Local Development Framework


January 2011
St.Helens Council will re-publish the St.Helens Core Strategy in January 2011 for representations to be made on it, prior to submission to the Secretary State for Examination by an independent planning Inspector. The six-week period for representations runs from 27th January 2011 to 9th March 2011. At the same time we will be making available (along with other documents) the “Report Of And Council's Response To Representations Submitted [On Publication Core Strategy 2009] And Council Responses, 18th March 2010”. This sets out summaries of representations made on the May 2009 Publication Core Strategy and the Council's response. It was first made available for information in March 2010, having been approved by Executive in January 2010. It is not a statutory document required for the re-publication of the Core Strategy or examination, nor does it affect the ability of people to make representations, and full copies of everyone's May 2009 representations will be passed to the Planning Inspector. However, it can help people who submitted representations understand what the Council's position is.

Since the 18th March 2010 report was published, the decision to go out to a “Re-Publication” representation period was made. The Core Strategy has been updated to take account of changes in circumstances and as many of the issues raised in the May 2009 and March 2010 representation periods as possible. Accordingly, the 18th March 2010 report would benefit from a schedule of minor amendments resulting from the changes to the updated Re-Publication Core Strategy and other changes in circumstances that affect how we have previously responded to representations.

Planning officers checked through the March 2010 report when making changes to the Core Strategy and afterwards, and there would be no significant changes to the Council's response to the representations. There are no changes of the Council View from “Agree recommended change [requested by the representor] ” to “No change recommended” or vice versa. There is one case of “Agree recommended change” to “Partly agree recommended change”, arising from an inability to make a change in a requested location due to other changes. There is one case of “No change recommended” to "Partly agree recommended change", relating to access to the Strategic Road Network. There is one case of amending “Partly agree recommended change” to “Agree recommended change”, relating to our recognition that Minerals Safeguarding Areas need to be reconsidered and addressed in the Allocations DPD. The majority of other changes are to update the response with the latest version of text in the Core Strategy. None of the changes to the Council’s responses are significant and there are no changes to the Core Strategy required.

The authority for the Director of Urban Regeneration and Housing to amend the 18th March 2010 report comes from item 125 of the report on 27th January 2010 to Executive on re-publishing the Core Strategy for representations in March 2010, which included the following decision:
“(7) the Director of Urban Regeneration and Housing be authorised to make minor changes to the documents prior to publication and following the representation period. Any changes of substance to be agreed between the Director for Urban Regeneration and Housing and Portfolio Holder for Urban Regeneration.”

The changes are considered to be minor and not “changes of substance” as they do not significantly affect the nature of the original March 2010 responses, affect the overall content of the Re-Publication Strategy nor does the 18th March 2010 report affect how the Planning Inspector will deal with people’s representations. This schedule of amendments contains a summary of the changes, plus the full amendments to the 18th March 2010 responses to representations. No representations are invited on this document, it is intended only to help people who submitted representations understand what the Council’s position is.
### Section 1: Summary of amendments

**Key:**
- “Council view” = Agree or part agree or do not agree with change recommended by person making representation
- “Justification” = Council officer justification of “Council View”
- “Change” = Change recommended by Council officer in response to representation

