



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

**COPIES OF REGULATION 20
REPRESENTATIONS (REGULATION 22 (1) (D))
DOCUMENT**

PLAN ORDER

PO0101 – PO0300

SEPTEMBER 2020

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PO0101



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS.

First Name: CHRISTINE

Last Name: DONNELLY

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 7.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**
post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Where are all these extra cars on our already crowded roads going to go, it's already chaos, especially at school time. St. Helens isn't the town it once was, it is no longer thriving, we don't need all these extra homes. Look at the chaos at the Millfields development, a lovely community spoiled and an accident waiting to happen. If Brexit goes as expected we will need our agricultural land more than ever.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0102

13 MAR 2019

Ref: LPSD

(For official use only)



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PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>DEBORAH</u>	First name: _____
Last Name: <u>SIMPSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>45 LAUREL DRIVE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 5JB</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>07.03.19.</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<ul style="list-style-type: none"> • THE PLAN MAKES NO REFERENCE TO PREVIOUSLY DEVELOPED LAND (PDL) THAT IS NOT (YET) AVAILABLE OR INCLUDED ON THE BROWNFIELD REGISTER • THE COUNCIL IS USING AN OLDER FORECAST FOR THE NUMBER OF HOUSES REQUIRED. 486 (2014) AS CONTRASTED WITH THE LOWER 2016 PREDICTION (ONS) OF 383. • THE INCREASE IN TRAFFIC PROPOSED IN THE PLAN WILL HAVE A SIGNIFICANT IMPACT ON AIR QUALITY, NOISE AND GENERAL HEALTH 	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

REMOVAL OF THE TWO GREEN BELT SITES OF 56.6ha AND 148ha FROM SAFEGUARDED STATUS AND DECONTAMINATION OF PART OF THE 3,170 ha OF LOWEST PRIORITY CONTAMINATED LAND SITES WOULD MAKE THE LOCAL PLAN COMPLIANT AND SOUND. NOTE: THIS WOULD ONLY REQUIRE 7% OF 3,170ha LPC LAND

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0103



St. Helens
Council

648

13 MAR 2019

Ref: LPSD

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: THOMAS	First name:
Last Name: MORRISON.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 CRAWFORD CLOSE, CLOCK FACE	Address:
Postcode: WA9 4XJ.	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

13 / 3 / 19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I am part of the Bold and Clock Face action group and I supporting their recommendations

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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PO0104

13 MAR 2019

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>NORAH</u>	First name: _____
Last Name: <u>HALL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>29 FIELD ROAD</u>	Address: _____
<u>CLACK FARM</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA9 4QN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>11/3/19</u>
------------------	----------------------

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☐ Yes (via email)

☐ No

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
<p>My views are in line with BOLD AND CLOCK FACE ACTION GROUP.</p>

Please continue on a separate sheet if necessary

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

Yes, I wish to participate at the oral examination

1800756M

PO0105



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: COLETTE

Last Name: HALL

Organisation/company: _____

Address: 10 CRAWFORD STREET

CLOCKFACE ST. HELENS

Postcode: WA9 4XQ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 01/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

MY VIEWS ARE IN LINE WITH BOLD AND CLOCK
ACTION (C) FACE 1 GROUP.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0106



St.Helens
Council

651

13 MAR 2019

Ref: LPSD

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Ben	First name:
Last Name: Gerrard	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: 56 Crawford Street	Address:
Postcode: WA9 4XH	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature

[REDACTED]

Date:

21/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I agree ^{with} Bold and Clock face action group policy / statement

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination
--------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.**

PO0107



St.Helens
Council

654

13 MAR 2019

Ref: LPSD

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MICHELLE	First name:
Last Name: RIGBY	Last Name:
Organisation/company:	Organisation/company:
Address: 16 HALL STREET, CLOCK FACE, ST. HELENS, Postcode: WA9 4XN	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

12-03-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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RETURN DETAILS

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post to:

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St.Helens Council
Town Hall
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St.Helens
Merseyside
WA10 1HP**

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PART B – YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The decision has been made in December 2018 with no notifications to any of the houses in the area. There where no information about these developments, advertised on any lamp posts or leaflets, to inform us of the plans. Apparently we have been informed that labour councillors voted for the decision of development, with the public consultation.

Please continue on a separate sheet if necessary

I am in agreement with the Bold & Clock Face Action Group.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination
--------------------------	--	--------------------------	--

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PO0108



St.Helens
Council

738

13 MAR 2019

Ref: LPSD

(For official use only)

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This form has two parts;

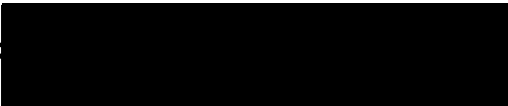
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>THOMAS WILLIAM</i>	First name:
Last Name: <i>BARTON.</i>	Last Name:
Organisation/company: <i>NONE</i>	Organisation/company:
Address: <i>22, CRAWFORD ST. CHOCKFACE. STHELENS</i>	Address:
Postcode: <i>WA9 4XP</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>12-03-19</i>
--	-----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

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St.Helens
Merseyside
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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map	✓ ✓ ↓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	✓
Other documents (please name document and relevant part/section)				Housing Allocation					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/> NO
Justified?	<input checked="" type="checkbox"/> NO
Effective?	<input checked="" type="checkbox"/> NO
Consistent with National Policy?	<input checked="" type="checkbox"/> NO

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

WE HAVE HAD NO NOTIFICATION WHATSOEVER
NOIFICATION.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

BECAUSE WE HAVE NOT BEEN TOLD UP
TO THIS, AND NEED TO RECTIFY THIS

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0109



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANN</u>	First name: _____
Last Name: <u>NEWTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>40 blackbrook Rd</u>	Address: _____
<u>BLACKBROOK ST. HELENS</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA11 9PU</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>12-3-19</u>
------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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or by email to:

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NEXT STEPS

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Building in this area will be detrimental to the environment. Windle Island is a very busy road junction and further building would increase the traffic flow. Further pressure would be put on local schools, hospitals etc., which are under great pressure already. I am a keen ramble and building here would restrict my using the area to walk, bird watch and absorb the rest of what nature has to offer. Therefore, I strongly object to using this land to build on.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Please keep a copy for future reference.

PO0110



St. Helens
Council

747

13 MAR 2019

Ref: LPSD

(For official use only)

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Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUSAN	First name:
Last Name: BLACK	Last Name:
Organisation/company: ✓	Organisation/company:
Address: 6 THAKWOOD MESS RAINFORD	Address:
Postcode: WARR 8QL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

13. / 3. / 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
	Am		Am				Am		Am
Other documents (please name document and relevant part/section)				Object to all policies!!					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Infrastructure 259 dwellings 500 houses
 Cars / Traffic impact Perhaps Village - fuel
 Flooding impact School impact
 Noise pollution / HABITAT.
 Doctors / Dentists Grade 1 Agriculture
 Green belt. 6000 loss of production which
 Gorp Khan Brown field for Brexit takes
 loss of green wood

Please continue on a separate sheet if necessary

2035
 2035

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

THIS IS BE NECESSARY.

