>
</tr>
<tr>
<td>-------</td>
<td>---------</td>
<td>---------</td>
<td>------</td>
<td>-------</td>
<td>----------</td>
</tr>
<tr>
<td>Mrs</td>
<td>Lesley</td>
<td>Findley</td>
<td>Mrs</td>
<td>Roma</td>
<td>Garner</td>
</tr>
<tr>
<td>Mr</td>
<td>Steve</td>
<td>Findley</td>
<td>Mr</td>
<td>Roy</td>
<td>Garner</td>
</tr>
<tr>
<td>Mrs</td>
<td>Linda</td>
<td>Finn</td>
<td>Mr</td>
<td>Neil</td>
<td>Garrick</td>
</tr>
<tr>
<td>Miss</td>
<td>Laura</td>
<td>Fish</td>
<td>Mrs</td>
<td>Renee</td>
<td>Carside</td>
</tr>
<tr>
<td>Mrs</td>
<td>Doris</td>
<td>Fisher</td>
<td>Mrs</td>
<td>Ennis</td>
<td>Gaskell</td>
</tr>
<tr>
<td>Mr</td>
<td>Nigel</td>
<td>Fisher</td>
<td>Mr</td>
<td>John</td>
<td>Gaskell</td>
</tr>
<tr>
<td>Mr</td>
<td>Robert</td>
<td>Fitzpatrick</td>
<td>Mrs</td>
<td>Kathryn</td>
<td>Gaskell</td>
</tr>
<tr>
<td>Mrs</td>
<td>Zena</td>
<td>Fitzpatrick</td>
<td>Mrs</td>
<td>Denise</td>
<td>Gauntlett</td>
</tr>
<tr>
<td>Mr</td>
<td>Stephen</td>
<td>Flanagan</td>
<td>Mrs</td>
<td>Susan</td>
<td>Gee</td>
</tr>
<tr>
<td>Mr</td>
<td>Harold</td>
<td>Flanigan-Taylor</td>
<td>Mr</td>
<td>Hilary</td>
<td>Gent</td>
</tr>
<tr>
<td>Barbara</td>
<td>Flatley</td>
<td></td>
<td>Mr</td>
<td>Peter</td>
<td>Gent</td>
</tr>
<tr>
<td>Dr</td>
<td>Janet</td>
<td>Flatley</td>
<td>Mr</td>
<td>Ian and Gaynor</td>
<td>Geraghty</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Flatley</td>
<td>Mr</td>
<td>Damien</td>
<td>Ghee</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Flatley</td>
<td>Mr</td>
<td>Phillip</td>
<td>Gibbons</td>
</tr>
<tr>
<td>Mr</td>
<td>Mark</td>
<td>Flatley</td>
<td>Mrs</td>
<td>Jacqueline</td>
<td>Gibson</td>
</tr>
<tr>
<td>Mr</td>
<td>Martin</td>
<td>Flatley</td>
<td>Mr</td>
<td>Anthony</td>
<td>Gilbert</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael</td>
<td>Flatley</td>
<td>Mrs</td>
<td>Frances</td>
<td>Gilbert</td>
</tr>
<tr>
<td>Mr</td>
<td>Paul</td>
<td>Flatley</td>
<td>Mr &amp;</td>
<td>John &amp; Norma</td>
<td>Gilchrist</td>
</tr>
<tr>
<td>Mr</td>
<td>Jack</td>
<td>Fletcher</td>
<td>Mrs</td>
<td>John &amp; Norma</td>
<td>Gilchrist</td>
</tr>
<tr>
<td>Mrs</td>
<td>Anne</td>
<td>Fletcher</td>
<td>Mr</td>
<td>David</td>
<td>Gillespie</td>
</tr>
<tr>
<td>Mr</td>
<td>Norman</td>
<td>Fletcher</td>
<td>Miss</td>
<td>Ann</td>
<td>Gittins</td>
</tr>
<tr>
<td>Mrs</td>
<td>Valerie</td>
<td>Fletcher</td>
<td>Mr</td>
<td>Thomas</td>
<td>Gittins</td>
</tr>
<tr>
<td>Mrs</td>
<td>Paul</td>
<td>Flint</td>
<td>Mrs</td>
<td>Jean Alexander</td>
<td>Glaze</td>
</tr>
<tr>
<td>Mr</td>
<td>Peter</td>
<td>Foley</td>
<td>Miss</td>
<td>Michaela</td>
<td>Glenn</td>
</tr>
<tr>
<td>Mrs</td>
<td>Elizabeth Anne</td>
<td>Forber</td>
<td>Mrs</td>
<td>Ethel</td>
<td>Glover</td>
</tr>
<tr>
<td>Mrs</td>
<td>Christine</td>
<td>Ford</td>
<td>Mrs</td>
<td>Jane</td>
<td>Glover</td>
</tr>
<tr>
<td>Mr and</td>
<td>Michael</td>
<td>Ford</td>
<td>Mr</td>
<td>Jeff</td>
<td>Glover</td>
</tr>
<tr>
<td>Mrs</td>
<td>Graeme and Ashi</td>
<td>Forrester</td>
<td>Mrs</td>
<td>Sarah</td>
<td>Glover</td>
</tr>
<tr>
<td>Mr</td>
<td>John Richard</td>
<td>Forshaw</td>
<td>Mr</td>
<td>Stephen</td>
<td>Glover</td>
</tr>
<tr>
<td>Mr</td>
<td>Peter</td>
<td>Forshaw</td>
<td>Mrs</td>
<td>Ethel Mary</td>
<td>Goldsack</td>
</tr>
<tr>
<td>Mr</td>
<td>Terence</td>
<td>Forshaw</td>
<td>Mrs</td>
<td>Helen</td>
<td>Gooden</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret</td>
<td>Forster</td>
<td>Mr</td>
<td>John</td>
<td>Gorman</td>
</tr>
<tr>
<td>Mrs</td>
<td>Andrea</td>
<td>Forsyth</td>
<td>Mrs</td>
<td>Beryl</td>
<td>Grady</td>
</tr>
<tr>
<td>Mrs</td>
<td>Muriel Joy</td>
<td>Fowler</td>
<td>Mrs</td>
<td>Helens</td>
<td>Graham</td>
</tr>
<tr>
<td>Miss</td>
<td>Emma</td>
<td>Fowlers</td>
<td>Mr</td>
<td>George</td>
<td>Grant</td>
</tr>
<tr>
<td>Mrs</td>
<td>Emma</td>
<td>Frame</td>
<td>Miss</td>
<td>Lindsey</td>
<td>Gray</td>
</tr>
<tr>
<td>Mrs</td>
<td>Jennifer</td>
<td>Frangleton</td>
<td>Mrs</td>
<td>Celia</td>
<td>Green</td>
</tr>
<tr>
<td>Mr</td>
<td>Keith</td>
<td>Frangleton</td>
<td>Mrs</td>
<td>Kathleen</td>
<td>Green</td>
</tr>
<tr>
<td>Mr</td>
<td>Ian</td>
<td>Franzen</td>
<td>Mrs</td>
<td>Margaret</td>
<td>Green</td>
</tr>
<tr>
<td>Mrs</td>
<td>Amanda</td>
<td>Freeman</td>
<td>Mrs</td>
<td>Mary A</td>
<td>Gregory</td>
</tr>
<tr>
<td>Mr</td>
<td>Gary</td>
<td>Freeman</td>
<td>Mr</td>
<td>Roy</td>
<td>Gregory</td>
</tr>
<tr>
<td>Mr</td>
<td>Brian</td>
<td>Furnival</td>
<td>Mr</td>
<td>Anthony Joseph</td>
<td>Griffin</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael</td>
<td>Ganly</td>
<td>Dr</td>
<td>Catherine</td>
<td>Griffith</td>
</tr>
<tr>
<td>Mrs</td>
<td>Marcella</td>
<td>Gannon</td>
<td>Mrs</td>
<td>Amanda</td>
<td>Griffiths</td>
</tr>
<tr>
<td>Mrs</td>
<td>Shelagh Margaret</td>
<td>Gannon</td>
<td>Mrs</td>
<td>Dena</td>
<td>Griffiths</td>
</tr>
<tr>
<td>Mr</td>
<td>Thomas Michael</td>
<td>Gannon</td>
<td>Mr</td>
<td>Karl</td>
<td>Griffiths</td>
</tr>
<tr>
<td>Mr</td>
<td>Thomas Walter</td>
<td>Gannon</td>
<td>Ms</td>
<td>Lesley</td>
<td>Griffiths</td>
</tr>
<tr>
<td>Mr</td>
<td>Barry</td>
<td>Gannon</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Surname</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Roy</td>
<td>Griffiths</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen</td>
<td>Grimshaw</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Patricia</td>
<td>Grundy</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David &amp; Barbara</td>
<td>Gudgin</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Gwatkins</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Christopher James</td>
<td>Hale</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Claire</td>
<td>Hale</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Enid</td>
<td>Hales</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr FE</td>
<td>Hales</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Paula</td>
<td>Hales</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Alan</td>
<td>Hall</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Pauline</td>
<td>Hall</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Robert James</td>
<td>Halliwell</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Ann</td>
<td>Hambleton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Ruth</td>
<td>Hamblett</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ms Karen</td>
<td>Hampson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Lisa</td>
<td>Hanson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Chris</td>
<td>Hardman</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Phillipa</td>
<td>Hargreaves</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Edward</td>
<td>Harper</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Nancy</td>
<td>Harper</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Robert</td>
<td>Harper</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Peter</td>
<td>Harper</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stuart Jonathan</td>
<td>Harris</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Beryl</td>
<td>Harrison</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>Harrison</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Francis</td>
<td>Harrison</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Roy</td>
<td>Harrison</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Sheila Mary</td>
<td>Harrison</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Doreen</td>
<td>Hartfield</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Michael</td>
<td>Hartley</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Richard</td>
<td>Hartley</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Colette</td>
<td>Harwood</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr James</td>
<td>Haslam</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Kathleen</td>
<td>Haslam</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Ronald and Patricia</td>
<td>Haslam</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Peter</td>
<td>Hatfield</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Barry</td>
<td>Hatton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Helen</td>
<td>Hatton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Joseph Eric</td>
<td>Hatton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Dorthe</td>
<td>Hausner-Cunliffe</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Jennifer</td>
<td>Hayes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Hayes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Peter</td>
<td>Hayes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Gorden and Vera</td>
<td>Haynes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Julia</td>
<td>Heath</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Paul</td>
<td>Heath</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Alan</td>
<td>Heath</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Carol</td>
<td>Heath</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Janet Ann</td>
<td>Heaton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Paul</td>
<td>Heaton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Paula</td>
<td>Heaton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Joyce</td>
<td>Hedges</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>Hemingway</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Gerard</td>
<td>Hendriksen</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dr Michelle</td>
<td>Hendriksen</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Patricia</td>
<td>Hendriksen</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr and</td>
<td>Hendry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Joyce</td>
<td>Heppenstall</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Roy</td>
<td>Heppenstall</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Barbara M</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Edwin</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Laura</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Michael</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Nicola</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr and</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Pat, Terry</td>
<td>Hewitt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Anthony John</td>
<td>Higgins</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Barry</td>
<td>Higginson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ms Charlotte</td>
<td>Higham</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>Higson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Eileen</td>
<td>Higson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Andrew</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Ann</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Christine</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Christine</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Doreen</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Keith</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Margaret</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Michael</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Pamela</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Peter</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Steve</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Wayne</td>
<td>Hill</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Janette</td>
<td>Hilton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr and</td>
<td>Hilton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Michelle</td>
<td>Hilton</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Emma</td>
<td>Hockson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Gillian</td>
<td>Hodges</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Terence</td>
<td>Hodges</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Gordon</td>
<td>Hodgson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Jeffrey</td>
<td>Hodkinson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Margaret</td>
<td>Hodkinson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dr Matthew</td>
<td>Hodkinson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Mary</td>
<td>Hodson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Richard</td>
<td>Hodson</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Mark</td>
<td>Miss</td>
<td>Samantha</td>
<td>Hogg</td>
<td>Mrs</td>
</tr>
<tr>
<td>-------</td>
<td>--------------</td>
<td>------</td>
<td>----------</td>
<td>---------------</td>
<td>------</td>
</tr>
<tr>
<td>Miss</td>
<td>Margaret</td>
<td>Mrs</td>
<td>Ali</td>
<td>Holdgate</td>
<td>Miss</td>
</tr>
<tr>
<td>Mr</td>
<td>Mark Joseph</td>
<td>Mrs</td>
<td>Susan</td>
<td>Holdsworth</td>
<td>Miss</td>
</tr>
<tr>
<td>Mr</td>
<td>John Barry</td>
<td>Mr</td>
<td>Darren</td>
<td>Holland</td>
<td>Mr</td>
</tr>
<tr>
<td>Mrs</td>
<td>Alison</td>
<td>Mrs</td>
<td>Susan</td>
<td>Holt</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Susan</td>
<td>Mr</td>
<td>Holgate</td>
<td>Holt</td>
<td>Mrs</td>
</tr>
<tr>
<td>Ms</td>
<td>Gail</td>
<td>Mrs</td>
<td>Marlene</td>
<td>Homer</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Debbie</td>
<td>Mrs</td>
<td>Nigel</td>
<td>Hondow</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Nigel</td>
<td>Mrs</td>
<td>Christina</td>
<td>Hooper</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Annie</td>
<td>Mr</td>
<td>Karl</td>
<td>Hopkins</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Aidan</td>
<td>Mr</td>
<td>Matthew</td>
<td>Hopkins</td>
<td>Mr</td>
</tr>
<tr>
<td>Mrs</td>
<td>Beryl</td>
<td>Mrs</td>
<td>Margaret</td>
<td>Hopton</td>
<td>Mr</td>
</tr>
<tr>
<td>Miss</td>
<td>Catherine</td>
<td>Mrs</td>
<td>Margaret</td>
<td>Hptonfield</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret</td>
<td>Mr</td>
<td>William</td>
<td>Horton</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Margaret</td>
<td>Dr</td>
<td>Valerie</td>
<td>Horton</td>
<td>Mrs</td>
</tr>
<tr>
<td>Dr</td>
<td>William</td>
<td>Mrs</td>
<td>Brenda</td>
<td>Horton</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eileen</td>
<td>Mrs</td>
<td>Valerie</td>
<td>Houghton</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Valerie</td>
<td>Mrs</td>
<td>Kathleen</td>
<td>Houghton</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Kathleen</td>
<td>Mr</td>
<td>William</td>
<td>Howland</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>William</td>
<td>Mr</td>
<td>Harold</td>
<td>Howarth</td>
<td>Mrs</td>
</tr>
<tr>
<td>Miss</td>
<td>Paula</td>
<td>Mr</td>
<td>Ronald</td>
<td>Howarth</td>
<td>Mr</td>
</tr>
<tr>
<td>Mr</td>
<td>Ronald</td>
<td>Mrs</td>
<td>Elaine</td>
<td>Howells</td>
<td>Mr</td>
</tr>
<tr>
<td>Mrs</td>
<td>Judith</td>
<td>Mr</td>
<td>Ian</td>
<td>Howells</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Marie</td>
<td>Mrs</td>
<td>Hudson</td>
<td>Howley</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Marie</td>
<td>Mr</td>
<td>Barry</td>
<td>Hugh</td>
<td>Mr</td>
</tr>
<tr>
<td>Mr</td>
<td>Adrian</td>
<td>Mr</td>
<td>Adrian</td>
<td>Hughes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Brian</td>
<td>Mr</td>
<td>Brian</td>
<td>Hughes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Mr</td>
<td>David</td>
<td>Hughes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Gerald</td>
<td>Mr</td>
<td>Gerald</td>
<td>Hughes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Mary Honora</td>
<td>Mr</td>
<td>Mary</td>
<td>Hughes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Miss</td>
<td>Julie</td>
<td>Mr</td>
<td>Michael</td>
<td>Hunt</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Abigail</td>
<td>Mr</td>
<td>Jean</td>
<td>Hurst</td>
<td>Mr</td>
</tr>
<tr>
<td>Mrs</td>
<td>Joanne</td>
<td>Mr</td>
<td>Joanne</td>
<td>Hurst</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael</td>
<td>Mr</td>
<td>Michael</td>
<td>Hurst</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Valerie</td>
<td>Mr</td>
<td>Michael</td>
<td>Hutchinson</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael</td>
<td>Mr</td>
<td>Geraint</td>
<td>Huxley</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Mrs</td>
<td>John</td>
<td>Ikin</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>Joanne</td>
<td>Mr</td>
<td>John</td>
<td>Janes</td>
<td>Mrs</td>
</tr>
<tr>
<td>Mrs</td>
<td>John</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Roger</td>
<td>Lewis</td>
<td>Mrs</td>
<td>Olive Sheila</td>
<td>Makin</td>
</tr>
<tr>
<td>------</td>
<td>------------------</td>
<td>--------------</td>
<td>------</td>
<td>-------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Mr</td>
<td>Alf</td>
<td>Linderman</td>
<td>Mrs</td>
<td>Karen</td>
<td>Makinson</td>
</tr>
<tr>
<td>Mrs</td>
<td>Nina</td>
<td>Linderman</td>
<td>Mr</td>
<td>Arthur Raymond</td>
<td>Makin</td>
</tr>
<tr>
<td>Mr</td>
<td>Nathan</td>
<td>Liptrot</td>
<td>Mrs</td>
<td>Patricia</td>
<td>Mallon</td>
</tr>
<tr>
<td>Mr</td>
<td>George</td>
<td>Lisle</td>
<td>Mrs</td>
<td>Claire</td>
<td>Maloney</td>
</tr>
<tr>
<td>Mrs</td>
<td>Lilian</td>
<td>Lisle</td>
<td>Mr</td>
<td>Derek Thomas</td>
<td>Maloney</td>
</tr>
<tr>
<td>Miss</td>
<td>Stephanie</td>
<td>Liston</td>
<td>Mrs</td>
<td>Gladys</td>
<td>Maloney</td>
</tr>
<tr>
<td>Mrs</td>
<td>Carol</td>
<td>Little</td>
<td>Mrs</td>
<td>June</td>
<td>Maloney</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Little</td>
<td>Mrs</td>
<td>Glenda</td>
<td>Maquire</td>
</tr>
<tr>
<td>Miss</td>
<td>Rene Mary</td>
<td>Littler</td>
<td>Mr</td>
<td>Howard</td>
<td>Mardsden</td>
</tr>
<tr>
<td>Mr</td>
<td>Allan</td>
<td>Livesey</td>
<td>Mrs</td>
<td>Dorothy</td>
<td>Markland</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Livesley</td>
<td>Mrs</td>
<td>Jessie</td>
<td>Marriott</td>
</tr>
<tr>
<td>Mr</td>
<td>Alan</td>
<td>Lloyd</td>
<td>Miss</td>
<td>Fiona</td>
<td>Marsden</td>
</tr>
<tr>
<td>Mr</td>
<td>G P</td>
<td>Lloyd</td>
<td>Mrs</td>
<td>Jayne</td>
<td>Marsden</td>
</tr>
<tr>
<td>Mr</td>
<td>Jack</td>
<td>Lloyd</td>
<td>Mrs</td>
<td>Amanda</td>
<td>Marsh</td>
</tr>
<tr>
<td>Mrs</td>
<td>Norma</td>
<td>Lloyd</td>
<td>Mr</td>
<td>Brian</td>
<td>Marsh</td>
</tr>
<tr>
<td>Mrs</td>
<td>Tina</td>
<td>Lloyd</td>
<td>Mr</td>
<td>David</td>
<td>Marsh</td>
</tr>
<tr>
<td>Mr and Mrs</td>
<td>Brian and Audrey</td>
<td>Lobell</td>
<td>Mrs</td>
<td>Johanna</td>
<td>Marsh</td>
</tr>
<tr>
<td>Mr</td>
<td>Andrew</td>
<td>Lockey</td>
<td>Mr</td>
<td>Jonathan</td>
<td>Marsh</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Lockyer</td>
<td>Miss</td>
<td>Lesley</td>
<td>Marshall</td>
</tr>
<tr>
<td>Ms</td>
<td>Sarah</td>
<td>Logan</td>
<td>Mrs</td>
<td>Christine</td>
<td>Martin</td>
</tr>
<tr>
<td>Mr and Mrs</td>
<td>James and Patricia</td>
<td>Logan and Waite</td>
<td>Mrs</td>
<td>Keith</td>
<td>Martin</td>
</tr>
<tr>
<td>Mr</td>
<td>Allan</td>
<td>Longmuir</td>
<td>Mrs</td>
<td>Anna Maria</td>
<td>Martlew</td>
</tr>
<tr>
<td>Mrs</td>
<td>Rita</td>
<td>Longmuir</td>
<td>Mr</td>
<td>John</td>
<td>Martlew</td>
</tr>
<tr>
<td>Mr</td>
<td>Brian</td>
<td>Lord</td>
<td>Mrs</td>
<td>Rachel</td>
<td>Mason</td>
</tr>
<tr>
<td>Mrs</td>
<td>Ann</td>
<td>Lowe</td>
<td>Mr</td>
<td>Sean</td>
<td>Mason</td>
</tr>
<tr>
<td>Mr</td>
<td>Colin</td>
<td>Lowe</td>
<td>Mr</td>
<td>Colin</td>
<td>Massey</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eric and Beryl</td>
<td>Lowe</td>
<td>Mrs</td>
<td>Patricia Ann</td>
<td>Massey</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret</td>
<td>Lowe</td>
<td>Mr</td>
<td>Paul</td>
<td>Massey</td>
</tr>
<tr>
<td>Mr</td>
<td>Christopher</td>
<td>Lowsley</td>
<td>Mrs</td>
<td>Paula</td>
<td>Massey</td>
</tr>
<tr>
<td>Mrs</td>
<td>Jean</td>
<td>Lyon</td>
<td>Miss</td>
<td>Hayley</td>
<td>Mather</td>
</tr>
<tr>
<td>Ms</td>
<td>Sonia Maria</td>
<td>Lyon</td>
<td>Mrs</td>
<td>Louise</td>
<td>Matlock</td>
</tr>
<tr>
<td>Mr</td>
<td>Stewart</td>
<td>Lyon</td>
<td>Mr</td>
<td>Christopher</td>
<td>Matthews</td>
</tr>
<tr>
<td>Mrs</td>
<td>Sylvia</td>
<td>Lythgoe</td>
<td>Mr</td>
<td>Edward</td>
<td>Matthews</td>
</tr>
<tr>
<td>Mrs</td>
<td>Valerie</td>
<td>Lythgoe</td>
<td>Mrs</td>
<td>Constance</td>
<td>Mawdesley</td>
</tr>
<tr>
<td>Mrs</td>
<td>Scott</td>
<td>Mabel</td>
<td>Mrs</td>
<td>Sharon</td>
<td>Maxwell</td>
</tr>
<tr>
<td>Mr</td>
<td>Ross</td>
<td>MacMahon</td>
<td>Mrs</td>
<td>Margaret and David</td>
<td>Mayers</td>
</tr>
<tr>
<td>Miss</td>
<td>Joanne</td>
<td>Magee</td>
<td>Mr</td>
<td>Kenneth</td>
<td>Mc Dougall</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eileen</td>
<td>Mahon</td>
<td>Miss</td>
<td>Caroline</td>
<td>McClymont</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Mahon</td>
<td>Mrs</td>
<td>Alaina</td>
<td>Mc Dade</td>
</tr>
<tr>
<td>Mr</td>
<td>Keith</td>
<td>Mahon</td>
<td>Mr</td>
<td>Graeme</td>
<td>McDonald</td>
</tr>
<tr>
<td>Mrs</td>
<td>Linda</td>
<td>Mahon</td>
<td>Mrs</td>
<td>Jacqueline</td>
<td>McDonough</td>
</tr>
<tr>
<td>Miss</td>
<td>Lynn</td>
<td>Mahon</td>
<td>Mr</td>
<td>Joe</td>
<td>McDonough</td>
</tr>
<tr>
<td>Mrs</td>
<td>Pauline</td>
<td>Mahon</td>
<td>Ms</td>
<td>Patricia</td>
<td>McDonough</td>
</tr>
<tr>
<td>Mr</td>
<td>Ronald</td>
<td>Mahon</td>
<td>Mr</td>
<td>Paddy</td>
<td>Mc Eilchare</td>
</tr>
<tr>
<td>Mr</td>
<td>William</td>
<td>Mahon</td>
<td>Mrs</td>
<td>Stella</td>
<td>Mc Geachin</td>
</tr>
<tr>
<td>Mrs</td>
<td>Marian</td>
<td>Maines</td>
<td>Mr</td>
<td>Kevin</td>
<td>McGinley</td>
</tr>
<tr>
<td>Mr</td>
<td>Dave</td>
<td>Maisey</td>
<td>Mrs</td>
<td>Susan</td>
<td>McGinley</td>
</tr>
<tr>
<td>Mrs</td>
<td>Wendy</td>
<td>Maisey</td>
<td>Dr</td>
<td>Robert</td>
<td>McLaughlan</td>
</tr>
<tr>
<td>Name</td>
<td>Surname</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr David</td>
<td>McVeigh</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Jane</td>
<td>McVeigh</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Wayne</td>
<td>Meaden</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Valerie Joan</td>
<td>Meall</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Paul</td>
<td>Meikle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Chris</td>
<td>Meila</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Elizabeth</td>
<td>Melia</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Kim</td>
<td>Melia</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Moyra</td>
<td>Melia</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr George</td>
<td>Melvin</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Lois</td>
<td>Melvin</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Patrick</td>
<td>Menzies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Pauline</td>
<td>Menzies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Helen</td>
<td>Mercer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Karl</td>
<td>Mercer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Michael John</td>
<td>Mercer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Patricia Ann</td>
<td>Mercer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Richard</td>
<td>Mercer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Christine</td>
<td>Metheringham</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Ron</td>
<td>Metherington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Badsha</td>
<td>Miah</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fazlu</td>
<td>Miah</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Mohammed</td>
<td>Miah</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Anthony</td>
<td>Miller</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Alan</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Holly</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Margaret</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Pauline</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Valerie</td>
<td>Millington</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr &amp; Mrs John and Susan</td>
<td>Mills</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Laura</td>
<td>Mills</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stuart</td>
<td>Mitchell</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stuart</td>
<td>Mitchell</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Anita</td>
<td>Molyneux</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Gary</td>
<td>Molyneux</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John</td>
<td>Molyneux</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen</td>
<td>Monks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Donald</td>
<td>Montgomery</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Trevor</td>
<td>Moon</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miss Jo</td>
<td>Moorcroft</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Beryl</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Ian</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs J</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Jennifer</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Joseph C</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr K</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Nathan</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen</td>
<td>Moore</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 192 of 248
<table>
<thead>
<tr>
<th>Name</th>
<th>Surname</th>
<th>Name</th>
<th>Surname</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr</td>
<td>Roy</td>
<td>Mr</td>
<td>Craig</td>
</tr>
<tr>
<td>Mr</td>
<td>John</td>
<td>Mr</td>
<td>Gary</td>
</tr>
<tr>
<td>Mr</td>
<td>Raymond</td>
<td>Mrs</td>
<td>Gillian</td>
</tr>
<tr>
<td>Mr</td>
<td>David</td>
<td>Mrs</td>
<td>Ann</td>
</tr>
<tr>
<td>Mrs</td>
<td>Ruth</td>
<td>Mr</td>
<td>G Hugh</td>
</tr>
<tr>
<td>Mr</td>
<td>Benedict</td>
<td>Ms</td>
<td>Julie</td>
</tr>
<tr>
<td>Mrs</td>
<td>Christine</td>
<td>Mrs</td>
<td>Margaret</td>
</tr>
<tr>
<td>Mr</td>
<td>Wilfred</td>
<td>Mr</td>
<td>David</td>
</tr>
<tr>
<td>Mr</td>
<td>Nigel</td>
<td>Mrs</td>
<td>Audrey</td>
</tr>
<tr>
<td>Mr</td>
<td>Jim</td>
<td>Mr</td>
<td>Kevin</td>
</tr>
<tr>
<td>Mrs</td>
<td>Naomi</td>
<td>Mrs</td>
<td>Lorraine</td>
</tr>
<tr>
<td>Mrs</td>
<td>Philippa</td>
<td>Mr</td>
<td>Roy</td>
</tr>
<tr>
<td>Mr</td>
<td>Nick</td>
<td>Mrs</td>
<td>Mabel</td>
</tr>
<tr>
<td>Mrs</td>
<td>Josephine</td>
<td>Mrs</td>
<td>Alice</td>
</tr>
<tr>
<td>Mr</td>
<td>Andrew</td>
<td>Mrs</td>
<td>Maureen</td>
</tr>
<tr>
<td>Mrs</td>
<td>Susan</td>
<td>Mrs</td>
<td>Beverley</td>
</tr>
<tr>
<td>Miss</td>
<td>Marjorie</td>
<td>Miss</td>
<td>Banton</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eileen</td>
<td>Mrs</td>
<td>Edith</td>
</tr>
<tr>
<td>Miss</td>
<td>Ethel</td>
<td>Mr</td>
<td>James Stanley</td>
</tr>
<tr>
<td>Mr</td>
<td>Paul</td>
<td>Mrs</td>
<td>Winifred</td>
</tr>
<tr>
<td>Mrs</td>
<td>Teresa</td>
<td>Mr</td>
<td>Micheal</td>
</tr>
<tr>
<td>Mr</td>
<td>Alan</td>
<td>Mrs</td>
<td>Suzanne</td>
</tr>
<tr>
<td>Mr</td>
<td>Bryan</td>
<td>Ms</td>
<td>Elaine</td>
</tr>
<tr>
<td>Miss</td>
<td>Christina</td>
<td>Mr and</td>
<td>Brian and Barbara</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eileen</td>
<td>Mr</td>
<td>Christopher</td>
</tr>
<tr>
<td>Mrs</td>
<td>Eileen</td>
<td>Mr</td>
<td>Colin</td>
</tr>
<tr>
<td>Mr</td>
<td>George</td>
<td>Mrs</td>
<td>Elaine</td>
</tr>
<tr>
<td>Mrs</td>
<td>Joan</td>
<td>Mrs</td>
<td>Freya</td>
</tr>
<tr>
<td>Mr</td>
<td>Leslie</td>
<td>Mrs</td>
<td>Gemma</td>
</tr>
<tr>
<td>Mrs</td>
<td>Mary Elizabeth</td>
<td>Mr</td>
<td>Gordon</td>
</tr>
<tr>
<td>Mr</td>
<td>Norman</td>
<td>Mrs</td>
<td>Hazel Margaret</td>
</tr>
<tr>
<td>Mr</td>
<td>Raymond</td>
<td>Ms</td>
<td>Jacqueline Mary</td>
</tr>
<tr>
<td>Mrs</td>
<td>Tracy</td>
<td>Mr</td>
<td>Malcolm</td>
</tr>
<tr>
<td>Mrs</td>
<td>Vanessa</td>
<td>Mr</td>
<td>Michael</td>
</tr>
<tr>
<td>Mr</td>
<td>Neville</td>
<td>Mr</td>
<td>Nigel</td>
</tr>
<tr>
<td>Mrs</td>
<td>Freda</td>
<td>Mrs</td>
<td>Pamela</td>
</tr>
<tr>
<td>Ms</td>
<td>Susan</td>
<td>Mrs</td>
<td>Patricia</td>
</tr>
<tr>
<td>Dr</td>
<td>Anne</td>
<td>Mr</td>
<td>Paul</td>
</tr>
<tr>
<td>Rev.</td>
<td></td>
<td>Mr</td>
<td>Paul M</td>
</tr>
<tr>
<td>Dr.</td>
<td>Chris</td>
<td>Mr</td>
<td>Robert Richmond</td>
</tr>
<tr>
<td>Dr.</td>
<td>Eve</td>
<td>Mr</td>
<td>Sydney</td>
</tr>
<tr>
<td>Mr</td>
<td>Maurice M</td>
<td>Mrs</td>
<td>Sylvia</td>
</tr>
<tr>
<td>Mr &amp;</td>
<td></td>
<td>Mr</td>
<td>William John</td>
</tr>
<tr>
<td>Mrs</td>
<td>R &amp; S</td>
<td>Mr</td>
<td>Ann</td>
</tr>
<tr>
<td>Mrs</td>
<td>Cathy</td>
<td>Mr</td>
<td>Ian</td>
</tr>
<tr>
<td>Mr</td>
<td>Matthew</td>
<td>Mr</td>
<td>Gary</td>
</tr>
<tr>
<td>Miss</td>
<td>Rachel</td>
<td>Mr</td>
<td>Gordon</td>
</tr>
<tr>
<td>Miss</td>
<td>Charlotte</td>
<td>Mrs</td>
<td>Patricia</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mrs</td>
<td>Clare</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mr</td>
<td>Peter</td>
</tr>
</tbody>
</table>