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<tr>
<th>Page</th>
<th>Chapter</th>
<th>Part</th>
<th>Rep</th>
<th>Organisation or Person &amp; Respondent ref no</th>
<th>Amendment(s)</th>
<th>Significance of amendment and reason why needed</th>
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<tbody>
<tr>
<td>N/a</td>
<td>N/a</td>
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<td>N/a</td>
<td>N/a</td>
<td>All references in document to “Allocations and Proposals Map DPDs” should be “Allocations DPD and Proposals Map”</td>
<td>Minor change: clarifying that Proposals map is not, in itself, a DPD</td>
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<td>15</td>
<td>1</td>
<td>1.11</td>
<td>1753</td>
<td>Environment Agency 81648</td>
<td>Amend justification and “Change” to explain that requested changes have now been made in November 2010 Addendum to SA/SEA report rather than original SA/SEA report.</td>
<td>Minor change: issue raised in representation (“rep”) still addressed but in different place</td>
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<td>25</td>
<td>2</td>
<td>2.18</td>
<td>248</td>
<td>GONW 315762</td>
<td>Amend “Change” from March 2010 change to updated January 2011 change to paragraph 2.18A [see Change: A_02_07 (Formerly: CSRP_02_01)]</td>
<td>Minor change: paragraph 2.18 updated to reflect end of Growth Point, but representation is still addressed by paragraph</td>
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<td>27</td>
<td>3</td>
<td>3.13</td>
<td>718</td>
<td>MEAS 82491</td>
<td>In “Change”, amend 10% to 16% [see change: A_03_06 (Formerly: CSRP_03_01)]</td>
<td>Minor factual change: More sites in positive conservation management, still addresses rep</td>
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<tr>
<td>31</td>
<td>4</td>
<td>Visi</td>
<td>1731</td>
<td>Cllr B Spencer 81474</td>
<td>Amend “Change” regarding footnote to Spatial Vision refer to “SFRI” instead of “Parkside” [see Change: A_04_01 (Formerly: CSRP_04_01)]</td>
<td>Minor change for accuracy to refer to “SFRI” instead of “Parkside”</td>
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<td>31</td>
<td>4</td>
<td>Visi</td>
<td>1741</td>
<td>4NW 364564</td>
<td>Amend “Change” of new paragraph 12.3A to add “or Development Management DPD” to “Climate Change DPD” [see Change: A_04_01 (Formerly: CSRP_04_01)]</td>
<td>Minor change for accuracy as Climate Change DDP could be merged with Development Management DPD</td>
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<td>37</td>
<td>6</td>
<td>CSS</td>
<td>252</td>
<td>GONW 315762</td>
<td>Amend “Change” to CSS1 part 1 (viii) from March 2010 amendment to latest January 2011 change. [See Change: A_06_03 (Formerly CSRP_FC_06_01)]</td>
<td>Minor change: Core Strategy change updated to better address issues raised in representations, no impact on response to representation</td>
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<tr>
<td>41</td>
<td>6</td>
<td>CSS</td>
<td>1742</td>
<td>Church commissioners 81563</td>
<td>Amend “Justification” to replace “through” with “following”, as paragraph 6.10 has been updated. [see Change: A_06_12]</td>
<td>Minor change: paragraph 6.10 has been updated from “through a sub regional assessment” to “following a sub regional assessment”</td>
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<td>49</td>
<td>7</td>
<td>7.5</td>
<td>727</td>
<td>MEAS 82491</td>
<td>Amend “Change” to delete “and” from in front of “Creating new green infrastructure” in paragraph 7.5 [see Change: A_07_10 (Formerly: CSRP_07_02)]</td>
<td>Minor grammatical correction made to Core Strategy</td>
</tr>
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<td>Page</td>
<td>7</td>
<td>7.5</td>
<td>728</td>
<td>MEAS 82491</td>
<td>Amend “Change” to refer to January 2011 text for paragraph 16.26</td>
<td>Minor change in CS to refer to “North West”, not “New”, Water Vole Project.</td>
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<tr>
<td>52</td>
<td>8</td>
<td>CAS 2</td>
<td>731</td>
<td>MEAS 82491</td>
<td>Amend “Justification” so that it no longer refers to PPS6 (deleted) or “draft” PPS4 (now adopted)</td>
<td>Minor change: PPS6 replaced by PPS4, no affect on reply to representation</td>
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<tr>
<td>52</td>
<td>8</td>
<td>CAS 2</td>
<td>1744</td>
<td>English Heritage 81646</td>
<td>Amend “Change” so it replaces March 2010 text with January 2011 text for CAS2 point 7 i.e. replaces “undertaking” with “reviewing”. [See change: A_08_15 (Formerly: CSRP_08_12)]</td>
<td>Minor change to CAS2 point 7 – does not affect change requested by representation</td>
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<td>68</td>
<td>9</td>
<td>CAS 3.2</td>
<td>754</td>
<td>Gresham House Plc 374466</td>
<td>Amend “Justification” from “The Council does not wish to focus on residential development for this site as it would prejudice delivery of the Earlestown Town Centre AAP” to “The status of this site is best dealt with in the Allocations DPD, which will be able to take account of any change to the site, including any resulting from the recent planning permission for residential development”</td>
<td>Minor change: the officer recommendation that this should not be dealt with in Core Strategy remains, but slight amendment needed to clarify that this will be dealt with in Allocations DPD</td>
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<tr>
<td>126</td>
<td>11</td>
<td>CAS 5</td>
<td>737</td>
<td>MEAS 82491</td>
<td>Amend “Change” so it correctly refers to CAS5 instead of CQL3 [See change: A_11_06 (Formerly: CSRP_11_02)]</td>
<td>Minor change: mistakenly referred to CQL3 instead of CAS5 in report but change was correctly made to CAS5</td>
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<tr>
<td>135</td>
<td>13</td>
<td>CP2</td>
<td>1840</td>
<td>Highways Agency 82085</td>
<td>Amend “Council view” from “No change recommended” to “Partly agree recommended change”; Amend “Change” so it refers to “Strategic Road Network”, not “Strategic Route Network”</td>
<td>Minor correction required of terminology used in Core Strategy – does not affect overall response</td>
</tr>
<tr>
<td>138</td>
<td>14</td>
<td>CH1</td>
<td>261</td>
<td>GONW 315762</td>
<td>Amend “Justification” to explain changes to policy approach that still address issues raised in representation: 1) Growth Point uplift of 20% no longer included; 2) undersupply will now be from 2023 not 2021; 3) 30 d.p.h. still required but phrased differently; 4) paragraphs 14.15 &amp; 14.16 updated with new dates to reflect new estimated CS adoption date. [See changes: A_14_01 &amp; 07 &amp; 26 &amp; 27; A_App1_02 &amp; 16; A_14_03 &amp; 05.]</td>
<td>Minor changes to justification required as CS updated but issues raised in representation still addressed by latest changes</td>
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<tr>
<td>144</td>
<td>14</td>
<td>CH1</td>
<td>1746</td>
<td>Bellway Homes 167432</td>
<td>Amend “Justification” regarding point 6 as 20% Growth Point uplift no longer included but overall policy direction maintained</td>
<td>Minor change: factual correction does not significantly change response or require a change to policy</td>
</tr>
<tr>
<td>146</td>
<td>14</td>
<td>14.5</td>
<td>264</td>
<td>GONW 315762</td>
<td>Amend “Council view” from “Agree recommended change” to “Partly agree recommended change”; Amend “Justification” to explain paragraph 14.5 deleted as Growth Point 20% uplift removed so representation no longer relevant; Amend “Change” to refer to deletion of paragraph 14.5 [See change: A_14_12 (Formerly: CSRP_14_12)]</td>
<td>Minor update: Growth Point uplift of 20% has been removed so requested change no longer relevant</td>
</tr>
</tbody>
</table>
| 147  | 14 | 14.1 | 351 | GONW 315762 | Update “Justification” to add “Wording in the existing bullet points will be updated with the latest information from the 2010 SHLAA.” | Minor update to justification and change to account for latest monitoring report (difference of
Further wording will also be added to expand the justification behind increased densities and Green Belt release." and update "Change" from 374 units to 373. [See change: A_14_28 (Formerly: CSRP_14_25)]