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PO0111



St.Helens
Council

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>DIANE</u>	First name: _____
Last Name: <u>EDWARDS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>33 SEDDON CLOSE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST MULLINS</u>	_____
Postcode: <u>WA10 5AJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:	Date: <u>12-3-19</u>
------------	----------------------

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☐ Yes (via email)

☒ No

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Victoria Square
St Helens
WA10 1HP**

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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

<p>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</p> <p>Please read the Guidance note for explanations of the Tests of Soundness</p>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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PO0112

① LPA05 ③ GEN 761
② LPA04 ④ Green Belt Review 2018

13 MAR 2019

Ref: LPSD

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St.Helens
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Title: <u>MRS</u>	Title:
First Name: <u>LARRY</u>	First name:
Last Name: <u>COOPER</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>421, CLOCKFACE ROAD</u>	Address:
<u>CLOCKFACE, ST HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>WA9 4QL</u>	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <u>13th March 2019</u>
-----------------------	------------------------------

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Other documents (please name document and relevant part/section)							

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--

AS PER THE SUPPORTING DOCUMENT

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and SHA on behalf of Bold and Clock Face Action Group.

I trust this document will be submitted, in its entirety as part of the public consultation.

Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below (taken from St Helen's SCI 2013 pages 7 and 13 respectively). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document (DPD)' (Reg.18) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks (Reg. 19). The majority of constituents that live within the

200m area surrounding 4HA and 5HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

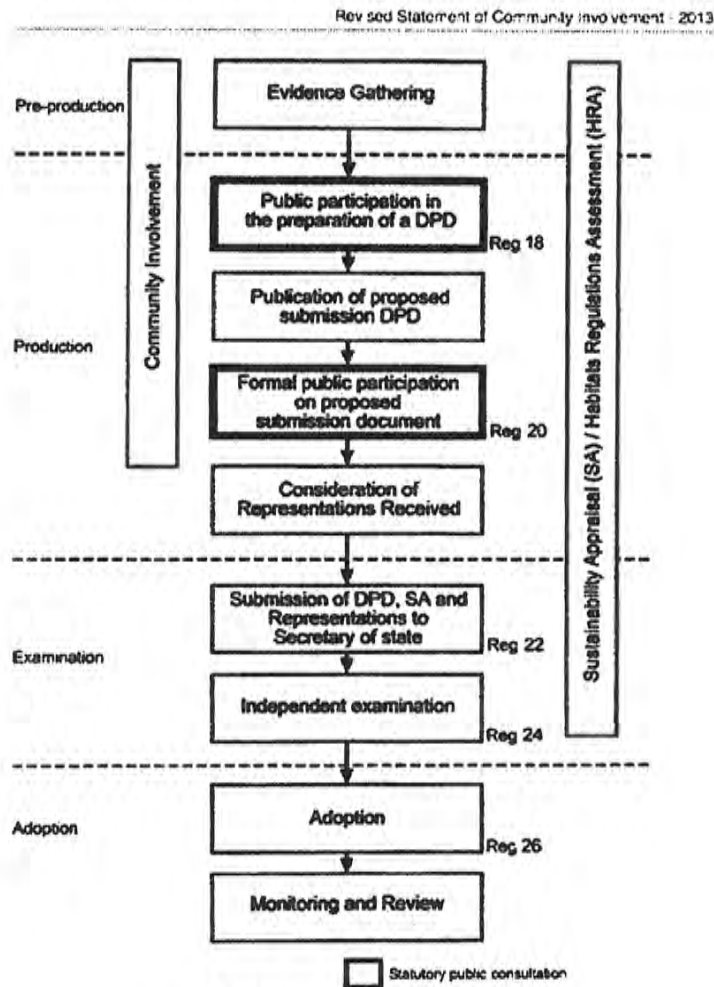


Figure 3: Stages in the Preparation of Development Planning Documents

	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	•		•				
Individual Consultation Letter/email		•		•	✓	•	•
Publication in Community Magazine	•	•	•	•			
Publication on Website		•	•	•		•	•
Public Notice or press release		•		•			
Deposit in Public Buildings ⁶		•	•	•	✓	•	
Presentation offered to business and community groups		•	•	•			
Consultation Letter/email to interest groups	•	•	•	•		•	
Articles in Specialist Publications		•		•			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

Soundness

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. The National Planning Policy Framework (NPPF) (2019) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. Nor is the plan consistent with National Policy in relation to this issue; NPPF (2019) paragraph 137 requires

PO0113



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Council

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1. Your Details

(we will correspond via your agent)

Title: MR

First Name: PAUL

Last Name: COOPER

Organisation/company: _____

Address: 421 CLOCK FACE ROAD

CLOCK FACE

ST. HELENS

Postcode: WA9 4QL

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature _____

Date: 13th MARCH 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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WA10 1HP**

or by hand delivery to:

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St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	✓ LPA02, 03 & 05	Paragraph/ diagram table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

As Per the supporting document

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per the supporting document-

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSP Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb) and SHA on behalf of Bold and Clock Face Action Group.

I trust this document will be submitted, in its entirety as part of the public consultation.

Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035

As part of the Council's adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23rd January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6th March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23rd January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below (taken from St Helen's SCI 2013 pages 7 and 13 respectively). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document (DPD)' (Reg.18) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks (Reg. 19). The majority of constituents that live within the

200m area surrounding 4HA and 5HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

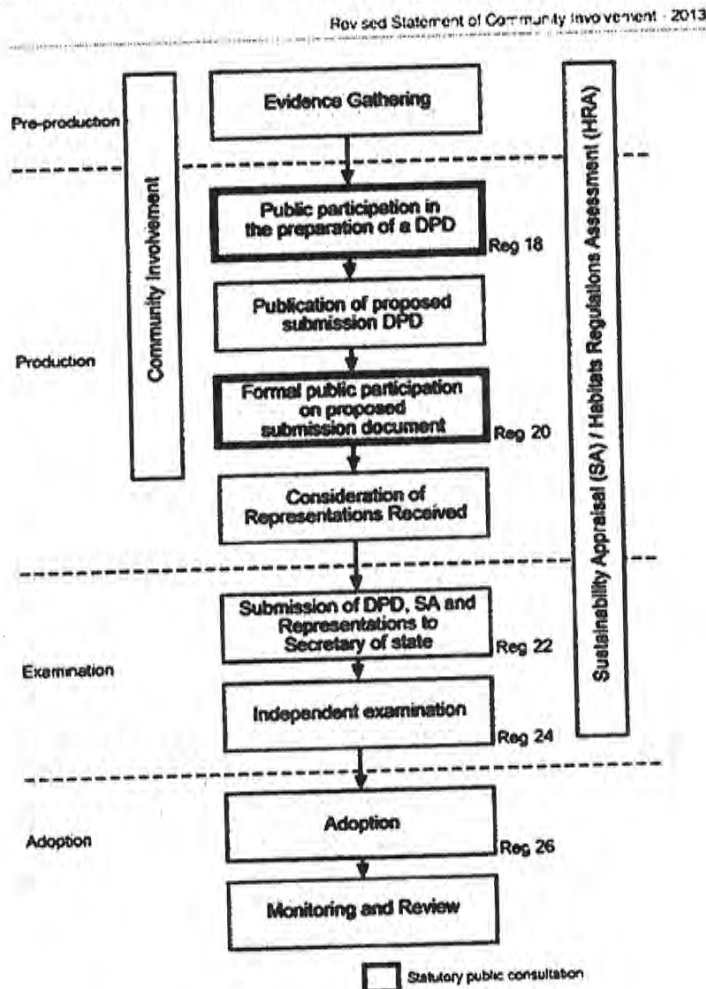


Figure 3.1 Stages in the Preparation of Development Planning Documents

3

	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	•		•				
Individual Consultation Letter/email		•		•	✓	•	•
Publication in Community Magazine	•	•	•	•			
Publication on Website		•	•	•		•	•
Public Notice or press release		•		•			
Deposit in Public Buildings ^a		•	•	•	✓	•	
Presentation offered to business and community groups		•	•	•			
Consultation Letter/email to interest groups	•	•	•	•		•	
Articles in Specialist Publications		•		•			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