Please note that the names are listed in a standard format, with the last name followed by a comma and optionally a space and a title or relationship. Each name is separated by a comma. The document appears to be a list of names and titles, possibly from a directory or a similar context.
<table>
<thead>
<tr>
<th>Full Name</th>
<th>Nickname</th>
<th>Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mrs Sue Thomas</td>
<td></td>
<td>Thomas</td>
</tr>
<tr>
<td>Mrs Samantha Thomas-Berry</td>
<td></td>
<td>Thomas-Berry</td>
</tr>
<tr>
<td>Mr Stephen Thomas-Berry</td>
<td></td>
<td>Thomas-Berry</td>
</tr>
<tr>
<td>Mrs Debra Thompson</td>
<td></td>
<td>Thompson</td>
</tr>
<tr>
<td>Mr James Tickle</td>
<td></td>
<td>Tickle</td>
</tr>
<tr>
<td>Mrs Lynn Tickle</td>
<td></td>
<td>Tickle</td>
</tr>
<tr>
<td>Mr Rodney Mark Tickle</td>
<td></td>
<td>Tickle</td>
</tr>
<tr>
<td>Mr John Tickle</td>
<td></td>
<td>Tickle</td>
</tr>
<tr>
<td>Mr Christian Traverse</td>
<td></td>
<td>Traverse</td>
</tr>
<tr>
<td>Mrs Joan Travis</td>
<td></td>
<td>Travis</td>
</tr>
<tr>
<td>Mr and Mrs Matthew and Jennifer Traynor</td>
<td></td>
<td>Traynor</td>
</tr>
<tr>
<td>Mr Andrew James Trickett</td>
<td></td>
<td>Trickett</td>
</tr>
<tr>
<td>Mr Robert Trickett</td>
<td></td>
<td>Trickett</td>
</tr>
<tr>
<td>Mrs Gillian Tricrett</td>
<td></td>
<td>Tricrett</td>
</tr>
<tr>
<td>Mrs Julie Ruth Trumble</td>
<td></td>
<td>Trumble</td>
</tr>
<tr>
<td>Mr James Gerard Tully</td>
<td></td>
<td>Tully</td>
</tr>
<tr>
<td>Mr Michael Tully</td>
<td></td>
<td>Tully</td>
</tr>
<tr>
<td>Mrs Rita Turner</td>
<td></td>
<td>Turner</td>
</tr>
<tr>
<td>Mr Christine Turton</td>
<td></td>
<td>Turton</td>
</tr>
<tr>
<td>Mrs Brenda Twamley</td>
<td></td>
<td>Twamley</td>
</tr>
<tr>
<td>Mr lan Twemlow</td>
<td></td>
<td>Twemlow</td>
</tr>
<tr>
<td>Mr Ben Tyas</td>
<td></td>
<td>Tyas</td>
</tr>
<tr>
<td>Mrs Catherine Tyas</td>
<td></td>
<td>Tyas</td>
</tr>
<tr>
<td>Mr Daniel Tyas</td>
<td></td>
<td>Tyas</td>
</tr>
<tr>
<td>Mr Dave Tyas</td>
<td></td>
<td>Tyas</td>
</tr>
<tr>
<td>Mrs Barbara Unsworth Gillian</td>
<td>Unsworth</td>
<td>Unsworth</td>
</tr>
<tr>
<td>Mr Jeffrey Unsworth</td>
<td></td>
<td>Unsworth</td>
</tr>
<tr>
<td>Mrs Lynn Unsworth</td>
<td></td>
<td>Unsworth</td>
</tr>
<tr>
<td>Mr Kevin Urmston</td>
<td></td>
<td>Urmston</td>
</tr>
<tr>
<td>Mr Keith Valentine</td>
<td></td>
<td>Valentine</td>
</tr>
<tr>
<td>Mrs Marion Vernon</td>
<td></td>
<td>Vernon</td>
</tr>
<tr>
<td>Mr Richard Vernon</td>
<td></td>
<td>Vernon</td>
</tr>
<tr>
<td>Mr Banks Vincent</td>
<td></td>
<td>Vincent</td>
</tr>
<tr>
<td>Miss Catherine Vowles</td>
<td></td>
<td>Vowies</td>
</tr>
<tr>
<td>Miss Stephanie Vowles</td>
<td></td>
<td>Vowies</td>
</tr>
<tr>
<td>Mr Linda Vowles</td>
<td></td>
<td>Vowles</td>
</tr>
<tr>
<td>Miss Rebecca Vowles</td>
<td></td>
<td>Vowles</td>
</tr>
<tr>
<td>Mrs Ann Waddington</td>
<td></td>
<td>Waddington</td>
</tr>
<tr>
<td>Mr Colin Waggett</td>
<td></td>
<td>Waggett</td>
</tr>
<tr>
<td>Mr Clifford Waine</td>
<td></td>
<td>Waine</td>
</tr>
<tr>
<td>Mrs Beverley Walkden</td>
<td></td>
<td>Walkden</td>
</tr>
<tr>
<td>Mrs Christine Walkden</td>
<td></td>
<td>Walkden</td>
</tr>
<tr>
<td>Mr Derek Walkden</td>
<td></td>
<td>Walkden</td>
</tr>
<tr>
<td>Mr Leslie Walkden</td>
<td></td>
<td>Walkden</td>
</tr>
<tr>
<td>Mrs Olive Walkden</td>
<td></td>
<td>Walkden</td>
</tr>
<tr>
<td>Ms Geraldine Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mr Iain Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mrs June Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mrs Kathleen Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mrs Margaret Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mr Paul Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mr William Walker</td>
<td></td>
<td>Walker</td>
</tr>
<tr>
<td>Mr B J Walsh</td>
<td></td>
<td>Walsh</td>
</tr>
<tr>
<td>Mrs Collette Walsh</td>
<td></td>
<td>Walsh</td>
</tr>
<tr>
<td>Mr Frank Walsh</td>
<td></td>
<td>Walsh</td>
</tr>
<tr>
<td>Mrs Johanne Walsh</td>
<td></td>
<td>Walsh</td>
</tr>
<tr>
<td>Mr Paul Walsh</td>
<td></td>
<td>Walsh</td>
</tr>
<tr>
<td>Mr Peter Walters</td>
<td></td>
<td>Walters</td>
</tr>
<tr>
<td>Mrs Maria Ward</td>
<td></td>
<td>Ward</td>
</tr>
<tr>
<td>Miss Rachel Ward</td>
<td></td>
<td>Ward</td>
</tr>
<tr>
<td>Mrs Valerie Watts</td>
<td></td>
<td>Watts</td>
</tr>
<tr>
<td>Mr Charles Waywell</td>
<td></td>
<td>Waywell</td>
</tr>
<tr>
<td>Mrs Eileen Weatherilt</td>
<td></td>
<td>Weatherilt</td>
</tr>
<tr>
<td>Mr Roy Weatherilt</td>
<td></td>
<td>Weatherilt</td>
</tr>
<tr>
<td>Mr Peter Graham Webb</td>
<td></td>
<td>Webb</td>
</tr>
<tr>
<td>Mrs Margaret Webster</td>
<td></td>
<td>Webster</td>
</tr>
<tr>
<td>Mrs Gillian Welsby</td>
<td></td>
<td>Welsby</td>
</tr>
<tr>
<td>Mr Jeff Welsby</td>
<td></td>
<td>Welsby</td>
</tr>
<tr>
<td>Mrs Doreen Welsh</td>
<td></td>
<td>Welsh</td>
</tr>
<tr>
<td>Mr Ian Welsh</td>
<td></td>
<td>Welsh</td>
</tr>
<tr>
<td>Mrs Jennifer Welsh</td>
<td></td>
<td>Welsh</td>
</tr>
<tr>
<td>Mr Robert Welsh</td>
<td></td>
<td>Welsh</td>
</tr>
<tr>
<td>Mr Ken West</td>
<td></td>
<td>West</td>
</tr>
<tr>
<td>Mr David Westmorland</td>
<td></td>
<td>Westmorland</td>
</tr>
<tr>
<td>Mr John Wheeler</td>
<td></td>
<td>Wheeler</td>
</tr>
<tr>
<td>Mrs Lois Wheeler</td>
<td></td>
<td>Wheeler</td>
</tr>
<tr>
<td>Mr James Whelan</td>
<td></td>
<td>Whelan</td>
</tr>
<tr>
<td>Mr Andrew White</td>
<td></td>
<td>White</td>
</tr>
<tr>
<td>Mrs Lesley White</td>
<td></td>
<td>White</td>
</tr>
<tr>
<td>Mr Paul White</td>
<td></td>
<td>White</td>
</tr>
<tr>
<td>Mr Anthony Whitehead</td>
<td></td>
<td>Whitehead</td>
</tr>
<tr>
<td>Mrs Tracy Whiford</td>
<td></td>
<td>Whiford</td>
</tr>
<tr>
<td>Mrs Brenda Phylis Whittaker</td>
<td>Phylis</td>
<td>Whittaker</td>
</tr>
<tr>
<td>Mr Andrew Whittle</td>
<td></td>
<td>Whittle</td>
</tr>
<tr>
<td>Mrs Ann Gladys Whittle</td>
<td></td>
<td>Whittle</td>
</tr>
<tr>
<td>Mr Jonathan Whittle</td>
<td></td>
<td>Whittle</td>
</tr>
<tr>
<td>Mrs Julie Whittle</td>
<td></td>
<td>Whittle</td>
</tr>
<tr>
<td>Mr Hugh Whyman</td>
<td></td>
<td>Whyman</td>
</tr>
<tr>
<td>Mrs Linda Whymans</td>
<td></td>
<td>Whymans</td>
</tr>
<tr>
<td>Mrs Edith Wight</td>
<td></td>
<td>Wight</td>
</tr>
<tr>
<td>Mr Ronald Wight</td>
<td></td>
<td>Wight</td>
</tr>
<tr>
<td>Mrs Beryl Wilcock</td>
<td></td>
<td>Wilcock</td>
</tr>
<tr>
<td>Mr John Alban Wilcock</td>
<td></td>
<td>Wilcock</td>
</tr>
<tr>
<td>Miss Lisa Wilcock</td>
<td></td>
<td>Wilcock</td>
</tr>
<tr>
<td>Mrs</td>
<td>Marion Wilde</td>
<td>Miss Carol Woodward</td>
</tr>
<tr>
<td>------</td>
<td>--------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Mr</td>
<td>Darren Wilding</td>
<td>Mrs Elissa Woodward</td>
</tr>
<tr>
<td>Mrs</td>
<td>Debra Wilkinson</td>
<td>Mr George Woodward</td>
</tr>
<tr>
<td>Mr</td>
<td>Roger Wilkinson</td>
<td>Miss Lindsay Woodward</td>
</tr>
<tr>
<td>Mrs</td>
<td>Shelagh Wilkinson</td>
<td>Mr Michael Worrall</td>
</tr>
<tr>
<td>Mr</td>
<td>Stephen Wilkinson</td>
<td>Mr Robert Worsley</td>
</tr>
<tr>
<td>Ms</td>
<td>Emma Wilks</td>
<td>Mrs Margaret Wray</td>
</tr>
<tr>
<td>Mr</td>
<td>Lester Williams</td>
<td>Mrs Joyce Wright</td>
</tr>
<tr>
<td>Mrs</td>
<td>Aaron Williams</td>
<td>Mrs Anne Wynne</td>
</tr>
<tr>
<td>Mrs</td>
<td>Anne Williams</td>
<td>Dr Ian Wynne</td>
</tr>
<tr>
<td>Mr</td>
<td>Brian Williams</td>
<td>Mrs Karen Yates</td>
</tr>
<tr>
<td>Mr</td>
<td>Graham Williams</td>
<td>Mr Norman Yates</td>
</tr>
<tr>
<td>Mr</td>
<td>Graham Williams</td>
<td>Mr Paul Yates</td>
</tr>
<tr>
<td>Mrs</td>
<td>Jennifer Williams</td>
<td>Mrs Alma Young</td>
</tr>
<tr>
<td>Mr</td>
<td>John Williams</td>
<td>Miss Amanda Young</td>
</tr>
<tr>
<td>Miss</td>
<td>Katherine Williams</td>
<td>Mr Lesley Young</td>
</tr>
<tr>
<td>Mrs</td>
<td>Margaret Edith Williams</td>
<td>Mrs Maureen Young</td>
</tr>
<tr>
<td>Mrs</td>
<td>Sarah Elizabeth Williams</td>
<td>Mr Vincent Young</td>
</tr>
<tr>
<td>Mrs</td>
<td>Diane Wilshaw</td>
<td>Mr Ian Zorn</td>
</tr>
<tr>
<td>Mr</td>
<td>Michael Wilshaw</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Deborah Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Geoffrey Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Gordon Wilson</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>J Lesley Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Jeffrey Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>John Wilson</td>
<td></td>
</tr>
<tr>
<td>Miss</td>
<td>Katherine Wilson</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Linda Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Neil Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Belshaw Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Ray Wilson</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Rita Wilson</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Geoffrey and Claire Winter</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Jaime Winter</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Karen Winterbottom</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Aileen Wiswell</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Dennis Witter</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Alan Neil Wood</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Isabelle Wood</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Robert and Elizabeth Wood</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Robert Wood</td>
<td></td>
</tr>
<tr>
<td>Ms</td>
<td>Andrea Woodall</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Andrew Woodall</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Sarah Woodall</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Anita Woodcock</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>William Woodcock</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>David Woodhouse</td>
<td></td>
</tr>
<tr>
<td>Mrs</td>
<td>Gill Woods</td>
<td></td>
</tr>
<tr>
<td>Mr</td>
<td>Jake Woods</td>
<td></td>
</tr>
</tbody>
</table>
**Appendix 2 – list of additional comments supplementing cyclostyled responses**