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<tr>
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<th>File No.</th>
<th>Action</th>
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<tr>
<td>149</td>
<td>14</td>
<td>CH2</td>
<td>GONW 315762</td>
<td>Update</td>
<td>&quot;Justification&quot; and &quot;Change&quot; to refer to 14.22B and instead of 14.24A [See change: A_14_37 (Formerly: CSRP_14_28)]</td>
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<td>153</td>
<td>15</td>
<td>CE1</td>
<td>Gresham House Plc 374466</td>
<td>Update</td>
<td>&quot;Justification&quot; to explain policy has been updated as requested and Amend &quot;Change&quot; to &quot;Change ref: A_15_05&quot; [See change: A_15_05]</td>
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<tr>
<td>154</td>
<td>15</td>
<td>CE1</td>
<td>Jockey Club 83494</td>
<td>Amend</td>
<td>&quot;Justification&quot; to explain Racecourse is only identified as a possible candidate, a Major Developed Site in the Green Belt, for consideration during preparation of the Allocations DPD.</td>
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<tr>
<td>155</td>
<td>15</td>
<td>CE1</td>
<td>DPP Planning 223810</td>
<td>Amend</td>
<td>&quot;Justification&quot; to: &quot;Policy re-worded to improve application and clarity. Disagree that employment sites are automatically suitable for leisure and retail. They remain subject to the Impact Test and Sequential Test set out in PPS4.&quot; [See change: A_15_06]</td>
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<tr>
<td>156</td>
<td>15</td>
<td>CE1</td>
<td>NWDA 82550</td>
<td>Amend</td>
<td>&quot;Justification&quot;: 1) employment land provision now increased to 46Ha; 2) references and calculations relating to Parkside and Omega have been updated in light of representations; Amend &quot;Change&quot; to reflect latest changes to policy CE1. [See changes: A_15_01 &amp; 02 &amp; 03 &amp; 23 &amp; 24 &amp; 25 (Formerly: CSRP_15_01 &amp; 02 &amp; 03 &amp; 16 &amp; 17 &amp; 18)]</td>
</tr>
<tr>
<td>159</td>
<td>15</td>
<td>CE1</td>
<td>Roseland/Oakham Developments 366518</td>
<td>Amend</td>
<td>&quot;Justification&quot; to update latest position on Green Belt</td>
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<tr>
<td>170</td>
<td>17</td>
<td>CR1</td>
<td>Coal Authority 316561</td>
<td>Amend</td>
<td>&quot;Council view&quot; from &quot;Partly agree recommended change&quot; to &quot;Agree recommended change&quot;; Amend &quot;Justification&quot; to acknowledge weaknesses with the two Minerals Safeguarding Areas as originally designated an explain they have been withdrawn and MSAs will now be designated in the Allocations DPD. [See change: A_17_09]</td>
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<td>173</td>
<td>17</td>
<td>17.1</td>
<td>GONW 315762</td>
<td>Amend</td>
<td>&quot;Change&quot; with latest estimated Waste DPD adoption date. [See change: A_17_16 (Formerly: CSRP_17_03)]</td>
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</tbody>
</table>

Minor update – paragraph moved
Minor update: Policy now updated; changes requested still made
Minor update: Policy updated but does not affect “No change recommended” response to representation
Minor update: Policy has been updated but does not affect response to representation
Minor update: Policy has been updated and hopefully now better addresses issues in Representation
Minor update to reflect latest policy position - no affect on overall response to representation
Minor update: Update to position consistent with changes made to policy CR1 regarding MSAs reported to 12th January Council.
Minor update: latest estimate of Waste DPD adoption date
Section 2: Updated Summaries of, and responses to, Representations

Please note:

1) Due to technical problems beyond the Council's control, the “tracked changes” (underline and strikethrough text showing where changes made) in the “Change in Re-Publication Core Strategy” box have been lost in this document. The old “tracked changes” can still be seen in the “Report Of And Council’s Response To Representations Submitted [On Publication Core Strategy 2009] And Council Responses, 18th March 2010”.