Soundness

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. The National Planning Policy Framework (NPPF) (2019) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. Nor is the plan consistent with National Policy in relation to this issue; NPPF (2019) paragraph 137 requires

PO0114



St. Helens
Council

767

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14, ROSE PLACE RAINFORD ST HELENS	Address:
Postcode: WA 11 8QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 9/3/2019
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☒ (Via Email)

No ☐

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				1 OBJECT TO ALL POLICIES -			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is <u>not</u> ... Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

BROWNFIELD FIRST POLICY? BHA IS GRADE 1 FARMLAND, BUILDING HERE WILL IMPACT FARMERS AND THEIR EMPLOYEES LIVELIHOODS. THERE ARE MANY BROWNFIELD SITES IN ST HELENS. FLOODING IS ALREADY A PROBLEM, WATER THAT SETTLES ON THIS FIELD WOULD BE FORCED FURTHER DOWN TO PASTURE LANE / CHURCH RD.

BUILDING THESE HOUSES WOULD LEAD TO A HUGE INCREASE IN TRAFFIC CREATING AIR AND NOISE POLLUTION AND ADDING TO CONGESTION ON THE ROADS AND INCREASING ALREADY DIFFICULT PARKING.

SCHOOLS AND DOCTORS ARE ALREADY DIFFICULT TO GET A PLACE / APPOINTMENT.

Please continue on a separate sheet if necessary

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PO0115

13 MAR 2019

Ref: LPSD

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St. Helens
Council

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>ROSSETTA</u>	First name: _____
Last Name: <u>CRAWFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>9, ROSK PLACE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA11 8QG</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>12-3-19</u>
------------------------------	----------------------

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☒ Yes (via email)

☐ No

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Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>GRADE 1 FARM LAND SHOULD NOT BE USED, BROWNFIELD FIRST? MOSS NOOK URBAN VILLAGE ALREADY HAS PLANNING PERMISSION ALONG WITH MANY OTHER BROWNFIELD SITES.</p> <p>FLOODING IS ALREADY A PROBLEM ON HIGHER LANE AND BHA, IF BUILT ON SURELY THIS WATER WILL FIND ITS WAY TO THE LOWER LYING CHURCH RD/ PASTURE LANE AREAS.</p> <p>THE HUGE INCREASE IN TRAFFIC WILL RESULT IN CONGESTION, AIR & NOISE POLLUTION ALSO SCHOOLS & DOCTORS ARE ALREADY OVERLOADED & PARKING IN THE VILLAGE IS ALREADY DIFFICULT.</p>

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PO0116



St. Helens
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769

13 MAR 2019

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First Name: IAN	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ROSE PLACE RAINFORD ST HELENS	Address:
Postcode: WA11 8QG	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date:

9/3/19

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LIVELIHOODS.
FLOODING IS ALREADY A PROBLEM ON SHA & HIGHER LANE
BUILDING WILL TRANSFER THE WATER TO THE LOWER
LYING AREAS I.E. PASTURE LANE / CHURCH ROAD.
259 HOUSES WILL LEAD TO A HUGE TRAFFIC INCREASE
AND THE ASSOCIATED AIR/ NOISE POLLUTION.
THE PRESENT ROADS, SCHOOLS, DOCTORS, PARKING WILL
NOT COPE WITH BUILDING OF THIS SCALE

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0117



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>CRAWFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>9 ROSE PLACE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>ST HELENS MERSEYSIDE</u>	_____
Postcode: <u>WA11 8QG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12/3/19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

Ground Floor Reception
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(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				I OBJECT To ALL Policies					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is <u>not</u> :	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>BROWFIELD FIRST NOT GRADE 1 FARMLAND AFFECTING LIVELEHOODS. FLOODING IS ALREADY A PROBLEM ON BWA AND ABOVE BUILDING WILL TRANSFER THIS TO LOWER LYING LAND. A MASSIVE INCREASE IN TRAFFIC WITH THE ASSOCIATED POLLUTION AND DANGER ON ALREADY VERY BUSY ROADS. SCHOOLS, DOCTORS ARE ALREADY OVERSUBSCRIBED. IS THERE A REAL NEED FOR THIS HOUSING IN A TOWN WHERE THE POPULATION HAS BEEN REDUCING FOR YEARS?</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.

PO0118



St Helens
Council

771

13 MAR 2019

Ref: LPSD

(For official use only)

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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: PATRICIA	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ROSE PLACE RAINFORD ST HELENS WALL BRG	Address:
Postcode:	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 9/3/19
-----------------------	--------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email) No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

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St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

**Please use a separate copy of Part B for each
separate comment/representation.**

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				I OBJECT TO ALL POLICIES.					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

8HA IS GRADE 1 FARMLAND, BUILDING HERE WILL IMPACT FARMERS AND THEIR EMPLOYEES.
BROWNFIELD FIRST E.G. MOSS NOOK URBAN VILLAGE HAS HAD PLANNING PERMISSION FOR MANY YEARS AND WOULD HELP PROVIDE THE HOUSES NEEDED.
FLOODING IS ALREADY A PROBLEM ON THIS FIELD, BUILDING WOULD CAUSE PROBLEMS TO THE LOWER LYING AREAS OF PASTURE LANE AND CHURCH RD.
THIS PLAN WOULD LEAD TO A HUGE TRAFFIC INCREASE CREATING AIR & NOISE POLLUTION.
THE INFRASTRUCTURE OF RAINFORD IN TERMS OF ROADS, SCHOOLS, DOCTORS, PARKING ETC WOULD NOT BE ABLE TO COPE WITH A DEVELOPEMENT OF THIS SCALE.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ No, I do not wish to participate at the oral examination

☐ Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0119



St. Helens
Council

775

13 MAR 2019

Ref: LPSD

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Part A – Personal Details
Part B – Your Representation(s).

- ① LPA02
- ② PARA 1.7.2 DEC
- ③ LPA04
- ④ GENERAL
- ⑤ IDP
- ⑥ LPA08

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: SRENTA	First name:
Last Name: WORRALL	Last Name:
Organisation/company:	Organisation/company:
Address: 10, CALDERHURST DRIVE WINDLE.	Address:
Postcode: WA10 6ED	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

28/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

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St.Helens Council
Town Hall
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St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

**Please use a separate copy of Part B for each
separate comment/representation.**

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See attached sheet

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines and are extremely aspirational, ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

The Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meetings stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the following matters:

Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

Traffic Issues and Duty to Cooperate

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. The plans also show a planned route for walkers and cyclist along Calderhurst Road to Bleak Hill road where there is a traffic problem with school parking. I fear that these plans will be altered to allow access/egress for the new home residents.