The following comments were additional comments made on the cyclo-styled Parkside Action Group representation forms. The comments have been considered and responses are set out below:

<table>
<thead>
<tr>
<th>Received From</th>
<th>Additional comments made</th>
<th>Council Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mrs Dianne Aaronson</td>
<td>The existing traffic is already at its maximum.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mr Geoffrey Abey</td>
<td>We do not want this development to proceed, keep the greenbelt. There will be too much congestion on the roads around Newton.</td>
<td>The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mrs Dorothy Abey</td>
<td>I feel that Newton people should have a say in what happens to their community. The size of this development is far too large and dwarfs Newton making it into an industrial site. The traffic would be increased considerably.</td>
<td>Issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Richard Ablett</td>
<td>The parcel of land in question is part of a larger area Issue is covered in detail in the greenbelt and is therefore, unsuitable for industrial development.</td>
<td>Draft policy requires all development on site to be rail connected.</td>
</tr>
<tr>
<td>Mr Wilfred Addison</td>
<td>Unless the transfer is rail/road there is no benefit to the global environment and there is a distinct loss of amenity locally. This is not green!</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Arthur Alderson</td>
<td>I thought St Helens MBC were supposed to represent the people of St Helens not Prologics.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mr Steve Allen</td>
<td>Just not appropriate.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mrs Valerie Allen</td>
<td>Totally unsound does not reflect public opinion in the area. Totally inappropriate use of greenbelt.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Glyn Andrew</td>
<td>There are brown belt site available. Keep greenbelt green. Most important, protect the pit head for future generations, coal might be required in the future.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mrs Ivy Appleton</td>
<td>No matter how many objections to plans we make, if the applicants have money they will win.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mrs Ashcroft Winifred</td>
<td>I have lived happily all my life (90 years: born in 1918) in Newton le Willows and I do not want to see the place spoiled for future generations.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mr and Mrs Clare Ashton</td>
<td>I would welcome comments from the Director of Public Health re. this submission. A Health Impact Assessment should be considered.</td>
<td>Any proposal would need to be supported by an Environmental Impact Assessment at planning application stage.</td>
</tr>
</tbody>
</table>
Mr Jonathan Ashworth  It is a vital area of Green Belt, ensuring that the towns of St Helens, Warrington and Wigan have green areas between them rather than a single urban sprawl from Liverpool to Manchester.

The Green Belt issue is covered in detail in the original submission and response.

Mr Brian Astles  This proposal to take Parkside site from the Green Belt status and build a large freight site there will be a complete nightmare for the whole area.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Barbara Astles  This proposal to take Parkside from the Green Belt status and build a rail freight terminal will be a complete nightmare for Newton which is already being decimated by STHMBC. We feel like second-class citizens under St Helens Council.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Helen Baker  We don't need Parkside! We don't need another retail park (they just kill town centre e.g. Leigh) Stop being greedy, start being honest and consider the impact please!

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Marina Baker  Concerned about extra traffic and expense of upkeep of roads, etc. How dare you purloin Green Belt land that belongs to the people, not you alone, for something that doesn't benefit the majority? Greedy St Helens Council!

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Robert Neill Ball  This LDF Core Strategy is completely anti-community in the extreme. The impact on the towns of Newton-le-Willows and Golborne and Lowton and the village of Winwick will be so negative in terms of congestion, pollution (air quality, noise and light) that it defies definition. The problems created will not be capable of resolution if this is allowed to proceed.

Issue is covered in detail in the original submission and response.

Mrs Irene Banks  Against Green Belt being taken away. Also extra traffic on A49 through Winwick will make travelling impossible when M6 is held up.

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Angela Mary Barrett  If Butterflies and Bees are indeed indicators of environmental well-being our countryside will have a lot less of natural flora & fauna to leave for future generations if this scheme goes ahead. There are numerous areas which you could utilise without taking the prime green belt / brownfield site that is the whole area of Parkside urbanisation must go on at what cost, we the general public do not appear to have a voice when we do we are cried down, and are told this will bring work, jobs etc with no thought that when this proposed site for freight runs its course and elsewhere in the country appears lucrative - it will be left derelict with no plans in place to revitalise the plundered area. It should not be allowed - Conversely it will be a prime area for house building again unfortunately swallow up farm land and therefore loose forever - like the seas, when all the fish have been caught and the trees all chopped down. Our once delicately balance ecosystem God given will have been destroyed - for one thing - Money and consumerism. The toxicity and pollution from all the freight generated by this project is too frightening to think about. All for the

Concern is noted, however this is not an issue that can be considered in the planning process.
wheels of industry - We don't want it. No wonder future generations don't know where things they eat
are grown and farmed!! They are being xxxx why big buck bullies use the millions to refurbish already
depreciating eyesores in the country.