2) “Change in Re-Publication Core Strategy” refers to either a Focused Change or Minor Post Publication Change originally made available for representations in March 2010, not the changes made available for representation in January 2011.

3) Because of the technical problem described in 1) above, any “Revised Recommended Change” cannot be shown below, but can be seen in the document “Amendments to Publication Core Strategy Since May 2009”, January 2011

1.11 - Paragraph

Respondent 81648  Dawn Hewitt  Environment Agency (NW Regional Office)

Legally Compliant? Yes  Sound? Yes, with minor changes

If no, 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
Comments Noted

Justification
SA Report reviewed and addendum prepared, therefore original text not revised.

Change in Re-Publication Core Strategy
No change recommended

Has the Response to this Representation been revised since May 2009? Yes

Revised Officer Recommendation
Comments Noted

Revised Justification for Recommendation
The November 2010 SA/SEA Addendum Report will include the requested change

Revised Recommended Change
Include "It is expected that climate change will increase flood risk over the longer term." within the November 2010 SA/SEA Addendum Report

2.18 - Paragraph

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

Representation CSPUB248
Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? | No

If no, why not?
Issue didn't arise at earlier official stages on which we commented.

Any other comments?
This relates to the soundness test of being justified.

Why considered unsound?
Page 16- the contextual box on the Growth Point should indicate why the implications of the Growth Point have not been consulted on before now: we understand from you that it will not have any major implications, just that some of the proposed sites will be developed faster- this needs to be explained in support of your decision not to re-consult.

What changes required?
Explain why the implications of the Growth Point proposals have not been consulted upon until now, and their implications.

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.

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

Revised Justification for Recommendation
Slight amendment to wording change for clarity.

Revised Recommended Change
Change ref: A_02_07 (Formerly: CSRP_02_01)

3 - Issues, Problems and Challenges

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

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

If no, why not?

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?
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.

Council View
Agree Recommend Change

Justification
Agree that the chapter focuses 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'.

**Has the Response to this Representation been revised since May 2009?**

Yes

**Revised Officer Recommendation**

Agree Recommend Change

**Revised Justification for Recommendation**

Percentage of Local Wildlife Sites in positive conservation management has increased to 16%.

**Revised Recommended Change**

Change ref: A_03_06 (Formerly: CSRP_03_01)

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### 4 - St. Helens in 2025

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<thead>
<tr>
<th>Respondent</th>
<th>81474 Councillor B Spencer</th>
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<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1731</td>
</tr>
<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
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<td>Issue raised before?</td>
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<th>If no, why not?</th>
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<th>Any other comments?</th>
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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.

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<tr>
<th>Council View</th>
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Partly Agree Recommend Change

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<th>Justification</th>
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It is agreed that the current status of Parkside should be acknowledged,

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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."

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<th>Has the Response to this Representation been revised since May 2009?</th>
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Yes

**Revised Officer Recommendation**

Partly Agree Recommend Change

**Revised Justification for Recommendation**

It is agreed that the current status of the SFRI at the former Parkside colliery site should be acknowledged,

**Revised Recommended Change**

Change Ref: A_04_01 (Formerly: CSRP_04_01)

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### 4 - St. Helens in 2025

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<thead>
<tr>
<th>Respondent</th>
<th>364564 Ms Sam Turner, Principal Planning Officer 4NW</th>
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<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1741</td>
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<tr>
<td>Legally Compliant?</td>
<td>Sound?</td>
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<td>Issue raised before?</td>
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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."

**Has the Response to this Representation been revised since May 2009?**  
Yes

**Revised Officer Recommendation**  
Partly Agree Recommend Change

**Revised Justification for Recommendation**  
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.

**Revised Recommended Change**  
Change ref: A_12_18 (Formerly: CSRP_12_06)

<table>
<thead>
<tr>
<th>7.5 - Paragraph</th>
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**Respondent**  
82491 Miss Lesley Bye

**Contaminated Land Team Leader**  
Merseyside Environmental Advisory Service

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

If no, why not?

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
Agree Recommend Change

**Justification**
Agree to include the term 'Green Infrastructure' with the justification paragraph 7.5 as this is supportive of the importance of Green Infrastructure within the plan. Suggest re-wording of the sentence.

**Change in Re-Publication Core Strategy**
'The policy aims to direct development to appropriate areas to redress this inequality and significantly improve the core area environment by: removing dereliction; creating new uses of greenspace creating new green infrastructure ; provision of local services and improved public transport services'.