PO0120

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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- ② LPA04
- ③ GENERAL
- ④ IDP
- ⑤ LPA08

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>EVERYN</u>	First name: _____
Last Name: <u>DODD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 NICOLL ROAD</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST HELENS LANCES WA10 5LW</u>	_____
Postcode: _____	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12.3.2019</u>
------------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes ?	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>DOES NOT COMPLY WITH NPPF (2018) GUIDELINES</p> <p>DOES NOT EXPLAIN HOW THE ROAD INFRASTRUCTURE PROBLEMS WILL BE OVERCOME</p> <p>ALL FORECASTS ARE HIGHLY ASPIRATIONAL AND NOT EVIDENCED BY HARD FACTS —</p> <p>SEE ATTACHED SHEET FOR MORE DETAILS</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CLARIFICATION IS NEEDED ON THE NPPF METHOD OF CALCULATING HOUSING NUMBERS (2016 OR 2018) UNTIL THIS HIGHLY ASPIRATIONAL^{METHOD} IS MODIFIED ON A REGIONAL AND NOT NATIONAL BASIS - NO FURTHER PROGRESS SHOULD BE MADE.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Dear Sirs

This continuation sheet is further to my Representation/Comment form.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines, are extremely aspirational, and ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement. ①

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land. ②

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not. ③

Traffic Issues and Duty to Cooperate: St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private car to the new business estates, mainly along the A580 as there is no existing public transport nor any published plans for the future. The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6. ①

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. ✓

Windle Island: The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool. ④

? WEST
LANCS LP?

PO0121

Ref: LPSD
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

- ① PAR 1.7-2
- ② LPA02
- ③ LPA04
- ④ CEN 001
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>IRENE</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK CREB</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED] Date: 13.3.2019

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email) ☐ No

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WA10 1HP**

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO DEVELOPMENT ON GREENBELT UNTIL ALL BROWNFIELD
SITES ARE USED - NO DEVELOPMENT ON GREENBELT
(BHS) UNTIL ROAD INFRASTRUCTURE FIXED -

SEE ATTACHED SHEET

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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at the oral examination

Yes, I wish to participate at the oral
examination

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If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. **For this reason I believe that the plan has not been positively prepared.**

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

Brownfield sites

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

Traffic Issues

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

PO0122

PFOG 14
SME 8HS

778

13 MAR 2019

Ref: LPSD

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- ② LPA02
- ③ LPA04
- ④ GENERAL
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK PASS</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>13-3-2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not Sound - SEE ATTACHED</p>
--

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO BUILDING SHOULD TAKE PLACE UNTIL
HIGHWAY INFRASTRUCTURE IS IN PLACE —
SEE ATTACHED

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons:

I believe that the Plan is not legally compliant because:

As late as 12th December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy.

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

No statement is available on how the Council has fulfilled its Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere.

Duty to Cooperate.

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government).

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved.

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PO0123

13 MAR 2019

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Title: <u>MRS</u>	Title: _____
First Name: <u>GAIL</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>91, WINDLE GROVE</u>	Address: _____
Postcode: <u>ST. HELENS WA10 6HP</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12/03/2019</u>
------------------	-------------------------

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☐ Yes (via email)

☐ No

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> NO the plan is based on flawed methodology
Effective?	<input type="checkbox"/> NO - plan not deliverable
Consistent with National Policy?	<input type="checkbox"/> NO - it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The requirement for Sustainable development based on flawed data. Housing Need assessment does not use standard Methodology. Over estimation of housing needs, Council are using older forecast (2014) of 426 per year instead of (2016) ONS of 383 houses per year Borough has significant traffic problems, Windle Island, Bleak Hill Rd.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan needs to be modified and concentrate on brownfield development, on 70% of the 3,170-ha available brownfield would be needed. This is lowest priority contaminated brownfield land, so cost of de-contamination would not be great. The cost of infrastructure, widening Houghton Lane traffic island, would be far more expensive. Bleak Hill Rd, would also be taking far more traffic, there is no mention of local and borough wide road improvements. The plan promotes unsustainable traffic growth causing traffic issues that will not satisfy the NPPF (2016)

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

• Gail Twist, 91, Windle Grove WA106HP

The increase in traffic proposed in the plan will have a significant impact on air quality and general health. As a mother of three children who attend Black Hill and Raurkrol High schools I am extremely worried about the long term implications on my children's health and safety.

The IDP fails to explain the impact on Healthcare and Education. There is no indication or reference to collaborate with the Hospital Trust, local CCs or educational authorities.

The impact on our Hospitals and social services, which are already overstretched, will be immense.

We all need green spaces for our well being, both physical and mental health. This plan does not take any of these matters into consideration.

PO0124

7915

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN PHILIP</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32, ECCLESFIELD RD</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA 10 5NB</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>12th March 2019</u>
------------------------------	------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

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St.Helens Council
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Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology.
Effective?	<input type="checkbox"/> No plan underpinned
Consistent with National Policy?	<input type="checkbox"/> No. It does not comply with NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<ol style="list-style-type: none"> 1. This plan does not satisfy requirement for sustainable development. 2. The plan promotes increased car dependency. Poor bus service or no train service 3. Sustainable housing targets proposed are based on aspirational growth predictions. 4. Plan concentrates on green space development over town centre development. With higher densities. 5. Food security by ignoring agricultural land quality. 	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan makes no mention of Brown Field use.
Only 7% of the 3170/HA Brown Field would need to be decontaminated to save the Green Belt.
The loss of grade 1 and 2 agricultural land, that comprises of most allocated and safeguarded sites is not mentioned. This will have a negative impact on farming and distribution jobs, at a time Britain needs to grow more food.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1.
John Philip Twist
32, Ecclesfield Rd, WA10 5NB.

Increased traffic in Ecclestone and Windle will have a significant impact on air quality and health in general. It has been medically proven that poor air quality causes asthma and other respiratory problems. The infrastructure of Ecclestone and Windle was not designed for the proposed increase in traffic.

The environment will significantly effect the habitat of wild life. This includes hares, foxs and in particular several species of birds, which includes birds of prey like the kestrel. The kestrel has a nest in Ecclesfield Rd.

PO0125



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Ann</u>	First name: _____
Last Name: <u>Twist</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32, ECCLESFIELD RD</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA105NB</u>	Postcode: _____
Tel No: <u>01744 630857</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12th March 2019</u>
------------------	---

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No - plan undeliverable
Consistent with National Policy?	<input type="checkbox"/> No - it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>1. Does not satisfy requirement for Sustainable development.</p> <p>2. Plan promotes increased car dependency, poor bus service, or no train service.</p> <p>3. Sustainable housing, targets proposed are based on aspirational growth predictions</p> <p>4. Plan concentrates on Green Space development over town centre development with higher densities</p> <p>5. food security by ignoring Agricultural Land Quality</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan makes no mention of brownfield use. Only 7% of the 3,170-ha brownfield would need to be decontaminated, to save the Green Belt.