Mr Beattie Grahame
Road transport problems already exist in this area
and a development of the size planned will only add
to the problem.

Mrs Linda Beattie
Road traffic problems already exist in this area and
development of the size which is planned will only
add to the problem.

Mr Alex Beddard
Newton will no longer be a town, it will be turned into
one giant industrial estate. No thought or regard
given to the people who actually live here. Pollution,
traffic and amount of transport on the roads will all
be out of control.

Mr Ronald Beddard
The plans for Parkside are based purely on financial
greed for developers and the council revenue. No
thought of the future for residents and the health of
thousands of people living near the industrial
development including incinerators & toxic fumes
from hundreds of vehicles.

Mrs Kay Beddard
Green Belt boundaries should be kept as green belt
and not changed to suit greedy developers and un-
caring councillors. Please listen to the voice of local
people.

Mr Graham Bellamy
A disgraceful use of Green Belt - the council should
be ashamed.

Mrs Susan Bennison
As usual you are not listening to the people who put
you in power. No to brown belt.

Mr Raymond Bent
To release green belt land purely to enable an
applicants planning formality is a disgrace. There
are other sites being developed in the Northwest
much nearer to the larger active conurbations in the
northwest in Liverpool and Manchester.

Mrs Mavis Bent
We have hardly any greenbelt left in Newton Le
Willows. The Council is willing to destroy even that

Mr James Bentham Raymond
The project is on such a massive scale that it could
only change the present characteristic of a small
town.

Mrs Elizabeth Bentham
A wonderful area for playing fields, for the youth of
our small town.

Mr Derek Beswick
It is time that St Helens stopped the continued
destruction of N-L-W. The quality of the town is
being eroded from the merging of two schools which
nobody wants, to Parkside. Earlestown is like
something from the third world, run down, a
complete disgrace.

Mrs Judith Beveridge
The existing green belt must be protected to ensure
a buffer remains between developments and urban
growth. We need to protect the lungs of the
countryside.

The Green Belt issue is covered in
detail in the original submission and
response.
Although local councils sometimes need to override the wishes of some of their constituents "for the greater good", the planning application submitted by Astral Developments will bring nothing but harm to all the residents of the various boroughs surrounding the proposed development. At a time when populations and concomitant pollution levels are increasing, the imperative of retaining as much green space as possible should be at the very top of a list of every council's duties. I should be very sorry indeed to learn that St. Helens Council had failed in this duty.

Concern is noted, however this is not an issue that can be considered in the planning process.

The scheme is in line with the Gov't's aim to transfer freight from road to rail to reduce CO2 emissions.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

Newton High Street and the M6 corridor are indented in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Mr Peter Boyce: There is already too much traffic in Newton and not enough "green" space.

Mr Martin Boydell: I consider it to be of the utmost importance that our Green Belts are retained for all our benefit.

Mrs Irene Boydell: I do not feel that a decision as far reaching as the removal of the Green Belt should be left to the Local Authority because elected members do not have sufficient knowledge to make such a decision, especially as the area concerned borders two other authority areas.

Mr Graham Boyes: This development will totally change the character of the area to the great detriment of local residents. We have no wish to have this huge development disrupting life 24 hours a day in the area, bringing more traffic onto overcrowded roads and destroying greenbelt when there must exist suitable brown sites to accommodate the scheme if truly necessary.

Mr Ronald Brandwood: I strongly oppose any plan, which will harm the green belt.

Mrs Sylvia Brandwood: Obviously St Helens are not aware of the fact that the green belt, apart from protecting us from urban sprawl, also assists in soaking up noxious fumes and strongly oppose any plan which will harm the green belt and bury the land under tarmac and swamp local areas with yet more traffic, pollution and noise. Time to become more responsible St Helens and protect our environment.

Mr Robert Brennan: St. Helens will not be affected by the vast amount of pollution that the new site would generate in an area already badly polluted.

Mrs Olive Brennan: Save our Green Belt we haven’t got much left. No to Parkside.

Mr Jon Brennon: I live just opposite font of site. Road in front of our house already noisy in night - let alone the levels we can expect from freight! No green areas available for people local to site - I am sure there will be no jobs for locals.

Mr Marc Brennon: My children go to visit their grandmother directly opposite the proposed site. The traffic is already noisy, dirty on the A49 and more traffic would put my children at risk. Besides that there is nowhere nearby to just push a prim or play areas for children - the site would best be used for local people as a park - not giving jobs to people outside the area - as this would happen - most people commute to work

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

The Green Belt issue is covered in detail in the original submission and response.

Concern is noted, however this is not an issue that can be considered in the planning process.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

Newton High Street and the M6 corridor are indentifed in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Mr and Mrs Joseph and Alma Brierley  | What about the birds and other wildlife that will be affected?  | Any proposal would need to be supported by an Environmental Impact Assessment.
---|---|---
Dr Nancy Brook  | To remove land from the "greenbelt" is an act of vandalism!!!  | Concern is noted, however this is not an issue that can be considered in the planning process.
Mr Martin Brooks  | The decision could have a major impact on safety on both the A49 and A572 as, when difficulties are encountered on the M6, traffic is diverted unofficially or officially through Newton-Le-Willows.  | The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr William Harry Brown  | We don't want it and we are not going to have it for all reasons mentioned above and more besides.  | Concern is noted, however this is not an issue that can be considered in the planning process.
Mrs Joan Brown  | I feel we have enough traffic problems in and around Newton Le Willows already with new housing going up all over we can't cope with the traffic we already have. God help us if Parkside went ahead, we do not want it.  | The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr Eric Brownbill  | What is the point of a Green Belt Policy? Are there not sufficient rail freight facilities in the area? Air pollution is already too high in the area.  | The Green Belt issue is covered in detail in the original submission and response.
Mr James Browning Edward  | This site would have been an ideal area for a total school complex pre-school to sixth form teaching. Less costly than redevelopment of Selwyn Jones HS and would not infringe on the existing Green Belt.  | Concern is noted, however this is not an issue that can be considered in the planning process. The Green Belt issue is covered in detail in the original submission and response. The present warehousing facilities are old stock and do not meet modern commercial needs and are not rail connected.
Mr Frank Kenneth Bryce  | The whole idea has not been thought out sensibly - The railtrack is illogical and unpractical. Take note of all the empty warehousing facilities in St Helens, Wigan, Leigh, Warrington and even Newton-Le-Willows.  | Issue is covered in detail in the original submission and response. The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr Thomas Bulmer  | In addition to the general green belt issues - which I also feel very strongly about - I feel that the impact extra traffic on already congested local roads (Winwick Lane, Parkside Road, Lane Head) will make the area grind to a complete halt at rush hour. Because the development is on the top of a ridge the light pollution issues will amount to much greater than predicted.  | The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mrs Barbara Bulmer  | In the event of a national food shortage due to climate change or war, it would be vital that every piece of agricultural land is available for production. Most of the green belt land in question is good fertile agricultural land used to grow crops to feed our nation. Once buried under concrete this land can never be used for agriculture again.  | Concern is noted, however this is not an issue that can be considered in the planning process.
Mr Frank Bunting  | Increased traffic, noise air and light pollution impacting on local communities resulting in reduced quality of life. Destruction of wildlife habitats.  | Any scheme would need to be supported by an Environmental Impact Assessment.
Mrs Margaret Bunting  | Concern over destruction of ancient hedgerows and habitats for local wildlife - increase in traffic pollution on an already overstretched length of A49.  | Any proposal would need to be supported by an Environmental Impact Assessment. The policy
Mr Kenneth Burman
This appears to be a road transport facility using its proximity to the main railway line to give it ‘green’ credentials. St Helens is using it as an opportunity for a development, which will only marginally effect its own rate payers whilst ruining the lives and pleasure of adjoining authorities with significant increased road traffic and loss of Green Belt land.

Mrs Pauline Burton
Too much traffic already, don’t believe there will be no increase. Don’t trust council or Planners.

Mr Joseph Butler
Save the green belt.

Mrs Nicola Butterworth
1. The proposals are contrary to policies GB1 and GB2 of the Unitary Development Plan. The increased traffic will have a crippling effect on the A49, A580 and A573. The ability of the local road network to accommodate traffic generated by the development is not possible it will create an unacceptable impact on residential amenity and traffic flows. Also the character and amenity of the area cannot be safeguarded. I would like all those in favour of this development to experience the noise impact on local residents from the development itself or associated road and rail access routes. Anyone who lives in the vicinity of the Alpla plant in Golborne already has to suffer the noise and constant disturbance at all hours. Why does St Helens think it acceptable to subject residents of another borough to more inconvenience effectively driving residents from the area? This is having a massive impact on already lowered property prices. 2. The response times for the Emergency Services must also be considered. The diversion route that will have to be taken means that the services will have to be relocated or residents will be disadvantaged. 3. Measures for the remediation of land affected by contamination, minimisation of environmental impacts including waste management; energy generation by renewable means; energy efficiency; archaeology; agricultural land; air quality; biodiversity; water conservation and sustainable drainage are not sustainable themselves. Paragraph 8.6 states that sites identified within the broad locations should not be used for development that could otherwise be accommodated elsewhere and should not be developed in a piecemeal manner. As shown above the regions requirements are already satisfied and as documented this development will happen in a piecemeal manner. Another contravention of policy.

Mr Christoph Calderbank
Severe congestion to infra-structure Noise/light/air pollution contravenes European limitations.

Any proposal would need to be supported by an Environmental Impact Assessment.
Mr Andrew Cameron

As stated previously, traffic congestion in the area is already a serious problem and unless major highways are built to bypass Warrington, this proposal is a non-starter. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Cllr Paul Campbell

This proposal if it succeeds will not only have repercussions locally but will set a precedent of national consequence that will affect us all and England’s green and pleasant land will disappear forever. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Roy Carter

1. No, no, no to land being taken from the Green Belt. 2. If Planning is for a rail freight terminal then why is a large proportion of the planned warehousing to the east of the M6 with no rail access. 3. No point in having AQMA’s if this monstrosity given go ahead. The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Austin Cawfield

Enough Vehicles on the local roads.

Mr and Mrs Ian and Yvonne Chadwick

This has not been thought out considering the surrounding areas. It is already grid locked with traffic and the small amount of Green Space in North Warrington will be ruined with this planning proposal. The Green Belt issue is covered in detail in the original submission and response.

Mr John Chadwick

Parkside should be used for a more environmentally friendly purpose. It was promised to be returned to Green Belt when planning ran out for the pit. This proposal for Parkside will ruin all the surrounding areas. The Green Belt issue is covered in detail in the original submission and response.

Mrs Bess Chadwick

What a devastating effect this planning application will have on wildlife and rural life. Several villages will be ruined with the effect on the environment with noise and fuel smells. Any proposal would need to be supported by an Environmental Impact Assessment.

Mrs Mary Charleston

I don't want our Green Belt to go, nor do I want our air to be pollution and made any worse than it is for health reasons. The Green Belt issue is covered in detail in the original submission and response.

Mr Martin Chatterton

I object to the proposal that Parkside and surrounding greenbelt land can only be used as a rail freight terminal. How can this proposal be put forward at this time when planning permission has not been granted for such a purpose. Unless of course, the nod has already been given and the decision has already been made against the wishes of the community? Outrageous!!! Concern is noted, however this is not an issue that can be considered in the planning process.

Ms Jennifer Suzanne Chitryn

The traffic is already polluting the air in Newton, this should be solved and not added to. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr Andrew Chorley: Roads and motorways cannot take new capacity. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr John Leslie Clare: We do not need any more traffic going through Winwick. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Ian Claufton: The scale of the development at such close proximity to residential areas gives serious concern for health and well-being of my young son. The northwest already has environmental related illness significantly above the national average and this development will exacerbate the pollution and associated problems. Not a legacy to be proud of for future generations.

Mr Robert Clews: The disruption to residents living in both Newton and Earlestown would be too great and any further industry introduced to the area is a risk to health through further reduced air quality.

Mrs Elaine Clews: I am very concerned about the impact this scale of development would have on the environment in terms of reducing habitat for wildlife and the negative impact on air quality by increasing air pollution and noise.

Mrs Tharma Clowes: Many large storage areas are up for sale close to the Parkside development at present. Why have more? The area of Parkside will affect more people in the Warrington and Wigan Boroughs than the people of the St Helens area. Jobs - what jobs? The type of jobs are not what we want for our children and grandchildren, automation will be a priority.

The new background paper demonstrates a clear need for this type of facility. Existing warehouse facilities are of a poor quality for modern commercial needs and are not rail connected.

1. Issue is covered in detail in the original submission and response.
2. Available for at least 6 weeks.
3. Stock at Deacon does not meet modern requirements and has poor access.
4. Revised background paper addresses this issue.
5. Benefits are clearly outlined.
6. Revised background paper addresses this issue.
7. Revised background paper considers deliverability and viability.
been questioned; the LDF document provides no evidence whatever to show that this requirement to remove land from the Green Belt for a major warehousing development with railfreight terminal is in any way necessary or required.

Mr Matthew Colton
Removing this land from the Green Belt and enabling future developments that would increase motorway traffic would damage Newton-le-Willows itself and also cripple an already busy motorway and bring it to a standstill for the North West in general.

Mrs Suzanne Colton
In addition to the comments above and also the impact this removal of greenbelt land would have on Newton-le-Willows if potential developments were given the go-ahead, the impact on the motorway network itself would surely be reason to prevent this change. I travel on the M6 over Thelwall up to Newton everyday and at present it is often a “car park” due to the volume of traffic. Increasing traffic would bring the network to a stop and also increase the traffic on the surrounding A-roads.

Mr Sidney Keith Connah
Building on and the development of land in the Newton-Le-Willows are has reached saturation point. Taking the Parkside site and adjoining land out of the Green Belt PPG2, making the area available for development will far all residents and the future generations make conditions untenable.

Mrs Janet Connah
1. The Parkside area is an essential green belt buffer zone between the St Helens and Warrington conurbations. 2. The land comprises high quality agricultural land - it is not a brownfield site. 3. The proposal of this in the face of St Helens own planning strategy for the area - residential development and a conservation area only half a mile away. 4. This is the only remaining green belt area of substance in the south of the borough uplifting the surrounding environs for hundreds of families and homes.

Mr Richard Conway
Too much traffic in this area already, we will be swamped by white van man taking short cuts off this development.

Mrs Margaret Conway
Consideration needs to be taken into account, with regards to the increase in traffic along Newton Road. The speed at peak times can be horrendous.

Mrs Dorothy Cook
The replacement of the green belt by a country park, a much smaller strip of manicured land, within a warehousing complex and within sight of containers, waste processing plant and freight noise and air/light pollution is no replacement or substitute at all and is absolutely ridiculous. Also the number of new jobs generated appears very uncertain.

Norma Cooper
The volume of traffic is already horrendous through Warrington if the proposal for yet more development goes through, then it can only end in a nightmare scenario. All local councillors should take note that
the quality of life of their constituents should count and remember this when next asking for their vote!

Mrs Diane Cotton Worried about air pollution, traffic congestion and devaluing of property.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Bernard Court Our countryside is ours not the councils to give away!!

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr & Mrs Alister and Nicola Crawford I object due to all the reasons above plus the fact that the colliery and "outwards" will be removed from greenbelt status so no land is protected outside this site. There should be clear definition on this. Also, although the colliery is classed as a brownfield site it has become a haven for animals due to the trees etc that have matured over the years and is home to barn owls. The impact on wildlife would be immense.

Any proposal would need to be supported by an Environmental Impact Assessment.

Karen Crawford Please take the opinions of local residents into consideration.

This issue is covered in detail in the original submission and response.

Mr Geoff Crawford Please take the opinions of local residents into consideration.

This issue is covered in detail in the original submission and response.

Byron Crellin Total wrong!

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr D Critchley These proposals do not fall within the required classification of 'justified' as the indication of 'possible' employment figures are at best unsound and possibly even 'spurious' as the formula used to calculate/predict these is inappropriate in this instance. Residents are being asked to support a development without having the full story.

Revised background paper addresses this issue.

Mr John Critchley There appears to be a misconception that the strategy is necessary never mind "most appropriate". The most appropriate strategy is to leave the Green Belt untouched and satisfy the wishes of the majority of the electorate who expect the Council to support their views.

The Green Belt issue is covered in detail in the original submission and response.

Mrs Anne Critchley I object to these proposals as they are unjustified in terms of not being supported by the accredited figures relating to employment. Surely the destruction of countryside for no guaranteed return must be bordering on criminal action.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Michelle Croft Live very close to site extremely concerned about noise pollution, the effects on the environment, using green belt land and the effect of the noise and buildings bringing the price of my house down.