**Has the Response to this Representation been revised since May 2009?**
Yes

**Revised Officer Recommendation**
Agree Recommend Change

**Revised Justification for Recommendation**
Agree to include the term 'Green Infrastructure' with the justification paragraph 7.5 as this is supportive of the importance of Green Infrastructure within the plan. Suggest re-wording of the sentence.

**Revised Recommended Change**
Change ref: A_07_10 (Formerly: CSRP_07_02)

### 7.9 - Paragraph

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<th>82491 Miss Lesley Bye Contaminated Land Team Leader Merseyside Environmental Advisory Service</th>
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<td>Yes</td>
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</table>

**If no, why not?**

**Any other comments?**
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 text 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'.

**Has the Response to this Representation been revised since May 2009?**
Yes

**Revised Officer Recommendation**
Partly Agree Recommend Change

**Revised Justification for Recommendation**
To provide clarity as to the definition of ecological frameworks and the content of the Biodiversity SPD and how it relates to the Biodiversity policy.

**Revised Recommended Change**
Change ref: A_16_22

### 14.5 - Paragraph

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

<table>
<thead>
<tr>
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<td>Issue raised before?</td>
<td>No</td>
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</table>

If no, why not?
Previous wording

Any other comments?

Why considered unsound?
Add 'net' to the figures in the last sentence of para 14.5 rather than 'gross' to avoid confusion on gross completion figures.

What changes required?
Change the word 'gross' to net in the last sentence of para 14.5.

Council View
Agree Recommend Change

Justification
Agree that paragraph 14.5 will be reworded to include a reference to a "net", rather than "gross", housing requirement.

Change in Re-Publication Core Strategy
Paragraph 14.5 reworded to read: "...This results in a total gross net requirement of..."

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Partly Agree Recommend Change

Revised Justification for Recommendation
Paragraph 14.5 deleted to remove reference to a 20% Growth Point uplift on the housing requirement. St.Helens’ aspiration for growth is incorporated within the housing target of 570 dwellings per annum.

Revised Recommended Change
Change ref: A_14_12 (Formerly: CSRP_14_12)

14.16 - Paragraph

Respondent | 315762 | Mrs Dianne Wheatley | Spatial Development Manager Government Office for the North West
| CSPUB351 |

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

If no, 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 para 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 This 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 ..."

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

Revised Justification for Recommendation
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. Wording in the existing bullet points will be updated with the latest information from the 2010 SHLAA. Further wording will also be added to expand the justification behind increased densities and Green Belt release.

Revised Recommended Change
Change ref: A_14_28 (Formerly: CSRP_14_25)

17.17 - Paragraph

Respondent | 315762 | Mrs Dianne Wheatley | Spatial Development Manager, Government Office for the North West
Representation | CSPUB403 |

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

If no, why not?

Any other comments?
Minor textual comment

Why considered unsound?
Timetable for Waste DPD needs updating

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"

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

Revised Justification for Recommendation
To reflect revised timetable

Revised Recommended Change
Change ref: A_17_16 (Formerly: CSRP_17_03)

Policy CAS 2 - Town Centre Strategy

Respondent | 82491 | Miss Lesley Bye | Contaminated Land Team Leader, Merseyside Environmental Advisory Service
Representation | CSPUB731 |

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

If no, why not?
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 Change 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 Council’s aspirations to redevelop these areas for housing and office developments.

Change in Re-Publication Core Strategy
No Changes Required.

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
No Change Recommended

Revised Justification for Recommendation
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. Draft PPS 4 does not class industrial development as a town centre use. The areas in question are also covered by the Eastside Masterplan, which highlights the Council’s aspirations to redevelop these areas for housing and office developments.

Revised Recommended Change
No change

Policy CAS 2 - Town Centre Strategy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>81646</th>
<th>Judith Nelson</th>
<th>English Heritage (North West Region)</th>
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| Representation | CSPUB1744 |

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<td>Issue raised before?</td>
<td>No</td>
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If no, why not?
The issue was not raised previously because detailed wording within the policy had not been included.

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 the following wording - 'and implement Conservation Area Management Plans'.

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 'and implement Conservation Area Management Plans'.

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

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

**Revised Recommended Change**
Change ref: A_08_15 (Formerly: CSRP_08_12)

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

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<tr>
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<tr>
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<td>CSPUB754</td>
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**Legally Compliant?** Yes  **Sound?** Yes, with minor changes  **Issue raised before?** No

**If no, 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

**Has the Response to this Representation been revised since May 2009?** Yes

**Revised Officer Recommendation**
No Change Recommended

**Revised Justification for Recommendation**
The status of this site is best dealt with in the Allocations DPD, which will be able to take account of any change to the site, including any resulting from the recent planning permission for residential development

**Revised Recommended Change**
No Change

### Policy CAS 5 - Rural St. Helens

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**Legally Compliant?** Yes  **Sound?** Yes, with minor changes  **Issue raised before?** Yes
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<td>any other comments?</td>
<td>We suggest amendment of Part 3 ii to: “Protect, enhance and manage biodiversity.”</td>
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<tr>
<td>why considered unsound?</td>
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<tr>
<td>what changes required?</td>
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**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**

Policy CAS5 Part 3 (ii) currently reads ‘Manage and Enhance Biodiversity’. Now to read ‘Protect, manage, enhance and create biodiversity’.