The loss of Grade 1 and 2 Agricultural land, that comprises of most allocated and safeguarded sites is not mentioned. This will have a negative impact on farming & distribution jobs. At time Britain needs to grow more food.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Ann Twist 32, Ecclestone RD
WA10 5NB.

The increase in traffic in Ecclestone and Windle will have a significant impact on air-quality and general health. It has been medically proven that poor quality causes asthma, and other respiratory problems.

The Infrastructure of Ecclestone and Windle are not designed for the proposed increase in traffic. As a grandmother I am very concerned about the increase in traffic near primary schools also the fact Rainfact High pupils have to cross very busy roads to get their school bus.

This plan promotes unsustainable growth causing severe traffic issues that will not satisfy the NPPF (2016).

PO0126

13 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>91, WINDLE GROVE</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA10 6HP</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>12th March 2019</u>
------------------------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> NO, the plan is based on
Effective?	<input type="checkbox"/> flawed methodology
Consistent with National Policy?	<input type="checkbox"/> plan not deliverable
	<input checked="" type="checkbox"/> No does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Does not satisfy:</p> <ul style="list-style-type: none"> Requirements for sustainable transport, plan promotes increased car dependency. Sustainable housing targets proposed are based on aspirational employment growth predictions. Concentrating on Green Space development over town centre development with higher densities. Food security by ignoring Agricultural land Quality.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I am very concerned about, unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). The increased traffic will have a severe impact on air quality. I am very worried about the impact on children, mine included, who attend the local schools, roads passing the schools will increase with traffic. Houghtons Lane was never envisaged for the heavy traffic that will increase if this proposal is accepted. Healthcare and Education is not explained in the IOP, how this will be managed or funded.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0127



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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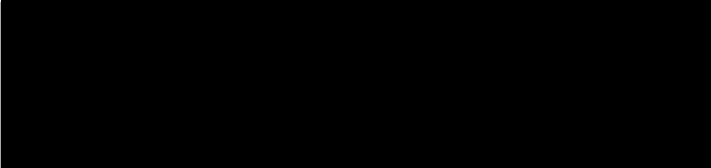
This form has two parts;

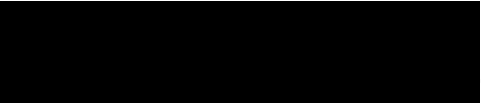
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DOUGLAS</u>	First name: _____
Last Name: <u>GENT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>33 GURVAN RESCENT</u> <u>GARSWOOD, WIGAN</u>	Address: _____
Postcode: <u>WN4 0SS</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>7/3/2019</u>
--	-----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

<p>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</p> <p>Please read the Guidance note for explanations of the Tests of Soundness</p>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

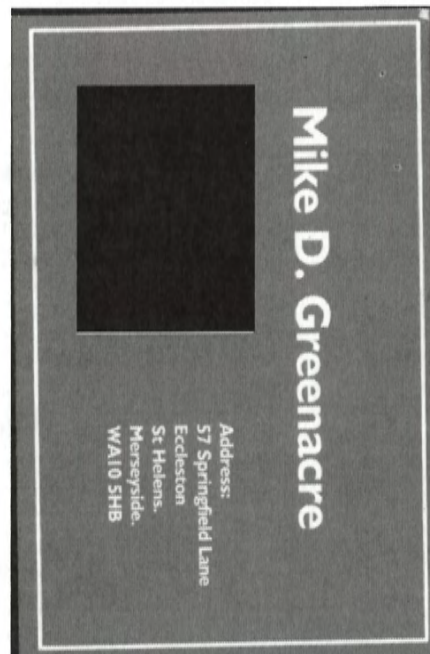
Please keep a copy for future reference.

PO0128

- ① - LPA04
- ② - LPA05
- ③ - LPA06

- ④ - Para 17.2 DFC
- ⑤ - GEN
- ⑥ - IDP

PF0773





St. Helens
Council

838 13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

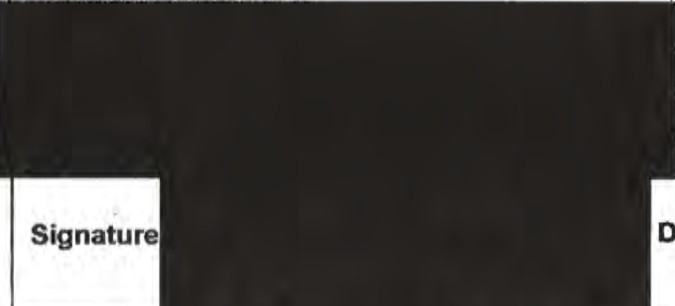
Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Michael	First name:
Last Name: Greenacre	Last Name:
Organisation/company:	Organisation/company:
Address: 57, Springfield Lane, Eccleston, St Helens. Merseyside	Address:
Postcode: WA10 5HB	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature	Date: 12 th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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PLEASE SEE ATTACHED SUBMISSION

Please continue on a separate sheet if necessary

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<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination

--	--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

FROM M D GREENACRE

57 Springfield Lane,
Eccleston,
St Helens.
Merseyside
WA10 5HB

12th March 2019

ST HELENS BOROUGH LOCAL PLAN 2020-2035.
RESIDENT REPRESENTATION REPONSE

To whom it may concern,

I am a resident of Eccleston [REDACTED]

Since the issue of the original St Helens plan in December 2016 I have been heavily involved in supporting Eccleston Community Residents Association, ECRA {ecra.org} in its campaign against the unnecessary plans by the Council to reclaim large swathes of Green Belt land across the Borough, particularly affecting Eccleston, primarily for housing development.

I am aware that a number of very detailed and extensive representation documents have been submitted from ECRA. These documents have a significant amount of facts and figures and DATA so I do not intend to replicate all of that but only use certain key statistics to emphasise a point where necessary. The 3 submissions relate to an overall response document supported by a submission on the Economy and a submission on the impact relating to the demographic status within the borough. I fully support their content

In the following pages I will layout my own reasons for opposing the revised

ST HELENS LOCAL PLAN SUBMISSION DRAFT {LPSD}

In doing so I would wish to make it clear that I fully support the need for St Helens to develop an overall plan for the town which has seen a long period of decline in skilled jobs primarily brought about by the significant withdrawal from coal mining and glass production over a number of years past.

However I strongly oppose the revised plan, which is based on wildly optimistic forecasts for employment and jobs, thus predicting dramatic forecasts for increased population and therefore creating false demand for excessive new housing requirements forming a key part of this revised plan. ①
②

- The plan does not make clear that the "Safeguarded" land is not allocated for development at the present time. Planning permission for the permanent development of "Safeguarded" land should only be granted following an update to a plan which proposes the development.

Taking account of these points and to re-emphasise I cannot understand why there is a need at least until the first review, to have land removed from GB status to being 'Safeguarded'.

INFRASTRUCTURE CONCERNS

Whilst the core targets of the LPSD relate to significant housing and commercial land development – Higher employment requiring more workers needing more houses – there are many other areas of concern particularly around infrastructure needs and policy that I believe have not been given enough thought but in any current consideration where they have been mentioned are based on the grossly exaggerated targets for population growth.