Any proposal would need to be supported by an Environmental Impact Assessment.
<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
<th>Response/Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Peter Cross</td>
<td>Please protect your green belt. Thank you.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Mark Cunliffe</td>
<td>I think there are enough empty warehouses and building everywhere else and the countryside is small enough without this happening.</td>
<td>Existing provision does not meet modern needs.</td>
</tr>
<tr>
<td>Peter &amp; Margaret Cunliffe</td>
<td>Why can we have a country park like Sutton Manor? The air round here is already polluted. As an OAP this is effecting my breathing</td>
<td>Any proposal would need to be supported by an Environmental Impact Assessment.</td>
</tr>
<tr>
<td>Mr Allan Davies</td>
<td>What a sad day when you plan to take away what little bit of countryside we have left. Please think again.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mr James Davies</td>
<td>Keep the Green Belts.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Kevin Davies</td>
<td>Don't want more traffic in our area.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mr Anthony Davin</td>
<td>This is yet again St. Helens destroying another part of Newton. You are raping and pillaging our town, allowing building on every available piece of land to generate income which is then spent in St Helens not Newton. Greenbelt was developed to prevent YOU from doing this!</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mrs Lily Davison</td>
<td>We have enough traffic on our roads now, and we don't need a lot more.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mrs Sheila M Dean</td>
<td>Please leave some breathing space in this area - now and for future generations.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mrs Gill Dickinson</td>
<td>I would ask St Helens Council to seriously consider the implications of removing this land from Green Belt. Not only will it make Parkside Interail/freight more likely, but it creates a precedent enabling any piece of land to be so designated for planning purposes.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mrs Mavis Dobson</td>
<td>Where are the 7/10,000 cars which bring the employees here. Parking in Newton is already the station car park - no resident is able to park near their own homes now.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mr John Doherty</td>
<td>I can't imagine what it will be like with the extra traffic.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mr Peter Dooley</td>
<td>This scheme appears to being bulldozed irrespective of local opinion to achieve some style of personal political gratification. To say work will be provided for locals is fantasy and all that will come of it is traffic jams and loss of facility being replaced by bomb site environment.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
</tr>
<tr>
<td>Mr Stephen Doran</td>
<td>I agree with all of the above but would like to add that living in Newton with a young family. My son has already suffering with asthma and I am aware that the M6 corridor and Newton High St are already subject to AQMA this development will increase the air pollution due to the increase in HGV traffic. This insane considering there are already concerns about by Environmental Protection. This</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny</td>
</tr>
</tbody>
</table>
air quality. The assessment will take place based on individual schemes which come forward on a case by case basis.

Mrs Sarah Doran The decision about the framework is not for the best interests of the community. The proposed freight terminal is driving this process and this shouldn't be allowed. Concerned about traffic congestion air quality and pollution.

Mr and Mrs Frank and Brenda Doward Since we have been under St Helens we have been desecrated. They have pulled buildings down which were our heritage just to build houses everywhere and now they want to take our green belt just to make more money - how greedy can they get.

Mrs Carol Eagle Why are the local councils and voters' opinions being totally ignored. This scheme will ruin the area and have an adverse effect on the lives of all who live in the area human and animal. Winick Lane lanehead A580 are already swamped by traffic, to have a 24 hour transport facility added will mean a probable gridlock, this includes the M6 access plans, pollution, air, light and noise will be intolerable.

Mrs Elsie Eaves I can't see why St Helens LDF want all these changes. I can only say since we came under St Helens Council all they have done is take everything away from Earlestown and Newton and money they received for the Newton Grammar School, was spent to better St Helens. I think you all should learn to walk before running into these big ideas.

Mr F Eccleston Keep our green countryside for our grandchildren to enjoy.

Mr Norman Eckersley The protection of Green Belt is a priority both nationally and especially in this local area where we lack countryside - keep the green no more industrial development please.

Mr James Eddleston We moved back to Newton to enjoy a better healthier environment. We will not be able to do this if this goes through.

Mr Eric Edwards This scheme should not go ahead simply because of "air quality" factors alone. As well as too much HGV traffic, which cannot be accommodated on our roads.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Concern is noted, however this is not an issue that can be considered in the planning process.

The Green Belt issue is covered in detail in the original submission and response.

Concern is noted, however this is not an issue that can be considered in the planning process.

Concern is noted, however this is not an issue that can be considered in the planning process.
Mr Kenneth Edwards With Liverpool and Manchester already having good links by rail, roads (A580 and M62) and Manchester Ship Canal, I feel we should retain as much green belt as possible. What about a forest of natural trees to improve air quality?

The Green Belt issue is covered in detail in the original submission and response.

Mr Stuart Edwards I feel let down by St Helens MBC who appear to be ignoring the views of a considerable number of their public, whom they should be serving. Furthermore I feel that MBC should have the guts to hold a referendum on an issue as contentious as this in the same way that Manchester did on congestion charges.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Stuart Edwards There’s little enough Green Belt in this area as it is - without permanently reducing it with this project.

The Green Belt issue is covered in detail in the original submission and response.

Mrs Sybil Edwards Please, please, please save the green belt. With all the air pollution and congestion in this area the development is not a good idea!

The Green Belt issue is covered in detail in the original submission and response.

Mrs Gillian Eels I agree with all the valid reasons above and from a personal point of view this Green Belt area of land should remain green belt. This proposed development should certainly not go ahead at all.

The Green Belt issue is covered in detail in the original submission and response.

Mrs Ellison Maureen I do object to this proposal, please lets keep what is left of the Green Belt!

The Green Belt issue is covered in detail in the original submission and response.

Mrs Gwen Emeegbo Having just moved to the area I am shocked such radical changes are planned.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Brandon Emmett It will adversely affect the quality of life of residents and children in the area. There will be increased levels of nitrogen dioxide, noise and light pollution in an area already suffering with poor quality air.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Brian Evans I object to Parkside.

Any proposal would need to be supported by an Environmental Impact Assessment.

Mrs Gwen Fairfoull There are many children in Winwick especially in Winwick Park, a nursery and lots of babies. Their health could be seriously affected if this development is allowed to happen.

This issue is covered in detail in the original submission and response.

Mr Steven Fallon The value of my property will be affected living so close to the site.

Concern is noted, however this is not an issue that can be considered in the planning process.

Ms Sarah Farrington I am worried about the health of my children due to an anticipated reduction in air quality caused by this rail terminal and extra lorries. We already have 3 major roads in close proximity to our village and 3 rail lines.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr John Field When Parkside NBC Colliery was given planning permission it was conditional upon the land being

The Council can only deal with proposals as they are presented.
returned to green belt after the coal mine closed.

Mrs Ada Field Parkside should be green belt.

Mr Robert Fitzpatrick The infrastructure of the surrounding area is insufficient for the amount of increase in road traffic to the site. Having been in warehousing and distribution myself I dispute the figure of 10,000 jobs being created.

Mrs Zena Fitzpatrick The Countryside is disappearing’ quote National Trust. Gordon Brown, this year, declared a ‘world food shortage’. So tell me why, St. Helens Council, feel it is imperative we stack containers on this fertile green belt land.

Mr Stephen Flanagan The road situation in the area cannot cope with additional traffic either from a congestion or pollution point of view.

Mr John Flatley I purchased my home in 1996 because of the location that is adjacent to Green Belt land. The proposed development of the same would impact my quality of life and the value of my home. I would not wish to continue to live in such a developed area.

Mr Jack Fletcher Mr D Watts MP is reportedly claiming that up to 10,000 new jobs will be created for the area yet no realistic explanation of how this figure was arrived at has yet been provided.

Mr Peter Foley Please SOS Save Our Siblings, and our grandchildren from the air pollution in the area. Keep the greenbelt as it is. No more HGV sites. No more HGVs on local roads.

Dr Michael Ford Once the greenbelt has been concreted over it becomes irretrievable. Greenbelt is steadily being eroded to the detriment of the countryside, wildlife and quality of life for citizens of the country. The need for a massive rail-road interchange has not been demonstrated and the local infrastructure has been shown to be insufficient to support it. In fact it seems to be only in the interests of the developers, whose only motivation is financial (for themselves). There is no benefit for council tax payers and residents who make up the local population. This development would be against national and local interests.

Mrs Christine Ford You have no idea what horrors will be unleashed up our countryside if you allow this to happen. Don’t you care!!! This will be the end of this area as we The Green Belt issue is covered in detail in the original submission and response.

The background paper and Employment land and skills review provide clear evidence supporting this

Concern is noted, however this is not an issue that can be considered in the planning process.

Concern is noted, however this is not an issue that can be considered in the planning process.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Concern is noted, however this is not an issue that can be considered in the planning process.

The new background paper now provides this information.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Concern is noted, however this is not an issue that can be considered in the planning process.
know it!!! This is not progress and no one will benefit!!

<table>
<thead>
<tr>
<th>Name</th>
<th>Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Terence Forshaw</td>
<td>Spare land in Newton is being gobbled up at an alarming rate. Soon we will have nowhere to stretch our legs except in built up land thick with traffic. I have already complained to St Helens Council about our local roads being extremely noisy and congested for 18 hrs a day. What open land we have left should be kept because we are people and not bees who are quite happy to live in a hive much like robots in their way of life.</td>
</tr>
<tr>
<td>Mr Michael Ganly</td>
<td>Has anyone ever considered what an ideal country park it would make?</td>
</tr>
<tr>
<td>Mr Thomas Walter Barry Gannon</td>
<td>I support the protest and believe it (the development) will adversely affect our environment.</td>
</tr>
<tr>
<td>Mrs Shelagh Margaret Gannon</td>
<td>I had previously expressed my concern about the project and now feel even more threatened.</td>
</tr>
<tr>
<td>Mrs Renee Garside</td>
<td>Developing on the Green Belt will not only affect flora and fauna, an area of nature will be lost forever.</td>
</tr>
<tr>
<td>Mrs Ennis Margaret Gaskell</td>
<td>As a resident of Newton High Street for 15 years I have seen an increase in HGVs using this road. The increase in emissions has a detrimental effect on the environment &amp; residents health and well being.</td>
</tr>
<tr>
<td>Mrs Kathryn Gaskell</td>
<td>I do not believe that this project will viable for a national and regional rail freight interchange due to the timescale of loading and unloading and the fact that National Rail want to increase their usage of this main line. Pollution levels are very high in Newton and more traffic would make this worse. This is a big concern for me as I have a child with asthma.</td>
</tr>
<tr>
<td>Mr &amp; Mrs John and Norma Gilchrist</td>
<td>Our property already shudders to the tune of existing HGV traffic. Increased HGVs gives great concern for possible property damage.</td>
</tr>
</tbody>
</table>

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mrs Ethel Mary Goldsack Has anyone given a thought to the 600 plus houses allegedly being built on the former Vulcan land? Traffic from these properties will cause everyone more problems when endeavouring to join the flow of traffic onto the High Street in Newton! Park Road North, with its very narrow bridge, will be the main exit route for these vehicles. Let common sense prevail! Reject the Parkside Plan.

Mr John Gorman Don't agree, Green Belt

Mr Karl Griffiths Original British coal licence stated once mining over site to return to park land/green belt.

Mrs Patricia Grundy Apart from the above, I object strongly to any development on this scale in an area of increasing traffic problems. Kenyon Lane is constantly grid locked by traffic coming down lane to escape problems on M6, M62 etc. So many haulage wagons in area - Golborne has become a death trap.

Mr John Gwatkins I am concerned about the extra traffic using the A49 and other local roads as a result of this development and the related increase in pollution.

Ms Z Haines 1. The proposals are contrary to policies GB1 and GB2 of the Unitary Development Plan. The increased traffic will have a crippling effect on the A49, A580 and A573. The ability of the local road network to accommodate traffic generated by the development is not possible it will create an unacceptable impact on residential amenity and traffic flows. Also the character and amenity of the area cannot be safeguarded. I would like all those in favour of this development to experience the noise impact on local residents from the development itself and associated road and rail access routes. Anyone who lives in the vicinity of the Alpla plant in Golborne already has to suffer the noise and constant disturbance at all hours. Why does St Helens think it acceptable to subject residents of another borough to more inconvenience effectively driving residents from the area? This is having a massive impact on already lowered property prices. 2. The response times for the Emergency Services must also be considered. The diversion route that will have to be taken means that the services will have to be relocated or residents will be disadvantaged. 3. Measures for the remediation of land affected by contamination, minimisation of environmental impacts including waste management; energy generation by renewable means; energy efficiency; archaeology; agricultural land; air quality; biodiversity; water conservation and sustainable drainage are not sustainable themselves. Paragraph 8.6 states that sites identified within the broad locations should not be used for development that could otherwise be accommodated elsewhere and should not be developed in a piecemeal manner. As shown above the regions requirements are already satisfied and as documented this development will

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

The Green Belt issue is covered in detail in the original submission and response.

The Council must deal with proposals as they occur.

Issue is covered in detail in the original submission and response.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

1. We are looking at the plan to replace the UDP therefore the policies will no longer be valid. The Green Belt issue is covered in detail in the original submission and response.

2. Concern is noted, however this is not an issue that can be considered in the planning process.

3. Uncertain which para. 8.6 is referred to. The issue of regional need is dealt with in the original representation and response.
... happen in a piecemeal manner. Another contravention of policy.

Mr Christopher James
At present the M6 motorway already cannot cope with the traffic at certain times of the day. Surely a development of this kind will only make matters worse.

Mrs Claire Hale
The M6 motorway cannot cope with the traffic at times as it is therefore an increase will only cause commuters major problems.

Miss Lisa Hanson
This proposal will bring the roads to a grinding halt in and around Warrington, Winwick and the M6 in this area. The roads are already totally congested it is . . this is a very bad idea.

Mr Robert Harper
I believe the loss of Green Belt at the 1992 earth summit in Rio De Janeiro. The Uk government along with 159 others signed the convention on biodiversity and agreed to take action to halt and reserve the loss of habitats, animal and plant species. Then in 1994 the government published biodiversity in the UK action plan. After 6 years of work by the environment agency English nature and many others around 400 species and 50 plus habitats have action plans providing a blue print for the future of wildlife conservation in the UK. Removing the green belt will be seen as wilful destruction going against the above mentioned. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Peter Jonathan Harris
This is a nightmare in the making for residents close to this site. The underhand way this development is being pushed through is a disgrace.

Mr Ian Harrison
My family have lived in Newton-Le-Willows all our lives and are very concerned that the proposals for the local Green Belt will lead to increased road congestion in areas that are already at dangerous levels. This will also impact on air quality and noise pollution. Aswell as conventional pollution.

Mr Roy Harrison
The proposed development is sited close to a residential area on the grounds of health and environmental aspects the proposal should be banned completely.

Mr R Haskew-Jones
We haven't got much Green Belt in this area so why take what little we do have? Take this plan elsewhere, where they can manage the extra congestion it is going to cause.

Mr and Mrs Ronald and Patricia Haslam
Once land has gained Green Belt status, no local council should have the authority to remove it. They should protect surroundings and conditions that affect people's quality of life.
Mr Peter Hatfield

1. The Green Belt is there to act as an important ‘buffer’ between townships and should be maintained to protect wildlife habitats and in the interest and well being of its citizens. 2. The Air Quality in the immediate area is already ‘poor’ due to heavy traffic pollution, therefore the erosion of the Green Belt will mean future development, the size of a rail freight terminal will have a devastating effect on the lives of the local residents. My wife already has to use an aid to help breathing, we cannot have further pollution brought about by my sudden huge traffic increases. A report/survey by Lancaster university endorsed and highlighted severe health risks associated with traffic pollutions on children and the elderly, in particular this was shown on national tv BBC only a month ago. Please, please St Helens the Green Belt must stay!

The Green Belt issue is covered in detail in the original submission and response. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr John Hayes

It is about time you Councillors and politicians listened to the wishes of residents of the area, instead of you thinking you know what is best for them.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Peter Hayes

Our youngsters deserve career opportunities, not low on un-skilled warehouse work!

B8 sector increasingly requires higher skills as discussed in the Employment Land and Skills Review.

Mrs Jennifer Hayes

It is really important to retain the rural feel of this community as there are so few areas that have this in the vicinity.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr and Mrs Gorden Haynes

1. Property will devalue; and 2. Winick is already a congested area. I.e. Myddlyon Lane and Golborne Lane 3. No mention is made of the housing development on the site of Vulcan Works i.e 600 homes planned

Concern is noted, however this is not an issue that can be considered in the planning process.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Paul Heath

The increased pollution to the area between the A580 and Winwick Lane by the present level of traffic is already unacceptable and will be far worse should these plans be passed.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr and Mrs Hendry

Keep Newton and surrounds a green village - not a highway!

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Roy Heppenstall

We are already awash with traffic, jams, pollution, parking problems. We don't need any extras.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Mrs Joyce Heppenstall We already have problems with noise, pollution, constant traffic movement on M6 also congestion at A580 end and Winwick A49 end. parking problems, constant day and night traffic on Crow Lane East and west High Street, Ashton Road. Noise pollution, vibration, never ending noise. We don't need any more of this.

Mr & Mrs Pat and Terry Hewitt Will Green Belt allocated areas mean nothing to planners in the future.

Mrs Barbara Hewitt Over the last twenty years we have lost a lot of wildlife in this area. It would be a tragedy if we were to lose even more because of this project. As well as the building destroy habitat, the noise and traffic would contribute to this loss.

Mr Peter Hill There is little enough Green Belt land as it is, for people to walk over and enjoy, without reducing this small pleasure even more.

Mrs Margaret Hill We have enough traffic passing along Southworth Road and Mill Lane, Church Street and High Street. These Councillors in St Helens will not be affected by this proposal and are in no position to back this project. There is little enough Green Belt land in our area without reducing it further.