**Has the Response to this Representation been revised since May 2009?**

Yes

**Revised Officer Recommendation**

Partly Agree Recommend Change

**Revised Justification for Recommendation**

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 Policy CAS5 part 3 point (ii) in line with policy CQL 3 to include both "protect" and "create".

**Revised Recommended Change**

Change ref: A_11_06 (Formerly: CSRP_11_02)

### Policy CE1 - A Strong and Sustainable Economy

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<tr>
<th>Respondent</th>
<th>374466</th>
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<th>Sound?</th>
<th>Yes, with minor changes</th>
<th>Issue raised before?</th>
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</table>

If no, 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?

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 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 as and period of time agreed with the Council; VI Is the subject of a Development Brief agreed with, and adopted by the Council;

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

Revised Justification for Recommendation
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. Point 3 of policy CE1 has been revised to make the policy clearer to use. The changes requested have been incorporated.

Revised Recommended Change
Change ref: A_15_05 (Formerly: CSRP_15_04)

Policy CE1 - A Strong and Sustainable Economy

<table>
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<tr>
<th>Respondent</th>
<th>82550</th>
<th>Ms Beverley Doward</th>
<th>Head of Planning Northwest Regional Development Agency</th>
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<tr>
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| Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? | No |

If no, 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
1. 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 28ha 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 30 60 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, Key Delivery Items: Development of Parkside Strategic Rail Freight Interchange 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 this will need to be considered within a sub regional context in accordance with regional guidance . 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 an estimated 18% (about 1046) of the jobs could be accessed by St Helens residents. This provision has been deducted from the forecast scenario. This is because the provision of employment land outlined RSS policy W3 doesn't include Strategic Rail Freight Interchanges. Replaced "factored out" for “deducted” as agreed with JN Amend paragraph 5.12. 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 residents of St Helens. Removed references to "potential impacts on the employment land supply" and "jobs created have been factored out from the forecast scenario." As agreed with JN. Amend paragraph 15.13. If Parkside and Omega are not delivered there will be a If there is a need to identify alternative sites in order to address the B8 deficit This then there may be a need to examine the possibility of green belt release to meet demand. This would need to be assessed through a sub-regional review in accordance with regional guidance .

**Has the Response to this Representation been revised since May 2009?**

Yes

**Revised Officer Recommendation**

Partly Agree Recommend Change

**Revised Justification for Recommendation**

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 46ha following the change to the Labour Supply Local Housing Demand Variant Scenario which has been extended to 2027 by Regeneris Consulting for the Re-Publication Draft January 2011. 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 46ha 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. The policy also highlights that if sites from the green belt is needed to meet demand then this process would be carried out in a sub-regional context. In the absence of the revoked RSS and the regional apportionment of the land requirements set out in RSS policy W3, the Council will look to the Liverpool City Region Overview Study to inform this. Whilst RSS is currently re-instated the present government still aims to remove them. ii. References to Parkside have been included in the policy following discussions with 4NW who advised that the land at Parkside had been accounted for within the sub-regional employment land requirements set out in policy W3 and potentially could meet an element of the forecast demand for jobs. The policy justification also makes reference to Omega as a potential competitor that may attract B8 development that may have chosen to locate in St Helens. However, no allowances have been made for this within the Council's preferred forecast scenario.
### Policy CE1 - A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>83498</th>
<th>Jockey Club Racecourses</th>
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<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1735</td>
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**Legally Compliant?** | Yes | **Sound?** | Yes, with minor changes | **Issue raised before?** | No |

**If no, 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 be 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**

No change required.

**Has the Response to this Representation been revised since May 2009?**

Yes

**Revised Officer Recommendation**

No Change Recommended

**Revised Justification for Recommendation**

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 be 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 possible candidate "Major Developed Site in the Green Belt" to be considered during the preparation of the Allocations DPD.

**Revised Recommended Change**

No change

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### Policy CE1 - A Strong and Sustainable Economy

<table>
<thead>
<tr>
<th>Respondent</th>
<th>223810</th>
<th>Mr Jonathan Burns</th>
<th>DPP Planning Consultancy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Representation</td>
<td>CSPUB1733</td>
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<td></td>
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**Legally Compliant?** | Yes | **Sound?** | Yes, with minor changes | **Issue raised before?** | No |
If no, why not?
Draft PPS 4 was published in May 2009
Any other comments?

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 Council's 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 (as updated), 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 premises is not prejudiced and where the proposed use is fully compliant with all policies associated with that use."