Transport and Travel – I have significant concerns about vehicle numbers and traffic in general and that's before this plan may be approved. With the LPSD 2019 using a housing target of 486 new homes per year over the 15 years we end up with 7290 new homes. That could generate additional cars of some 9000 more by 2035 and that's being conservative. To handle such an increase in traffic requires major road network strategy but there is little in the LPSD to suggest this has been given real consideration

Residential and Commercial Traffic

In this section its inclusion relates to the impact that will be felt in residential locations such as Eccleston and not to the plan itself.

The first impact is based on the growth predictions for the Super Port of Liverpool and whilst this can only be good for employment and the Liverpool economy it will result in a massive increase in freightliner traffic along the corridors of the M62 and A580 East Lancs road servicing new Warehouse and Distribution developments as well as being the gateway to the rest of the UK. This will be compounded at the Haydock junction with the M6, already a bottleneck

Clearly the location of St Helens is an advantage for any growth in business primarily Warehouse and Distribution but as previously mentioned the plans are too ambitious for the reasons outlined earlier in this document. However working on the current LPSD my points

PO0129

856

Ref: LPSD
 15 MAR 2019
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>FREDIA</u>	First name: _____
Last Name: <u>HEWITT</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>6 DOUGLAS AVE</u>	Address: _____
<u>BOLD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>MERSEYSIDE</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 13-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email) ☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

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Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE COUNCIL HASNT THOUGHT ABOUT THE TRAFFIC WHICH WOULD BE AT LEAST 3000 MORE CARS SCHOOLS DOCTORS WHICH IS VERY HARD TO GET AN APPOINTMENT NOW THERE IS LOTS OF WILDLIFE ROUND HERE THAT WILL DISSAPPEAR SEEMS AS THOUGH THEY ARE ONLY INTERESTED IN MAKING MONEY FOR THE COUNCIL AND ARE NOT INTERESTED IN THE PEOPLE THAT LIVE IN THIS AREA</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

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PO0130

15 MAR 2019

(For official use only)

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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PART A - YOUR DETAILS

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>GEORGE</u>	First name: _____
Last Name: <u>WITT</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>6 DOUGLAS AVE,</u> <u>BOND ST. HELENS</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>13 MAR 19</u>
------------------	------------------------

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☐ No

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St.Helens Council
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Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

[REDACTED] WHERE WE WERE SURROUNDED BY GREEN BELT COUNTRYSIDE (GREEN BELT) THEN IN APPROX 1954/55 THE COUNCIL GAVE PERMISSION TO BUILD A POWER STATION IN OUR "BACK GARDEN" IN GREEN BELT LAND, WHEN WE SHOWED OUR DISAGREEMENT HE WERE TOLD THAT "IF OR WHEN THE POWER STATION CLOSED" THE LAND WOULD REVERT BACK TO FARMING - WHAT HAPPENED 600 HOUSES BUILT THERE AGAIN IN "GREEN BELT LAND"

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THIS EXAMINATION WILL NOT IN ANY WAY HELP THE RESIDENTS OF BOLD SUTTON, ON CROOK FACE. MY BELIEF IS 'ONCE THE COUNCIL MAKE UP THEIR MINDS THATS IT. I WOULD LIKE TO ADD I BET THESE SCARED COUNTELDOWN WOULD NOT LIKE THESE HOUSES IN THEIR AREA.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0131

860

21 MAR 2019



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11/03/2019

(For official use only)

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Title: <u>MR</u>	Title: _____
First Name: <u>COLIN</u>	First name: _____
Last Name: <u>GILBERTSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 ROSEHILL AVE</u> <u>BOLD ST HELENS</u>	Address: _____
Postcode: <u>WA9 4SX</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>13.03.19</u>
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Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>1 How and why where Taylor wumpy able to buy Greenbelt Land in 2016</p> <p>2 Are wildlife being protected</p> <p>3. At what point will development stop due to overcrowding and lack of space to move freely.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0132

21 MAR 2019

861

Ref: LPSD

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us ~~by no later than 5pm on Wednesday 13th March 2019.~~
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JACQUELINE

Last Name: GILBERTSON

Organisation/company: _____

Address: 2 ROSEHILL AVE

BOLD

ST HELENS

Postcode: WA9 4SX

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 13.03.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>* WHY DID TAYLOR WIMPY BUY GREEN LAND IN 2016?</p> <p>* IS ALL BROWN FILLED LAND BEING USED FIRST?</p> <p>* WE WILL LOSE THE SKYLARKS, HEDGECOCKS, FIELD FAIR, YELLOW HEAD, FINCH, PLEASANT, LESSER SPOTTED WOODPECKER, LARKS, PARTRIDGE, GOLD FINCH, NUTHATCH, IF BUILDING TEXAS PLACE.</p> <p>* WHERE WILL THE ROADS BE?</p> <p>* WILL ALL PUBLIC PATHS BE SURROUNDED BY LARKS INSTEAD OF NATURE WALKS?</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0133



St. Helens
Council

① - GEN ② - IDP

08 APR 2019

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ALAN	First name:
Last Name: MULLOCK	Last Name:
Organisation/company:	Organisation/company:
Address: 31 BROOKSIDE AVENUE ECCLESTON ST. HELENS	Address:
Postcode: WA10 4RN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 4/4/19
-----------------------	--------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at **www.sthelens.gov.uk/localplan**. If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**
Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

This version does not satisfy

- the requirement for Sustainable development and the criteria for Sustainable transport as the plan promotes increased car dependency away from remote transport hubs i.e. St Helens Town Centre bus & train centres.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- Food security in ignoring Agricultural Land Quality - the loss of Grade 1 and 2 Agricultural land i.e. land off E. James Road.
- IDP refers to current road improvements but no mention of local impact or improvement to roads such as Bleak Hill Road or skew Bridge Rainhill. Similarly, increased traffic will have impact on air-quality, noise, peace and health issues.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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[illegible]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0134



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

09 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Gary	First name: Clockface Action
Last Name: Appleton	Last Name: Group
Organisation/company:	Organisation/company:
Address: 35 Crawford St Clockface	Address:
Postcode: WA9 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 1 April 19
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's **preferred** method of communication. If no e-mail address is provided, **we will contact you by your postal address.**

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	

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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per Clockface Action Group.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is accepted a modification will be made to the Local Plan. Do you wish to participate at the oral part of the examination? (This applies to all but the 'No' response.)

<input checked="checked" type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please indicate what you wish to say to the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0135



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

09 APR 2019

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Paul V	First name:
Last Name: Appleton	Last Name:
Organisation/company:	Organisation/company:
Address: 35 Crawford St Clockface	Address:
Postcode: WA9 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 1 April 19
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

land odd without consultation .