Mr Jeffrey Hodkinson When Parkside came to exist in the early 60s, 95% of the workforce came from outside Newton-le-Willows and not from the local community. Concern is noted, however this is not an issue that can be considered in the planning process.

Miss Margaret Holdgate Leave it alone. Would not be allowed to happen in St. Helens.

Mr John Barry Holgate N-Le-W and the surrounding area will be blighted forever ruining the pleasant town it is now. So much for the HISTORIC TOWN of N-Le-W. Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Alison Holt I firmly believe that the proposed development will have a detrimental and devastating effect on the local landscape where I have lived for 40 years in terms of the impact on the greenbelt boundaries, traffic, environmental pollution and general enjoyment. It is unacceptable to take our natural countryside. The proposed country park is a fabricated and complete inferior replacement. The Green Belt issue is covered in detail in the original submission and response.

Mrs Annie Hopkins Very concerned over the greenbelt ring fencing and removal from greenbelt status. Why can't we have a country park like the Pennington Flash CP. I understand that the Flash is an artificially created lake on colliery site - could that not be achieved here - healthy outdoor pursuits are endless. Put people before money!! Concern is noted, however this is not an issue that can be considered in the planning process.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. The Green Belt issue is covered in detail in the original submission and response. Any proposal would need to be supported by an Environmental Impact Assessment. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Any proposal would need to be supported by an Environmental Impact Assessment. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. The warehouse facilities mentioned are not served by rail.
Mrs Kathleen Houlton If this development were to go through it will bring misery for people and no benefits whatsoever. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr William Howard There are ample unused premises in the area without taking more Green Belt. If these plans are passed the developers will have full control over the whole site and walk over anyone in their path. The Green Belt issue is covered in detail in the original submission and response.

Mr Ronald Howarth I fail to see how anyone can think this is a sound proposal. There are already proposals to consider using the hard shoulder of the M6 at peak times to alleviate the traffic. To superimpose the additional demand on current levels would effectively grid lock the entire locality. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Dawn Hunt Green Belt land should be protected - that is its purpose. Land should not be removed from Green Belt protection. This development is unnecessary and would create havoc on already busy and dangerous roads. Stop trying to fit a square peg into a round hole! The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Marjorie Irvine I am worried about the amount of lorries that will be coming along the High Street. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr James Samuel We are being walked all over. Very unhealthy! No wonder climate change is happening so fast. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Peter Jarvis Have walked with children, grandchildren and beloved dogs over this area for many years, will be devastated to see it go. Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs/ Miss Jacqueline Jarvis It will be so sad after many years walking this land to loose it. Traffic on Newton Road very bad now this will only make it worse. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. The Green Belt issue is covered in detail in the original submission and response.

Mr John Jeffers The area is already densely built-up it is more important to maintain the Green Belt. The Green Belt issue is covered in detail in the original submission and response.

Mr and Mrs Peter and Noreen Johnson This is not a development; it is a decimation of a land area and a community. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Vincent Johnson Traffic is already too busy in the area. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs K Johnson This particular area of green belt is of exceptional importance, being the only green "breathing space" separating the industrial and densely populated areas of Warrington, St Helens and Wigan, Lowton, affording recreational and visual amenity for all using and travelling through it. The Green Belt issue is covered in detail in the original submission and response.

Mr Horace Jolley There is enough pollution and traffic now without more. Ruining the environment we have to live in. We should be aiming to keep the greenbelt and wildlife. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Susan Jolley I'm sick of the traffic passing my house now polluting the air and making noise and worse of all using greenbelt and taking wildlife. We want a clean environment to live in. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr and Mrs Kathleen and George Jones This is a national, not local, concern - green land protection. Sufficient brown land sites exist for this development. The Green Belt issue is covered in detail in the original submission and response.

Mr John Jones The planned development is only to promote our pathetic and corrupt labour mps. Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Keith Jones The number of jobs potentially available to the local area is grossly exaggerated. The council has reassessed this in the new background paper.

Mrs Carole Jones This removal of Green Belt land brings no benefits to the local community and, if the land is developed, brings potentially many risks in terms of traffic congestion and the health risks for local residents from air pollution. A 'Country Park' goes no way in compensating for what is lost. The Green Belt issue is covered in detail in the original submission and response.

Mrs Helen Jones Please please please leave our greenbelt. The traffic/pollution is already affecting Newton le willows with a detrimental effect. The A49 is choked as is stands today. The Green Belt issue is covered in detail in the original submission and response.

Ms Irene Jones I am a professional person who was enticed to live in Newton area a few years ago, with the offer of good standard housing and green belt area around me. If you attract professional people this upgrades the community naturally. However, if this project goes ahead I will leave, as will others. The site impacts directly on me and my family, being next to the site - pollution and noise is my main concern along with losing Green Belt land. The Green Belt issue is covered in detail in the original submission and response.

Mr Keegan Terence I object = very, very strongly object. Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Jeanette Keegan It is impossible to even cross the road etc. Mill Lane - High Street - Southworth Road. It will be 100 times worse if allowed to go through. It is about time people of Newton had a say - not just St Helens Council. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Brian Kelleher I strongly object to the Council's total disregard of previously expressed objections. This issue is covered in detail in the original submission and response.

Mr Arthur Kemp The development would infringe on the green belt. We are already surrounded by motorway traffic noise and frequently the A49 is congested. The development would create more HGTV traffic and noise and pollution levels will increase considerably. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Joan Kennaugh L Please think carefully about using any more Green Belt in Newton-Le-Willows area. We have very little left now we have had numerous large building projects around Newton area over recent years. The Green Belt issue is covered in detail in the original submission and response.

Mr John Kerr As an elderly pensioner, I can remember dirty smoking chimneys and industry as a child - I object to land being removed from the Green Belt as I want to see a greener, cleaner environment for my grandchildren and their children in the future. The Green Belt issue is covered in detail in the original submission and response.

Dr Jane Kevern Concerns about predictable increase in traffic along village roads. Inadequate to cope with such an increase. Big risk to local people. How shortsighted is this? One greenbelt has gone, its gone forever. Decline in local air quality will be significant. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mr Roy Killcross I am extremely concerned about the noise and air pollution problems the project would create by additional traffic on the roads. St. Helens MBC have acknowledged this as creating AQMA conditions on the M6 corridor on the high street. I strongly doubt that sufficient rail paths exist to make the changes envisaged.

Mrs Margaret Killcross I have major concerns about the effects the project will have an air and noise pollution in the Newton area. I already have the beginnings of asthma and this will make it worse. St. Helens Council has already acknowledged the problem by designating the length of M6 in this area as an Air Quality Management Area.

Mrs Janice Knowles When Parkside Colliery was initially constructed the National Coal Board stated that after its useful lifetime the area would be returned to the greenbelt. Quoted by James Anderson Chairman of North West Coal. Now a massive area of greenbelt is to be lost, not just the footprint of the colliery. Why! The whole area will be spoiled.

Mrs Amy Lacey Very concerned about the amount of traffic particularly the increased traffic that would pass Winwick Primary School.

Mrs Linda Lamb Congestion on the High Street, Newton le Willows should be considered. One small vehicle whose driver stops to buy a paper in the high street causes a nightmare. Multiply the chances of this by 20 in one hour it will bring the area into gridlock.

Mrs Gail Leadbetter Very worried about emissions from vehicles which would increase if Parkside went ahead. Pollution levels are already above recommended levels and also large area concreted would lead to extensive flooding.

S Leadbetter Air pollution levels around Newton already too high this will only increase problem and to more children when academy is built on Ashton Road.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Mr Stephen Leather  Go away and find somewhere else!

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Gerard Leeney  Please see attached sheet for my wife's comments and issues - (typed below) Re. proposed road freight terminal at Parkside, Newton-le-Willows. I write to beg that this proposal be refused. During the last 50 years we have lived at the above address and have seen the volume of traffic increase tremendously due to the closeness of the M6 & the A580. When there is any holdup on the M6 Lowton is gridlocked with cars and HGVs seeking alternative routes and any increase in this would be environmentally disastrous for those trying to live here. Clearly there would be a great increase while the terminal was being built and later when it becomes operative. Please do not release green belt land to allow this proposal as the effects of the terminal would be irreversible and devastating for this area. The greenbelt concerned is the last piece of rural land of any size between Manchester and Liverpool. Pollution is already a problem as shown by recent surveys. Wildlife has been shown to be struggling for survival around here and this huge development would ensure its extinction. Please, please, please keep this last large area of land free from development of any kind now and for the foreseeable future and protect its Green Belt status on behalf of the community to whom it means so much. Yours Faithfully. G. Leeney (and Betty Leeny)

Mrs Kathleen Lester  The High Street is already often blocked by traffic coming off the M6 including many HGVs. Another retail park is the 'last thing required' in this area.Green Belt land should remain, if only for the health of the next generation.

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Miss Jenny Lewis  Habitat destruction, traffic

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr C Lewis  Loss of wildlife/greenbelt. Air quality.

The Green Belt issue is covered in detail in the original submission and response. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Mark Lewis  I don’t understand why the council feel that taking Parkside out of Green Belt at the bequest of a private developer is a right and proper action. Traffic will be a nightmare.

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be
Mrs Gillian Lewis  Serious concerns regarding increase to traffic congestion and use of greenbelt.

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Robert Littler  The damage to the local community will have disastrous effects.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Jack Lloyd  I am most concerned about the air quality and traffic density, both of which are very bad and will become disastrous for old people and children.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mrs Tina Lloyd  I live off Southworth Road and the traffic in mornings between 8.30-9am and afternoons 5-6pm is dreadful. I will not leave my street between these times, so things would only get worse.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr David Lockyer  This proposal appears to be setting the scene for the approval of the Parkside development. One can only assume that politicians at both local and national level are trying to force something through against the wishes of the electorate.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Colin Lowe  The proposed Parkside appears to fly in the face of Government strategies to stop the concreting over of swathes of land which leads to flooding.

This will enable transfer to rail freight.

Mrs Ann Lowe  My understanding was that the Government wanted to reduce the number of heavy goods wagons on our roads; this proposal is going to drastically increase it.

This will enable transfer to rail freight.

Mrs Margaret Lowe  The countryside should be preserved, there is also too much traffic in the area without more.

The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Ms Sonia Maria Lyon  This development will potentially increase traffic and pollution compromising the health of my young family, will scar our immediate environment, will increase traffic on our already full-to-capacity local roads.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Scott Mabel  I strongly object to this project because of increased traffic congestion and the anticipated fall in property values that will occur.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Property values are not a planning consideration.
<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Ross MacMahon</td>
<td>I must strongly object to this proposal. I travel along the M6 at this point, apart from the traffic the air pollution will be unhealthy for local people.</td>
</tr>
<tr>
<td>Mr David Maher</td>
<td>No more congestion.</td>
</tr>
<tr>
<td>Mrs Olive Sheila Makin</td>
<td>Cannot find the words to describe how the horrendous intention of these proposals makes me feel. Leaves one speechless. But possibly not helpless.</td>
</tr>
<tr>
<td>Mr Arthur Raymond Malkin</td>
<td>This region in South Lancs has suffered enough from development and loss of farmland and space to walk and roam.</td>
</tr>
<tr>
<td>Mrs Marsh Johanna</td>
<td>Air quality is bad enough around this area due to emissions without adding anymore to it. Plus the fact there is enough congestion along the A49 Winwick through to Newton already.</td>
</tr>
<tr>
<td>Mr and Mrs Margaret and David Mayers</td>
<td>There are enough brownfield sites that are still unused and an eyesore that could be used, why take beautiful countryside and ruin it.</td>
</tr>
<tr>
<td>Mrs Kersten Louise Mayers</td>
<td>I truly believe this development would end the existence of this village as we know it, ruin the environment for miles around and fail to fulfill the economic benefits St Helens Council seem so caught up on. I agree the land should be used, but for benefit of all, not few.</td>
</tr>
<tr>
<td>Mrs Stella McGeachin</td>
<td>Chaos inevitably ensues whenever there is a problem on the M6 and cars and lorries are sent on to the A49. This will inevitably increase with the volume of traffic from Parkside. Drivers will also use the non-designated road when leaving Parkside. Noise, light and especially air pollution will increase most of the jobs in warehousing work is done by automation-I doubt the job creation figures.</td>
</tr>
<tr>
<td>Mrs Jane McVeigh</td>
<td>Traffic - Local roads cannot even cope now @ rush hour. Pollution - Protection of green belt.</td>
</tr>
<tr>
<td>Mr Chris Meila</td>
<td>Air quality in the area is already pool and to replace Green Belt by a polluting operation of this scale will exacerbate the problem. The increase in traffic will cause chaos and misery for residents. The councils involved must co-ordinate and see the problem in its entirety.</td>
</tr>
</tbody>
</table>
Miss Kim Melia  Air quality in the area is already poor and to replace Green Belt by a polluting operation of this scale will exacerbate the problem. The increase in the overall road network, not just the motorway, will cause chaos and misery for residents. The councils involved must co-ordinate and see the problem in its entirety.

Mrs Elizabeth Melia  Air quality in the area is already poor and to replace Green Belt by a polluting operation of this scale will exacerbate the problem. The increase in traffic in the overall road network, not just the motorway, will cause chaos and misery for residents. The councils involved must co-ordinate and see the problem in its entirety.

Mr John Millington  A basic human right is to breathe clean air. At this moment in time St Helens Council are failing to protect all resident as the air we are breathing is not to the Governments standard. Should this destruction of the Green Belt go through then any deaths because of pollution should be accountable.

Mr & Mrs John and Susan Mills  We are against the loss of all Green Belt land.

Mr Donald Montgomeriy  Roads can't cope with the traffic now, the M6 will not.

Mr K Moore  My main concern, apart from the permanent loss of Green Belt land is the obvious effect on the air quality. Thousands of vehicles a day passing through an area already known to be polluted must raise health concerns.

The Green Belt issue is covered in detail in the original submission and response.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

The Green Belt issue is covered in detail in the original submission and response.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Mrs J Moore: The local roads can't cope at the moment with traffic pollution. How can we hope to have better air quality?

Mr Andrew Morgan: We don't need anymore developments, just more Green Belt.

Mr Alan Morris: This proposal will effect Warrington, Winwick, N-L-Willows, Lowton, Golborne and Leigh for more than it would St Helens. There is Green Belt adjacent to railway west of St Helens and much nearer to the centre of that town. If this proposal is such a good idea, given that Wigan, Warrington and West Lancashire Councils have already objected to it, why not relocate the proposal to St Helens Central?

Mrs Vera Morris: Wigan, Warrington and West Lancashire Councils have already objected to this proposal. If St Helens thinks it is such a good idea, why not relocate the proposal nearer to central St Helens where it will affect the lives of citizens of that Borough, rather than those of Warrington, Winwick, N-Le-Willows, Lowton, Golborne and Leigh. Heavy traffic through St Helens is far preferable to heavy traffic passing through the Council areas that have already objected to the proposal.

Mr David Mortimer: St Helens should listen to the voice of Newton-Le-Willows.

Julian Mosquera: I strongly object to the loss of Green Belt, and unnecessary rezoning, when there exists stronger regional options that are more ideally suited logistically to serve the mass population in the North West. To make this decision ahead of a formal planning review of Parkside is reckless and could be construed as complicit.

Mr Alan Moss: The whole roadwork network system in the north west area is at capacity, Monday to Friday during peak periods. Any increase to the current volume of traffic both on motorways and 'A' roads will gridlock the area. No consideration has been given by the council to the environmental or quality of life to residents, both current and future. The only sensible decision that the council can make is to cancel this project permanently.

Mr Philip Moss: The motorway network has eaten up vast chunks of greenbelt land already in this area. To cordon off this land would be a travesty for this area.

Mr William Moss: It is a road to destruction if this Parkside development is adopted. I strongly support all the points made in the Parkside Action Group letter of June 2009.

Mr James Murphy: There is no national or local economic case for this size of project. The plan breaches the well being of local residents and wildlife.

Mrs Jane Murphy: This plan is a breach of the country's Green Belt Strategy and will only increase pollution in the

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Concern is noted, however this is not an issue that can be considered in the planning process.

The site has strategic locational advantages.

The site has strategic locational advantages. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Concern is noted, however this is not an issue that can be considered in the planning process.

The Green Belt issue is covered in detail in the original submission and response.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Issue of scale is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.
Miss Danielle Naylor  
No to Parkside. These roads are busy and many have died.  
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Shaun Naylor  
No to Parkside.  
Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Lynn Naylor  
The council need to take a good look at something for the young generation, instead of allowing flats and houses on every piece of land.  
Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Everett Neill  
The quality of life for people in Newton-Le-Willows would be seriously damaged should such a massive project be authorised.  
Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Dorothy Anne Neill  
I work in Warrington and use the A49 on a daily basis. This road is congested enough. It would be impossible to use this route with all the additional vehicles this project would create. Air quality on the High St. is poor now, what would it be like with these additional vehicles?  
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Gaynor Nobbs  
Too much of our Green Belt land is disappearing. Create more traffic on our already too busy roads. The above you will already have heard but they need to be taken note of.  
The Green Belt issue is covered in detail in the original submission and response.