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Partly Agree Recommend Change

Revised Justification for Recommendation
Policy re-worded to improve application and clarity. Disagree that employment sites are automatically suitable for leisure and retail. They remain subject to the Impact Test and Sequential Test set out in PPS4.

Revised Recommended Change
Change ref: A_15_06

Policy CE1 - A Strong and Sustainable Economy

Respondent 366518 Roseland/Oakham Developments

Representation CSPUB1755

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

If no, why not?

Any other comments?

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 Regaional 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 sub-regions employment land. 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.

Has the Response to this Representation been revised since May 2009?

Yes

Revised Officer Recommendation

No Change Recommended

Revised Justification for Recommendation

The precise boundary of the Green Belt is shown on the Proposals Map. RSS considers that there is no need for substantial strategic change to the Merseyside Green Belt before 2011. The detailed Green Belt boundary as defined by saved UDP policy S1 and shown on the Proposals Map will be maintained. Minor amendments to make the detailed Green Belt boundary more robust will be considered in the Allocations DPD. After 2011 the presumption was against any change, subject to further sub-regional studies. The approach of RSS, considering the land supply and needs of the sub-region as a whole, is still considered appropriate in order to see if needs can be met sustainably, including in neighbouring authority areas, before Green Belt land is considered. Smaller scale, non-strategic release of Green Belt may by itself be appropriate however the cumulative impact needs to be taken into account. An assessment of land supply and need in the Liverpool City Region is in progress and will inform any future Green Belt review in the medium to long term. Evidence from the Employment Land & Skills Review identifies a potential shortage of land for B8 employment uses. 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.

Revised Recommended Change

No change
Agree that the first line of Policy CH 1 should be reworded for the avoidance of doubt, to include a reference to a Map DPDs and this is reflected in the Key Delivery Items box. In addition, the St.Helens Town Centre and release of land for residential development on specific sites will be allocated through the Allocations and Proposals 2 (Town Centre), 3.1 (Newton-le-Willows & Earlestown), 4 (Haydock & Blackbrook) and 5 (Rural St.Helens). Any Council's position on density - are the national standards being applied apart from when seeking higher densities?

Paragraph 14.15 acknowledges that the current economic climate has had an impact upon the rate of completions will begin to recover in 2011 and will exceed annual requirements in the following years, which will 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 oversupply 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
April 2009 indicated total net completions in 2008/09 to be 240, against a Growth Point target of 684. The housing AAPs. Paragraph 14.15 reworded to read: "However, the recession, which commenced in 2008, will have a

Agree that the first line of Policy CH 1 should be reworded for the avoidance of doubt, to include a reference to a

Assessments (SHLAA) also followed the density approach of the Preferred Options Core Strategy when

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 (SHLAA) 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 para. 47, whilst bearing in mind local circumstances having regard to PPS3 para. 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: "2. Allocating land to meet the outstanding residual requirement for the period 2003- 2020 2021 , 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 e ncouraging 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 Town Centre 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 This 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 Item Baseline Target How Distribution of residential development 2009 Annual Monitoring Report (AMR) 72% St.Helens 20% Newton-le-Willows and Earlestown 8% Haydock and Blackbrook 3% Rural St.Helens AMR; annual Housing Land Position Statement (HLPS); and Strategic Housing Land Availability Assessment (SHLAA) The following row inserted into the Key Delivery Items table in the Delivery and Monitoring Strategy for Policy CH 1: Item Cost and funding Who Delivery Time Frame Adoption of St.Helens Town Centre and Earlestown Town Centre AAPs STHMBC Staff Time and LDF Budget STHMBC Preparation begun 2009. 2012

Has the Response to this Representation been revised since May 2009?