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per Clockface Action Group.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

<input checked="checked" type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0136



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

09 APR 2019

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Vivienne	First name: Clackface Action Group
Last Name: Appleton	Last Name:
Organisation/company:	Organisation/company:
Address: 35 Crawford St Clackface	Address:
Postcode: WA9 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 1 April 19
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is Unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as detailed as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	

Sold without consultation

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per Clockface Action Group.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is accepted or modified, do you consider it necessary to participate at the oral part of the examination? (The hearing will be held on 11/12/2018)

✓	No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline the way you wish to state this if it is necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0137



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

30 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: PHILIP	First name:
Last Name: BICKERTON	Last Name:
Organisation/company:	Organisation/company:
Address: 3 DOUGLAS AVE.	Address:
Postcode: WA9 4SZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

30/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

925

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	✓	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulation Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

POLLUTION RECENT REPORTS CONFIRM THE ATMOSPHERE IN THIS AREA IS ONE OF THE MOST POLLUTED IN THE COUNTRY. IT IS SURROUNDED BY WARRINGTON, WIDNES, AND ST HELENS. THESE PLANS WILL MAKE IT WORSE. INFRASTRUCTURE. EXISTING ROADS CANNOT COPE WITH THE ADDITIONAL TRAFFIC. THESE HOUSES WOULD BRING, ALSO DOCTORS, DENTISTS AND HOSPITALS ARE STRUGGLING ALREADY.

WILDLIFE AT A TIME WHEN THERE IS NATIONWIDE CONCERN OVER SUSTAINING WILDLIFE ST HELENS COUNCIL WANTS TO DESTROY THE HABITATS OF NUMEROUS SONGBIRDS, FOXES, HARES, HEDGEHOGS ETC.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

BECAUSE I CANNOT STAND BY WHILE THE COUNCIL
MAKES YET ANOTHER BIG MISTAKE.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0138

928

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

10 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Nathan</u>	First name: _____
Last Name: <u>Orford</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Manston Bunglow</u> <u>31 Neills Road</u> <u>Bold</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
	No: _____

Signature: _____	Date: <u>21-3-19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ul style="list-style-type: none"> - No prior warning - endangered wildlife - traffic congestion - noise pollution - devalued property - eye sore - ruining the beauty of the green belt

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0139

935

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation (10 MAY 2019)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>HELEN</u>	First name: _____
Last Name: <u>BENTHAM</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>ROSEHILL ROAD</u>	Address: _____
<u>DOUGLAS AVE</u>	_____
<u>BOLD</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>14/3/2019</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

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If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p>
<p>There are lots of 'brown' land in St Helens that should be utilised for building and not the green belt. These areas probably present more problems for development rather than nice green field.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I thought that the Govt had stipulated that green belt was not to be available for building whilst 'brown' land was available. Also we bought our properties because of the green belt surrounding us

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0140

937

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

10 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>TERESA</u>	First name: _____
Last Name: <u>PARNER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 Douglas Ave</u>	Address: _____
<u>Bury</u>	_____
<u>St. Helens</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>13/3/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out your comments</u> .
<p>This is a green belt area + should remain as such. There is plenty of brown land available elsewhere to build. The increase in traffic doesn't even seem to have been a consideration either. Lots of walkers + wildlife enjoy this area, + to turn it into a concrete jungle is just not acceptable.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0141

940 ① - GEN ② - GEN ③ - GEN
10 MAY 2019

PF0861



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

10 MAY 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: WILLIAM

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The Surrounding infrastructure will not support so many new houses.</p> <p>Schools + G.P. Surgeries are already struggling and could not cope with the influx of people this plan would bring to the area.</p>	

①

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the plan must go ahead. A lot fewer houses need to be built in this area.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0142

940 ① - GEN ② - GEN ③ - GEN
10 MAY 2019

PF0861



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

10 MAY 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: WILLIAM

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

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Justified?	<input checked="" type="checkbox"/>
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There is a lot of Wild life on this land including Brown Hares. These beautiful creatures are becoming scarce and are therefore PROTECTED under the Wild life + Countryside act of 1981.

②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DO NOT DESTROY THE HABITAT FOR
THESE BIRDS & ANIMALS.

USE BROWN FIELD SITES !!!

Please continue on a separate sheet if necessary

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--	--

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PO0143

940 ① - GEN ② - GEN ③ - GEN
10 MAY 2019

PF0861



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

10 MAY 2019

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(we will correspond via your agent)

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First Name: WILLIAM

Last Name: ALLEN

Organisation/company: _____

Address: 35 NEILLS ROAD

BOLD

ST. HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12th March 2019

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☒ Yes (via email)

☐ No

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RETURN DETAILS

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Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The local authority need to make sure that all BROWN FIELD SITES, have been exhausted before using greenbelt land.
DONT TAKE THE EASY OPTION OF using greenbelt land.

3

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Look at other sites in St Helens that are not green belt land.
Not sure that all these have been considered.

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

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--

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PO0144



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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Part A – Personal Details
Part B – Your Representation(s).

① - LPAOS

② - GENERAL

PART A – YOUR DETAILS

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Mr</u>	Title:
First Name: <u>Alan</u>	First name:
Last Name: <u>Makin</u>	Last Name:
Organisation/company: <u>Bold Parish Council</u>	Organisation/company:
Address:	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature		Date:	11/05/2019
-----------	--	-------	------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

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Please use a separate copy of Part B for each separate comment/representation.

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See attached sheet

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination

X

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This representation is on behalf of Bold Parish Council

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

BOLD PARISH COUNCIL
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

The Parish Council recognise the need for viable land to meet the housing and employment needs of the future and believe an adopted Local Plan is the best mechanism for ensuring development is targeted in the right areas and green space is protected. However, the Parish Council are concerned about the number of new homes and employment land that is planned for Bold Parish. The proposed developments will more than double the current population of the Parish and a balanced approach across the borough has not been adopted in relation to the allocation. ①

The Parish Council question the legal compliance of the Local Plan in its current form in relation to the conformity with the Bold Forest Area Action Plan, as adopted by St Helens Council in July 2017, and listed in the Local Development Scheme 2018-2021¹ as an adopted development plan document. ②

The Area Action Plan was seen as 'breaking new ground on how areas should be planned in the future.'² 'The Area Action Plan was developed making use of neighbourhood planning principals but in the context of a formal development plan.'³ The local community and the Parish Council were heavily involved in the development of the plan. 'Community groups and individuals need a voice in the development and management of the Forest Park if it is to be a community asset.'⁴ ②

The Action Plan embedded the importance of community involvement in the following Policy:

Bold Forest Park Area Action Plan Policy BFP COM1: Community Network Forum⁵

The Council and its partners will facilitate a network of groups (including Parish Councils) and individuals in and around the Forest Park, who wish to work together to develop community led initiatives which will further the aims of the Forest Park and meet the needs of the community. The network will act as an umbrella for community interest groups such as Friends Groups, Special Interest Groups, Special Needs Groups, Uniform Groups and Sporting Groups.

Justification: Community consultation confirmed the community was supportive of Bold Forest Park being developed. In the long-term, community need and opinion must under-pin the development of the Bold Forest Park. A community network will provide the vehicle for the community to organise in to a cohesive unit that can help to drive the Forest Park initiative forward.

A key part of the vision for St Helens set out in the St Helens Plan states that the Council wishes to see all partners "consult, engage and empower communities".