Mr Alan Noons  
The objection is adequately made by the officials of the Parkside Action Group in items (a) to (e) above.  
Issue is covered in detail in the original submission and response.

Mrs Marion Noons  
I fully agree with everything above.  
Issue is covered in detail in the original submission and response.

Mr Alfred Norman  
The local infrastructure cannot possibly take any more traffic and the prospect brings into question the principle of having Green Belts if they can be removed when big money is involved.  
The Green Belt issue is covered in detail in the original submission and response.  
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Janet Norman  
Please think about the health and we being of people in this area. The air quality concerns, loss of farmland and countryside, the air and open spaces of the Green Belt, concerning the jobs situation employees are likely to relocate rather than new jobs being created. Please keep our Green Belt.  
Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Alexander Norris  
Areas around Winwick and areas cannot cope when accidents happen on motorways and surrounding areas. Pollution is other hazard we can do without, ozone layer at risk already.  
The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr John Henry O'Hara  
Why build in a residential area? Traffic is bad enough. Air pollution very bad already proven in this area. Amount of traffic that would pass through would be horrendous. There must be other tracks of land away from housing that could be used. This

Newton High Street and the M6
The Green Belt issue is covered in detail in the original submission and response. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Paul O'Hara

Don't need any other addition to air pollution, traffic noise by land being removed from Green Belt. Needs to stay exactly how it is to reduce these factors.

Mr Steven O'Hara

I strongly disagree with this with respect to where I live, this will cause traffic chaos.

Mr Gordon Oliver

At a time when money is tight focus on savings not white elephants.

Mrs Margaret Ord

This area is disruptive enough with traffic without having more excessive disruptions.

Ms Michelle Orrell

I am not against progress but in this area there is very little land left and lots of built up areas that aren't used. Keep Green Belt areas.

Mr Kevin Oxley

This development will have a major effect on Golborne due to the every day increase of heavy goods. Specifically on Barn Lane a Class B Road carrying traffic aligned with A Class levels of traffic. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr John Parker

You already have traffic problems on M6. Many tailbacks to Thelwall Viaduct. Parking problems around Newton Station with cars parked on Southworth Road, High Street and surrounding streets. Problems with parking on Ashton Road near woodside site. More traffic, the roads cannot cope and pollution will increase at cost to people's health.

Mr Nick Parr

Please don't let Parkside be built and Newton/St Helens/M6 be destroyed.
Mr Carl Parris

1. The proposals are contrary to policies GB1 and GB2 of the Unitary Development Plan. The increased traffic will have a crippling effect on the A49, A580 and A573. The ability of the local road network to accommodate traffic generated by the development is not possible. It will create an unacceptable impact on residential amenity and traffic flows. Also the character and amenity of the area cannot be safeguarded. I would like all those in favour of this development to experience the noise impact on local residents from the development itself or associated road and rail access routes. Anyone who lives in the vicinity of the Alpla plant in Golborne already has to suffer the noise and constant disturbance at all hours. Why does St Helens think it acceptable to subject residents of another borough to more inconvenience effectively driving residents from the area? This is having a massive impact on already lowered property prices.

2. The response times for the Emergency Services must also be considered. The diversion route that will have to be taken means that the services will have to be relocated or residents will be disadvantaged.

3. Measures for the remediation of land affected by contamination, minimisation of environmental impacts including waste management; energy generation by renewable means; energy efficiency; archaeology; agricultural land; air quality; biodiversity; water conservation and sustainable drainage are not sustainable themselves. Paragraph 8.6 states that sites identified within the broad locations should not be used for development that could otherwise be accommodated elsewhere and should not be developed in a piecemeal manner. As shown above, the region’s requirements are already satisfied and as documented this development will happen in a piecemeal manner. Another contravention of policy. All those involved with this strategy should publicly declare their interests to provide transparency and allow for the rebuttal of any corruption allegations.

Mr Eric Payne

Please reconsider your decision to take the aforesaid land out of Green Belt status as it will adversely affect the lives of hundreds of local residents if your proposal goes ahead.

Mrs Pauline Payne

Please please reconsider, Green Belt land once lost is lost forever. The weight of public opinion should not ignored.

Mr David Peake

The removal of proposed Green Belt areas serves only the interests of St Helens Borough Council and not those of Newton-Le-Willows residents.

Mrs Jennifer Peake

The views of local residents should not be overridden by the self-interest of ‘remote’ decision makers.

Mrs Alma Pedley

My concern is air pollution and noise. Living on the A49 with the volume of traffic at present is bad. If anything goes wrong on the M6 we extra noise and pollution because traffic is directed on our roads.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

The Green Belt issue is covered in detail in the original submission and response.

Concern is noted, however this is not an issue that can be considered in the planning process.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore
developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Dennis H Peel I would underline b.d. and e. Green belts must be sustainable for the future of our countryside, I recognise that changes in planning are necessary but green belts must be protected and not shrunk. Original population belts were East - West along the Mersey. The movement is now North - South. Planning boundaries need to be re-drawn to reflect this change.

The Green Belt issue is covered in detail in the original submission and response

Miss Janet Pickavance I live very close to the two AQMA designated areas and conditions here are likely to be exacerbated by the proposed development as are the already significant traffic problems experienced at the rush hours. If other boroughs see these problems why can't St.Helens??

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Miss Lesley Pickup Stop this development and encroachment into Green Belt. Comply with wishes of residents!

The Green Belt issue is covered in detail in the original submission and response

Mrs Margaret Pilkington Newton people are being choked with worsening pollution, congested on our roads, blocked in by heavy traffic now. Any motorway incident already clogs our roads by people looking for alternative routes. We are already depressed by this situation.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Dr Helena Pimlott-Wilson The development will cause undue stress to the residents, and pollute the air further in the vicinity because of the large no. of HGV's entering the site - we live in an area where the council is monitoring the dangerous CO levels and this will be exacerbated.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Ray Poole It would be more appropriate to follow DEFRA guidelines and use brownfield sites for this development. Green Belt is a precious and shrinking asset.

The Green Belt issue is covered in detail in the original submission and response

Mr William Richard Potts I suffer breathing problems. Any increase in traffic volume would seriously worsen my health.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to
the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Stana Potts Newton-Le-Willows A49 already gets very congested. The surrounding motorways, Winwick and the East Lancs Road, but also Haydock Island gets chaotic. So basically the roads can't cope with more traffic and the pollution is becoming outrageous. We have very little of the Green Belt remaining and subsequently less and less fresh air. Given that three members of my family suffer from asthma and breathing difficulties already the effects from this proposed development could be detrimental.

Mr Ronald Price We already suffer from illicit toxic pollution in this area that the Council do nothing about. The M6 is already heavily congested. The increase noise, pollution and traffic pollution is already at a maximum tolerance.

Mrs Marie Price St Helens Council are making decisions that are contrary to the best interests of its population. There will be increased traffic, noise, pollution. The rail freight terminal that is proposed is not in the best interests of the residents of this area.

Mr Graeme Pye I am appalled at the lack of consideration for air quality and believe this whole concept is flying in the face of intelligent thinking today regarding environmental issues.

Mr John Quormby I strongly oppose the route and proposed development planned for this area and road, and feel it would be detrimental to the area and people who have lived here for many years.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mrs Christine Quormby  We have recently moved into our house on Newton Road and have lived in Lowton for 30 years, we take umbrage at the fact that a beautiful road will be spoiled forever and will become dangerous, noisy, polluted with traffic and totally unnecessary.

Ms Mary Raven  Green spaces are becoming less and less, future generations will have no chance to see a green field.

Mr Martin Redmond  Development could be more considerately completed.

Mrs Jacquline Redmond  The proposed implementation will seriously impact upon our daily travel to work and will cause major traffic congestion in many local villages.

Mr Stephen Rice  We live close to the planned site. Local roads are already heavily congested generating significant pollution. Having attended presentations on the proposed development there is a lack of evidence or modelling, for example, to suggest congestion will reduce and suggestion it could increase which is intolerable.

Mr Mark Richardson  This decision will lead to untold misery for the residents of Newton-le-Willows, with little gain for anybody except Astral. Once this monstrosity is built me and my children will have to live with congestion and pollution for years.

Mrs Jacquelin Richardson  Green Belt should stay Green Belt. St Helens Council don’t care about Newton-le-Willows.

Mrs Marianne Ridgway  Please listen to the local people. Do not take our open spaces.

Mr and Mrs Margaret Roberts  I was born on Highfield Farm, Parkside Road. I moved away when I was married, I have now returned to Lowton. It has been the biggest mistake have made. The traffic off the M6 going down Winwick Lane, lorries going fast on mobiles, etc. I fear for all the family going to and back to work. If this goes ahead we will move. The lorries should not turn off until the East Lancs which was built for them.

Mr and Mrs Alison and Daren Robinson  We do not want this development. There is no real promise of employment. The quality of air in this area is a real shocker especially as most of my family have Asthma! Also the fact that the Rail aspect is not a forgone conclusion?

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

The Green Belt issue is covered in detail in the original submission and response.

Concern is noted, however this is not an issue that can be considered in the planning process.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

The Green Belt issue is covered in detail in the original submission and response.

Issue is covered in detail in the original submission and response.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mrs Lesley Rodon Since St Helen MBC took over our town, they have raped our community and left us for dead. It is time to stop before we are no longer Newton-le-Willows. This green belt has been here since the Doomsday book. Please don't kill our town.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Audrey Roe I old, I'm sure many others in the area have breathing problems. I take medication four times a day to control this. I shudder to think what the extra traffic pollution would do to our quality of life.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Peter Rothwell Please don't let it happen.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Joan Rothwell It would be sinful.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Philip Arthur Round With current environmental issues it is important that Green Belt designated land is protected at all costs for our future generations!

The Green Belt issue is covered in detail in the original submission and response

Mr & Mrs Harold and Joan Rowlinson Listen to local people please. Our green fields are important to us. Do not take them away. Our lives begin to end the day we become silent about things that matter. Martin Luther King Jnr

The Green Belt issue is covered in detail in the original submission and response

Mr Ernest Rudd As a member of the RSPB I have grave concerns over any development of the envisaged magnitude would have on the bird population of the vast area.

Any proposal would need to be supported by an Environmental Impact Assessment.

Ms Sheila Russell The policy you have adopted re 'clean air' - how does this fit in with loss of Green Belt land? This cannot work and the Green Belt is very necessary due to our close proximity to motorways - M6/M62, etc.

The Green Belt issue is covered in detail in the original submission and response

Mrs Janet Saunby f) The decision will lead to loss of habitat for wildlife g) The decision will increase risk to water and air quality h) The decision is likely to result in increased levels of greenhouse gas emissions through increased volumes of traffic i) The decision will produce a negative impact on accessibility to the countryside j) The decision is likely to lead to a substantial deterioration in accessibility to local services and amenities thorough vastly increased road congestion.

Any proposal would need to be supported by an Environmental Impact Assessment. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mr Edward Scholes Clearly on green belt issues alone the application must be refused.

The Green Belt issue is covered in detail in the original submission and response
Mr I H Scott
I object to the potential excessive air pollution this proposal will cause, due to the overload of traffic congestion. Also the loss of grade 2 listed farm buildings etc. This is not necessary to the benefit of local citizens in any way whatsoever.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mrs Lynne Scott
Having tried to access the background papers from the Core Strategy site on two occasions, I was unable to view - each time resulting in hanging up my computer.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Norman Shaw
Lets keep Parkside green. We don't want more traffic, 24hours a day. Come on St Helens do the right thing and keep them out.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Sandra Shaw
Once again local people are not considered by St Helens Council. We want greenbelt. Put astral in your back yard not ours.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mrs Mary Sherman
Leave England's pleasant land Green!

The Green Belt issue is covered in detail in the original submission and response.

Mr Raymond Shimmin
The greenbelt should be saved for future generations.

The Green Belt issue is covered in detail in the original submission and response.

Mr Paul Slee
This document is totally unsound and in general, a disgrace. In addition to the above points the document contradicts itself. How can you say 'take it out of green belt and no planning permission will be granted...except for a freight terminal' - it is 'ring fencing' the area and appears on the side of the developer - absolute corruption!

The Green Belt issue is covered in detail in the original submission and response. Other concern is noted, however this is not an issue that can be considered in the planning process.

Miss Ethel Smith
In an area that has many retail outlets, why increase the amount of building by building a retail outlet? I hope that someone is not succumbing to ???, wanting to build the "biggest warehouse distribution centre ever built in Europe" when it means using green belt land that is part of the "lungs" of the conurbation.

The Green Belt issue is covered in detail in the original submission and response.

Mr George Smith
There are to many HGVs on our roads now.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Leslie Smith
There is little enough open space around N.Le.W without further restrictions.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Raymond Smith
Object to more traffic, noise, pollution and generally dirtier roads and neighbourhood more tatty.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mrs Eileen Smith
Our Roads are far to congested even now.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.
Mrs Freda Spibley  I have objected before and do so again even more strongly we cannot afford to lose valuable agricultural land and the benefits of green belt. Has the effect of the traffic in these narrow roads been really considered?

Ms Susan Spibley  This is a wholly unsuitable development from the perspective of future economic viability, potential greenbelt and sustainability. St Helens Council MBC should rethink their strategy for jobs in the borough.

Mr Nicholas Stewart  The Saint Helens urban area has a vast sprawl of drab terraced housing. To relieve this, Green Belt areas are doubly important. Newton-Le-Willows was an excellent open area with A1 farmland. It is a crime to destroy this.

Mr G Hugh Stockton  Save what bit of greenness remains in this area. The promise of jobs for Newtonians is merely wishful thinking and the local council ought to recognise the fact.

Mrs Ann Stockton  I write to urge you and the Council to think again about the use of Green Belt at Newton-Le-Willows (Parkside off Winwick Road, in particular). Should the Green Belt be reduced for industrial purposes the increased use of the local roads would become intolerable, as the heavy vehicle traffic using the facility will be on the already very busy roads. I live off Southworth Road (an area declared to be suffering excess pollution even now) and the number of heavy vehicles using that road is quite amazing. We see the congestion on the M6 from our house. How can that road cope with such an expected enormous increase of heavy vehicles - projected 6 million per year? I can understand your desire to keep opportunities for work in the area, but that should be considered very carefully. Are you hoping to put workers/employees in a part of the Borough already being 'monitored' because there are two areas in doubt for levels of pollution. I have written to you before as matters have arisen and hoping that good local commonsense and forethought will take the lead.

Ms Julie Stockton  A Green Belt is an essential part of Newton's & St. Helens heritage. It protects the town from merging into Warrington and is beneficial to residents & wildlife.

Mr David Stott  I never cease to be amazed how after being elected our councillors then totally ignore the wishes of the electorate.

Mr Roy Summerscales  In the area between Warrington and Wigan any Green Belt that remains in precious.

Mrs Maureen Sweetlove  Floodlight from this will be 24/7; noise from this will be 24/7; put it in Dave Watts back yard - not ours!

Mrs Edith Talbot  Don't let the 'Historic Town of Newton-Le-Willows' become the 'Monstrous Truck Depot of Newton' for everyone's health and safety, don't do it, please.

Mr Micheal Tarburton  The roads are already heavy with traffic this development with all the extra traffic will raise levels of vehicle emissions to an unacceptable level

The Green Belt issue is covered in detail in the original submission and response.
resulting in serious respiratory and other health problems affecting all the people in the locality.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Mrs Suzanne Tarburton  The increase in traffic, noise, air and light pollution will indeed cause misery to residents across the Boroughs of St Helens, Warrington and Wigan and will make Newton Le Willows an undesirable place to live.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.

Ms Elaine Tasker  Never could believe the proposals for creation of new jobs, more so now that relocation from areas 20 minutes away means no new jobs, no new home sales, no new anything good just worsening traffic problems.

The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.

Mr Paul Taylor  Please take some notice of the feelings of the residents of Newton i.e people who live here.

Concern is noted, however this is not an issue that can be considered in the planning process.

Mr Robert Taylor Richmond  Please keep our Green Belt as it is.

The Green Belt issue is covered in detail in the original submission and response.

Ms Jacquelin e Mary Taylor  Our children are the seventh generation to have lived in Newton. A Total of over 150 years. We love living in Newton and are horrified at the total disregard for the immense impact this development will have on the people and the area of Newton.

Concern is noted, however this is not an issue that can be considered in the planning process.

Ann Templeton  We need to think "GREEN" especially protecting green belt land.

The Green Belt issue is covered in detail in the original submission and response.

Mr Ian Templeton  The greenbelt is not yours to give away! It belongs to the community.

The Green Belt issue is covered in detail in the original submission and response.

Mr Andrew Thompson  I object on the grounds that pollution levels are already dangerously high in this area and it will exacerbate the situation. I object to St Helens selling off Green Belt land at a whim, it is not acceptable.

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Keep the greenbelt and let the residents have a decent quality of life and air to breathe. Too much traffic in Newton and the surrounding area as things stand.

I remember the initial fight against this quite some years ago and my understanding was it was a win for the residents. When is a win a win? Greenbelt should remain greenbelt and not be messed with and concreted over. Residents do deserve a quality of life.

This is a discriminatory application. As planning permission for a private dwelling would not be granted on green belt land - is this green belt or not - or only if it suits the powers that be?