Yes

Revised Officer Recommendation

Partly Agree Recommend Change

Revised Justification for Recommendation

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. Similarly agree that "net" will be added to the first line of Policy CH 1 Key Delivery Items box. However, the reference to those additional dwellings proposed by the Mid Mersey Growth Point will not be incorporated into this policy, and the "Implementation of the Mid Mersey Growth Point Programme of Development" will be removed from the Key Delivery Items box, as the Growth Point 20% uplift is no longer directly related to the RSS housing figures. St.Helens’ aspiration for growth is incorporated within the housing target of 570 dwellings per annum. In addition, due to the ending of Central Government funding, the Mid Mersey Growth Point will cease to exist in its current form at the end of March 2011. In light of the delay to the anticipated date of adoption for the Core Strategy, the plan period has been extended to 2027 in line with PPS3 and PPS12, and the net housing requirement is therefore 13,680 (i.e. 570 x 24). 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. Notwithstanding this, the Council interprets the housing provision as being an annual average over a fifteen-year plan period (rather than a minimum or maximum), so any periods of undersupply or oversupply delivery could be addressed over this long-term period. 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 2010 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 2023/24 and further wording will be added to paragraphs 14.15 and 14.16 to explain this. Indeed, the bullet points within paragraph 14.16 originally 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, which will be added to this paragraph. For the avoidance of doubt, the Council will add criterion 2A to Policy CH 1 to consider how the identified shortfall at the end of the plan period (2022-2027) 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: (i) sites being released from other uses (windfall allowance); (ii) increased densities; (iii) more favourable views towards SHLAA potentially suitable sites; and (iv) the possible release of Green Belt land (provided that it is in line with work being carried out at the Merseyside Sub Regional level). However, the Council is keen to stress this should be kept flexible bearing in mind the results of the sub-regional Overview 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 and the Area Strategy Policies: CAS 1, CAS 2, CAS 3.1, CAS 4 and CAS 5. Any release of land for residential development on specific sites will be through the Allocations DPD and this is reflected in the Key Delivery Items box. In addition, Area Action Plans (AAPs) such as the St.Helens Central Spatial Area and Earlestown Town Centre 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, particularly in light of the revision to PPS3 in June 2010, which removed the national indicative minimum density of 30 dwellings per hectare (dph). 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 dph, except in very special circumstances (criterion vi); set a minimum density of between 30-40 dph and encourage higher densities in appropriate locations (criterion vii); and safeguard the character of established residential areas. The methodology of each SHLAA also followed the density approach of the Preferred Options Core Strategy when assessing the potential capacity of suitable sites. Therefore it is proposed that Policy CH 1 criterion 6 will be re-worded to match similar wording from the Preferred Options Core Strategy Policy CH 1 criterion vi. This will help to clarify that the Council is applying a minimum density of 30 dph, 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.

Revised Recommended Change
See changes ref: A_14_01 & 07 & 26 & 27; A_App1_02 & 16; A_14_03 & 05.

Policy CH 1 - Meeting St. Helens' Housing Requirement

| Respondent | 167432 | Mr Simon Artiss Planning Manager Bellway Homes Ltd |
| Legally Compliant? | Yes | Sound? | Yes, with minor changes |
| Issue raised before? | No | If no, 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
Management DPD may also allow economic viability to be taken into consideration when it sets out other planning
agrees to ensure that the duplication of other powers/ statute is avoided wherever possible. With reference to
existing settlement areas, with the majority being located on PDL and it is argued that this does not constitute a
material change.

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. 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. 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.

No Change Recommended

No Change

No Change Recommended

No Change

No Change Recommended

No Change

No Change

No Change Recommended

No Change

No Change Recommended
its existing settlement areas, with the majority being located on PDL and it is argued that this does not constitute a material change.

Revised Recommended Change
No Change

Policy CH 2 - Meeting St. Helens' Housing Needs

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

Representation CSPUB356

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

If no, 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 para 29 of PPS3

Council View
Partly 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 para. 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."

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Agree Recommend Change

Revised Justification for Recommendation
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 14.22B.

Revised Recommended Change
Change ref: A_14_37 (Formerly: CSRP_14_28)

Policy CP 2 - Creating an Accessible St. Helens

Respondent 82085 Ms Victoria Ridehaugh LDF Manager Highways Agency

Representation CSPUB1840

Legally Compliant? Sound? Issue raised

Revised Recommended Change
No Change
Before?

If no, 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 agrees 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 s S trategic road Route n N etwork 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 Road 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. "

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Partly Agree Recommend Change

Revised Justification for Recommendation
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 agrees 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.

Revised Recommended Change
See Change ref: A_13_05

Policy CR 1 - Minerals

Respondent 316561 Miss Rachael Bust Deputy Head of Planning and Local
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.

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 MSAs 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.

Has the Response to this Representation been revised since May 2009?

Yes

Revised Officer Recommendation

Agree Recommend Change

Revised Justification for Recommendation

The two MSAs have been deleted. MSAs will now be designated through the Allocations DPD

Revised Recommended Change

Change ref: A_17_09
Legally Compliant?  Yes  Sound?  No  Issue raised before?  Yes

If no, why not?

Any other comments?

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 CAS3.2seem 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 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 1 (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"

Has the Response to this Representation been revised since May 2009?
Yes

Revised Officer Recommendation
Partly Agree Recommend Change

Revised Justification for Recommendation
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.
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### Policy CSS 1 - Overall Spatial Strategy

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<tr>
<th>Respondent</th>
<th>The Director</th>
<th>Church Commissioners for England</th>
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### Legally Compliant? | Yes | Sound? | Yes, with minor changes | Issue raised before? |

**If no, 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 SHLAAAs". 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

**Has the Response to this Representation been revised since May 2009?**

Yes

### Revised Officer Recommendation

No Change Recommended

### Revised Justification for Recommendation

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 out this approach, which is also mentioned in paragraph 14.16. 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.
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.

Revised Recommended Change
See Change ref: A_06_12
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**Contact Centre**  
Wesley House, Corporation Street  
St. Helens, Merseyside, WA10 1HF  
**Tel:** (01744) 676789  
**Minicom:** (01744) 671671  
**Fax:** (01744) 676895  
**Email:** contactcentre@sthelens.gov.uk  
www.sthelens.gov.uk