At present, Newton is a very unpleasant place to live. Before further planning applications are considered, the planners responsible for residents well being should ensure that all the unfinished projects currently at a standstill due to recession should be completed. Further planning applications should be required to provide proof that all finance is available to complete the project. The removal of Green Belt land in our town is totally unacceptable for any reason.

Please don't deprive us of our 'green and pleasant land'

The Green Belt is an essential factor of the area and one which encourages residents to live and remain in the area of Newton-le-Willows.

We have little enough of any countryside around here and virtually no wildlife so it is time we encouraged some and not obliterate it! We would also like to have fresh air to breathe!!

Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The Green Belt issue is covered in detail in the original submission and response.
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Kevin</td>
<td>Urmston</td>
<td>Green Belt is a national as well as local environmental asset of considerable importance and protection should be afforded against its piecemeal destruction for the purposes of short term political or financial gain to the detriment of the wider community.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Banks</td>
<td>Vincent</td>
<td>Green belt does not seem to mean anything anymore.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Colin</td>
<td>Waddington</td>
<td>Unless planning laws are upheld and the green belt preserved no area of land will be safe from developers. How many councillors who are making the decision live in the area subject to this development and do they have any vested interest in this scheme?</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mrs Ann</td>
<td>Waddington</td>
<td>The laws governing the protection of green belt are being flouted. Special circumstances need to be proved - and they are not displayed here. People's concerns over health are being ignored. Air pollution will lead to health issues on an unprecedented scale. Irresponsible!</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Ms Rebecca</td>
<td>Wade</td>
<td>Green Belt is essential: - For the maintenance of this area (aesthetically/environmentally) - We do not want these changes - Once lost it can never be replaced! unlike the current proposals, which could be cited anywhere (especially Brown Field sites).</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Derek</td>
<td>Walkden</td>
<td>I cannot see any logic in removing Green Belt when a planning application has not even gone to planning committee.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mrs June</td>
<td>Walker</td>
<td>No Green Belt land should be sacrificed - it should be protected for future generations.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Ms Geraldine</td>
<td>Walker</td>
<td>There is already far too much heavy traffic on the roads round here- anymore would make it even more difficult to get from A-B. Please protect the Green Belt and don't allow it to be developed.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Roy</td>
<td>Weatherilt</td>
<td>Over many years St Helens Council have rigorously defended both Green Belt and conservation areas. Now it appears neither are no longer important, why? The proposed development on the Parkside area would be catastrophic for Newton-Le-Willows and surrounding areas due to both traffic congestion and air pollution in particular. The North West has already been identified as an area with high pollution levels. Therefore we feel strongly that the land referred to in the LDF should not be removed from the existing Green Belt.</td>
<td>The Green Belt issue is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Name</td>
<td>Subject</td>
<td>Additional Information</td>
<td></td>
</tr>
<tr>
<td>---------------</td>
<td>--------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Mrs Weatherilt</td>
<td>How dare anybody spoil our Green Belt and pollute Newton-Le-Willows? (And they will) !!!IF!</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The Green Belt issue is covered in detail in the original submission and response.</td>
<td></td>
</tr>
<tr>
<td>Mr White</td>
<td>The implications regarding the increased volume of heavy duty traffic do not bear thinking about. It is totally unacceptable to expect any community to be subjected to such damage of their quality of life.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
<td></td>
</tr>
<tr>
<td>Mr Anthony</td>
<td>The main adverse impact of this proposal is on the residents of Newton-le-Willows but there are no apparent compensatory benefit within the proposal to recompense the people within Newton-le-Willows, thereby maintaining ‘place’ objectives (or improving) will not be satisfied, contrary to government policy.</td>
<td>Unclear as to which policy is being referred to. Any proposal will be judged on its own merits.</td>
<td></td>
</tr>
<tr>
<td>Mrs Whittaker</td>
<td>Having lived here for 44 years we get far too many heavy goods wagons meeting on the double bend and driving on the pavement, especially when there’s busy traffic on the motorway.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
<td></td>
</tr>
<tr>
<td>Gladys Whittle</td>
<td>Poor air quality (carbon dioxide). What price my children and grandchildren future!!</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The Green Belt issue is covered in detail in the original submission and response.</td>
<td></td>
</tr>
<tr>
<td>Mr Whittle</td>
<td>Objection to LDF Core Strategy.</td>
<td>Issue is covered in detail in the original submission and response.</td>
<td></td>
</tr>
<tr>
<td>Mrs Whittle</td>
<td>Objection to LDF Core Strategy.</td>
<td>Issue is covered in detail in the original submission and response.</td>
<td></td>
</tr>
<tr>
<td>Miss Wilcock</td>
<td>The development of Parkside will have absolutely no benefit to local people. Noise and traffic are at a maximum as it is.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Alban</td>
<td>As a pensioner, negotiating the volume of traffic already is very difficult. If this horrible mad project goes ahead life will be intolerable. Does the development really care. In this greedy atmosphere of today - I don't think so.</td>
<td>The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
<td></td>
</tr>
<tr>
<td>Mrs Wilcock</td>
<td>Being a pensioner suffering with severe chest problems - the present pollution is bad now - given the go ahead for this crazy project life would be very difficult, do the developers consider this - no chance</td>
<td>Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis. The Green Belt issue is covered in detail in the original submission and response.</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Comment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Roger Wilkinson</td>
<td>At my home day and night I can hear traffic on the M6 and the trains all night without extra traffic. Green Belt is not for building on. MP's who vote for this should live next to it.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Stephen Wilkinson</td>
<td>Green Belt Is Green Belt. How can you just decide to change it at will. The Green Belt issue is covered in detail in the original submission and response</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ms Emma Wilks</td>
<td>Greenbelt land should be protected and should remain so. Why spoil natural habitats. The Green Belt issue is covered in detail in the original submission and response</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Lester Williams</td>
<td>Designated Green Belt should be preserved at all costs. The Green Belt issue is covered in detail in the original submission and response</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr John Williams</td>
<td>Since we came under the control of St Helens Council they have shown no regard for the people of Newton or Haydock. If this scheme is allowed to go ahead Newton will be destroyed for ever. Concern is noted, however this is not an issue that can be considered in the planning process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Williams</td>
<td>Excessive amounts of noise and air pollution is very worrying and of concern. The Green Belt issue is covered in detail in the original submission and response</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Sarah Elizabeth</td>
<td>When there is an accident on the motorway you can't cross Winwick Road, the road will be worse if we allow this to happen and object. The policy requires that access to the site will be taken directly from the M6 so the impact from HGVs on local roads should be minimal.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr Jeffrey Wilson</td>
<td>If it is Government land they can change the rules to suit them, if it was private land you would not be able to do this. Concern is noted, however this is not an issue that can be considered in the planning process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Deborah Wilson</td>
<td>This proposal demonstrates again St Helens council's lack of concern to this area and just wants to build business to beat national targets and achieve national recognition. Concern is noted, however this is not an issue that can be considered in the planning process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs Lesley Wilson</td>
<td>As above and recent concerns over air pollution in the area and moments re low rail contribution in proposal. The traffic would be road based and Newton is already very congested. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Mrs Rita Wilson I think it is absolutely disgusting and immoral to even think about building such a monstrosity on our green pleasant "green belt". The numbers they said would be employed is "pie in the sky".

Mr and Mrs Geoffrey and Claire Winter Why don't St Helens Council build this in their own backyard i.e. St Helens, not Newton-Le-Willows. When they stop trying to ruin this once great town of ours. There are plenty of brown sites in St Helens use those.

Mr Jamie Winter Will this development create skilled well-paid jobs. I personally travel 40 miles a day to find this work why can't they do something similar to where Goborne pit in the planning process.

Mrs Aileen Wiswell The beauty of Newton le Willows is that in any direction it is a town in the country - less than a mile in any direction in town and you reach countryside - this will all change and it is an unpleasant legacy for our children.

Mr Robert Wood Deep consideration should be given regarding the long-term impact this development would have on local and surrounding communities. Increased traffic congestion, noise and air pollution. Noise and air pollution from the site itself. More likely traffic accidents.

Mrs Isabelle Wood This town Newton-Le-Willows will be totally overwhelmed by the scale of the project being considered, in every respect. A site in St Helens should be considered especially where former mines have been situated and vacated.

Mrs Anita Woodcock Already have to many traffic problems on High Street - Newton, without more problems. Worst pollution around (Known fact)

Mr David Woodhouse Main Concerns - Congestion. Air Pollution Issue is covered in detail in the original submission and response. Concern is noted, however this is not an issue that can be considered in the planning process.

The Green Belt issue is covered in detail in the original submission and response. The beauty of Newton le Willows is that in any direction it is a town in the country - less than a mile in any direction in town and you reach countryside - this will all change and it is an unpleasant legacy for our children.

The Highways issue is covered in detail in the original submission and response. Newton High Street and the M6 corridor are identified in Policy CP1.3.ii as an Air Quality Management Area. Therefore developments which may affect air quality will be given close scrutiny by Environmental Protection. This assessment will take place based on individual schemes which come forward on a case by case basis.
Miss Lindsay Woodward I am particularly concerned about local air quality and any further development and increase in HGVs will only make this worse. This area should remain the greenbelt.

Mr George Woodward I find the fact that St. Helens Council have disregarded the objectives of local residents a disturbing fact. This proposal to take green belt land from the status it is, opens the door to the Parkside Rail Development and a rise in pollution and drop in air quality of life for local residents.

Mr M Worrall I have got no faith in you as to me it seems that you have started the ball rolling already and think that you have won, you are not listening to us.

Mrs Joyce Wright The AQMA have already been highlighted by St Helens Council as being derogatory to the areas in Newton Le Willows. Higher levels of nitrogen oxide are outright dangerous.

Dr Ian Wynne This Green Belt is of vital importance. Pollution is already a serious health hazard in this area. It would be detrimental to the health and wellbeing of the local population to approve this proposal.

Mr Paul Yates There is a significant amount of housing stock in the area especially with the Vulcan project. It is ridiculous that the council overturned the original objection probably because they didn't get the answer they wanted and will not again.
<table>
<thead>
<tr>
<th>Name</th>
<th>Message</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mrs Karen Yates</td>
<td>It is an absolute disgrace to have public opinion ignored so you can charge extortionate poll tax. It is pure greed to overturn our objections. No one should have the right to completely ruin law abiding, hard working people’s lives. Our lives would be ruined our house unsaleable and worthless you should be ashamed.</td>
<td>Issue of public opinion is covered in detail in the original submission and response.</td>
</tr>
<tr>
<td>Mr Vincent Young</td>
<td>Shouldn't even be worth discussion due to the disruption it will cause.</td>
<td>Concern is noted, however this is not an issue that can be considered in the planning process.</td>
</tr>
<tr>
<td>Mrs Alma Young</td>
<td>Dear Sirs will St Helens council Members please stop and think before going ahead with these monstrous proposals. Do the people of Newton and surrounding areas count for anything at all? Life will be intolerable. What will it take for greed to be replaced by common sense? God willing you will eventually see the light and act accordingly.</td>
<td>Issue of public opinion is covered in detail in the original submission and response.</td>
</tr>
</tbody>
</table>
Appendix 3 – List of people submitting a late cyclostyled representation

Mr Stuart Ainsworth
Shirley Ashton
Mr Christopher James Ball
Miss Kerry Bloor
Mr Ewan Bloor
Mr Mark Bloor
Ms Dorothy Branch
Karen Crawford
Mr Geoff Crawford
Mr John Critchley
Peter & Margaret Cunliffe
Mr James Davies
Mr Kevin Davies
Mrs Lily Davison
Mr Eric Edwards
Mr Steven Fallon
Mr Ian Harrison
Mr R Haskew-Jones
Mr Lawrence Hindley
Mrs Hazel Holland
Mrs Dawn Hunt
Mr Alan Kilshaw
Mrs Dianne Kilshaw
Mrs Amy Lacey
Mr Mark Lewis
Mr Robert Littler
Dr Stanley Lythgoe
Mr David Maher
Christine Melia
Mr Christopher Murray
Mr Anthony Thomas O'Donnell
Mr Graeme Pye
Mr Philip Arthur Round
Mr Nicholas Stewart
Ms Rebecca Wade
Mr George Allan Weaver
Mrs Emma Welsby
Sharon Wright
Mr James Wright
Mrs Joanne York

Appendix 4 – List of inadmissible (late) representations

<table>
<thead>
<tr>
<th>Policy CAS 3.2</th>
<th>Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>82011 Mark Butchard The Mersey Partnership</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1845 Sound? Issue raised before? No</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td></td>
</tr>
</tbody>
</table>

If not, why not?
Not aware
Any other comments?
Support the provision of SRFI at Parkside, due to job creation and significant impact on economy of St.Helens. Proposal is key component of Liverpool SuperPort which seeks to integrate Ports, Airports and Freight Community to improve freight logistics.
Why considered unsound?
What changes required?
Council view
Comments Noted
Justification
Support Noted
Change in Re-Publication Core Strategy
No change

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.

<table>
<thead>
<tr>
<th>Policy CR 1</th>
<th>Minerals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1846</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? No Issue raised before? No

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?
Why considered unsound?
Part 1 of CR1 should include reference to restoration following mineral extraction. Such details should include an assessment of ground stability in accordance with PPG14. Wording suggested.

What changes required?

Council view
No Change Recommended
Justification
CR1 is a strategic policy that will be supplemented by detailed policies in a subsequent Development Management DPD as indicated in paragraph 17.11. Restoration is also covered by MPG7.

Change in Re-Publication Core Strategy
No change

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.

<table>
<thead>
<tr>
<th>17.3</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1847</td>
</tr>
</tbody>
</table>

Legally Compliant? Sound? No Issue raised before? No

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?
Why considered unsound?
There should be a more proactive stance in relation to coal as a mineral resource and the range of minerals present within St.Helens.
What changes required?
A paragraph should be added indicating the range and percentage minerals present.
Council view
No Change Recommended
Justification
In the interests of brevity such details have not been included. It is not considered that the absence of such details would affect the implementation of the policy.
Change in Re-Publication Core Strategy
No change

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.

<table>
<thead>
<tr>
<th>17.3</th>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>316561</td>
</tr>
<tr>
<td>Representation</td>
<td>CSPUB1850</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
</tr>
<tr>
<td>Issue raised before?</td>
<td>No changes</td>
</tr>
</tbody>
</table>

The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?
Why considered unsound?
Prefer term 'surface mining' in place of 'opencast'
What changes required?
Replace 'opencast' with 'surface mining'.

Council view
No Change Recommended
Justification
The public of St.Helens are familiar with the term opencast, any change in terminology could cause confusion.
Change in Re-Publication Core Strategy
No change
17.4  Paragraph

**Respondent**  316561  Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority

**Representation**  CSPUB1851

**Legally Compliant?** Yes, with minor changes  **Sound?** Yes, with minor changes  **Issue raised before?** No changes

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?

**Why considered unsound?**
Whilst the positive approach to prior extraction of minerals is welcomed, the paragraph should reflect the public safety aspects of prior extraction in removing instability problems.

**What changes required?**

**Council view**

Partly Agree Recommend Change

**Justification**
In the interests of brevity such details have not been included. It is not considered that the absence of such details would affect the implementation of the policy.

Change in Re-Publication Core Strategy

No change

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.

17.3  Paragraph

**Respondent**  316561  Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority

**Representation**  CSPUB1852

**Legally Compliant?** No  **Sound?** No  **Issue raised before?** No

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?

Why considered unsound?
No regard is paid to the legacy of past mining activity and the potential for land instability.

What changes required?
Additional paragraph following 17.12 - wording suggested.

Council view
Partly Agree Recommend Change

Justification
The wording suggested is considered too detailed for a Core Strategy, however, in recognition of potential ground stability issues additional wording has been added to policy CP1 (3)(iv)

Change in Re-Publication Core Strategy
Amend policy CP1 (3)(iv) "Ensure the site of the proposed development is not contaminated and/or unstable or that provision can be made for its remediation to an appropriate standard taking into account its intended use and making use of sustainable remediation technologies."

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.

17  Meeting St. Helens Resource and Infrastructure Needs

Respondent 316561 Miss Rachael Bust Deputy Head of Planning and Local Authority Liaison Department The Coal Authority

Legally Compliant CSPUB1853
Sound?
Issue raised No before?

If not, why not?
The Coal Authority set up a new Planning and Local Authority Liaison Department in April 2008 to re-engage with the planning system and only became a specific consultation body through the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Our main issues of interest for policy making relate to the safeguarding of coal as a mineral and ensuring that future development is undertaken safely to reduce the liability on the public purse for subsidence and other mining related hazards arising from the legacy of coal mining.

Any other comments?

Why considered unsound?
Surprised that no reference is made to the promotion of new energy technologies. Suggest wording for new paragraph regarding new coal technologies together with an explanation in the Glossary of new wording introduced.

What changes required?
New paragraph and Glossary entries suggested.

Council view
No Change Recommended

Justification
Such references are considered too detailed for a Core Strategy and would be dealt with through a Development Management DPD.

Change in Re-Publication Core Strategy

No change.

Reason for correction: Representation received after closure date but omitted from February 2010 Report of Representations submitted.