¹ St Helens Council Local Development Scheme 2018-2021, Section 2.1

² Bold Forest Park Area Action Plan, Adopted 2017, Foreword

³ Bold Forest Park Area Action Plan, Adopted 2017, Foreword

⁴ Bold Forest Park Area Action Plan, Adopted 2017, Page 14, 6.3.6

⁵ Bold Forest Park Area Action Plan, Adopted 2017, Page 49

BOLD PARISH COUNCIL
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

As part of the Governments Frontrunner, Neighbourhood Planning Scheme, the Forest Park Area Action Plan, although a different mechanism, has actively sought to embrace Neighbourhood Planning principals. As such community empowerment is a fundamental aim of this plan.

The Parish Council are particularly concerned with the level of community involvement in the development of the Local Plan, specifically in relation to the Bold Forest Park. The Parish Council have been contacted by several concerned residents who originally were unaware of the plan and once aware the impact the developments at 4HA and 5HA will have on the Forest Park, local infrastructure, services and amenities.

The Parish Council believe the developments planned at 4HA and 5HA will jeopardise the success of the Bold Forest Park Area Action Plan and lead to the aims and objectives of the plan not being met and compromises several policies within the Forest Action Plan.

The Parish Council also share the concerns of the community in relation to the impact on infrastructure, service and amenities. In recent years, The Parish has already seen a number of housing developments in close proximity with planning permission granted for more. Despite the significant increase in the number of new homes there has been little to no investment in education and health services within the area. The primary schools are in high demand with some in particular, being over-subscribed. The two local high schools that serve the community have seen the numbers of pupils increase with no investment for expansion. The doctors surgeries that cover the area can be described as at breaking point with a number of doctors approaching retirement age and reported difficulty in securing new. The Local Plan does not contain any plan as to how increased provision for existing and incoming residents will be achieved in terms of structure and funding. The Parish Council believe this is essential prior to development plans to ensure the health and wellbeing of local residents is not compromised at any point and developments do not increase the pressure on already over stretched services.

The area has seen a significant increase in the amount of traffic on the roads over recent years due to the number of new homes that have been built not only in St Helens but the neighbouring boroughs also. The Parish is the main access route to the M62 motorway and the neighbouring boroughs of Warrington and Widnes. The Parish is saddled with a Victorian road network which in some cases will be difficult to improve effectively. There are already significant concerns around the volume and speed of traffic on Gorsey Lane, that will run south of the 4HA development. The road is used as a rat run for people heading to J8 of the M62 in Burtonwood, attempts to slow traffic down has had limited results. It is also compounded with being the main access point to Bold Industrial Estate and therefore used by a significant number of HGVs and on occasion abnormal loads. These require a police escort and limit the scope of traffic calming measures available. An alternative route that is sometimes used is Bold Rd/Reginald Rd/Mill Lane. Bold Rd runs along the north boundary of 4HA, eventually running in to Mill Lane and past a primary school. Clock Face Rd has also

BOLD PARISH COUNCIL
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

become heavily congested and is raising concerns on health and safety. There are bottle necks on the road, mainly at points lined by terrace houses, which as a result are proving difficult to resolve. The road is used as a main walking route to and from the local primary schools and is the location of a children's day nursery. The Parish council would like to encourage more parents to walk their children to school, but the safety aspect is a real concern.

①

There are areas within Bold Parish and the surrounding areas that are considered some of the most deprived areas in the country. Poor health and wellbeing is a key concern in these areas and a priority for improvement. Childhood obesity is significantly above average. The Forest Park offers invaluable access to free green spaces and a range of activities.

①

Bold Forest Park Area Action Plan Policy BFP COM3: Bold Forest Park as a Flagship for Delivery of Community Health Improvement⁶

The community put great emphasis and value on the green spaces at 4HA and 5HA and the wildlife it supports. The Public Rights of Way across both areas are heavily used. The Parish Council are concerned the significant developments planned for 4HA and 5HA will restrict community access to the Forest Park and reduce the range of activities the Park is able to offer having a further derogatory effect on the most vulnerable members of our community.

①

The countryside aspect and attractiveness of the Forest Park is a valuable asset in encouraging visitors to the Park and key to encouraging rural enterprise and boosting the rural economy. The Parish Council are aware of one equestrian business and stables that will close as a direct result of the development at 4HA. The stables are a community hub offering opportunities to many disadvantaged youngsters and encouraging positive involvement in the community. The stables are home to 62 horses, the owners and visitors to these horses increase footfall in other businesses within the Park. Urbanisation of large areas of the Park will detract away from the feeling of being in the countryside and deter many visitors to the Park. This has already been evident in two house sales that have collapsed, the buyers pulling out due to the threat of mass development. These issues in combination are expected to have a devastating effect on the local economy and opportunities for residents.

① - 4HA

①

Bold Parish Council believes the Parish and the Bold Forest Park is a unique offering within the Borough that should continue to be afforded the special protection Green Belt brings. Bold Parish Council feel they are unable to support the mass development planned for the area in terms of infrastructure, services, amenities and community health and wellbeing and any such development will severely jeopardise the success and implementation of the Bold Forest Park Area Action Plan.

②

⁶ Bold Forest Park Area Action Plan, Adopted 2017, Page 50

BOLD PARISH COUNCIL
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

Signed on behalf of Bold Parish Council

Chairman



Vice Chairman



PO0145



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>BOLD + CLOCK FACE ACTION GROUP</u>
First Name: <u>SUSAN</u>	First name: _____
Last Name: <u>DAVEY</u>	Last Name: _____
Organisation/company: <u>BOLD + CLOCK FACE ACTION GROUP</u>	Organisation/company: _____
Address: <u>12 FRENCHFIELD CRES</u> <u>CLOCK FACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4FZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>11/3/19</u>
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Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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PO0146



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>BOLD + CLOCK FACE ACTION GROUP</u>
First Name: <u>SUSAN</u>	First name: _____
Last Name: <u>DAVEY</u>	Last Name: _____
Organisation/company: <u>BOLD + CLOCK FACE ACTION GROUP</u>	Organisation/company: _____
Address: <u>12 FRENCHFIELD CRES</u> <u>CLOCK FACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4FZ</u>	Postcode: _____
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should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
 - a. SA1. To protect and enhance biodiversity and
 - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

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PO0147



St.Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

① GCV ③ LPA02 ⑤ GBR
② GCV ④ LPA05

PIR 4H1

PF1273

Ref: LPSD

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First Name: BRIAN

Last Name: DAVEY

Organisation/company: BOLD + CLOCK
FACE ACTION GROUP

Address: 12 FRENCHFIELD CRES

CLOCK FACE
ST HELENS

Postcode: WA9 4FZ

Tel No: [REDACTED]

Mobile No: [REDACTED]

Email: [REDACTED]

2. Your Agent's Details (if applicable)

Title: BOLD + CLOCK FACE ACTION

First name: GROUP

Last Name: [REDACTED]

Organisation/company: [REDACTED]

Address: [REDACTED]

Postcode: [REDACTED]

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Signature [REDACTED]

Date: 11/3/19

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Please read the Guidance Note for this form before completing it.			
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PO0148



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PIR 4H1

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3. To which part of the Local Development Scheme does your comment relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table		Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e			

4. Do you consider the Local Development Scheme to be:			
<i>Please read the Guidance Note for this form before completing it.</i>			
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Development Scheme to be:	
<i>Please read the Guidance Note for this form before completing it.</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Development Scheme to be not legally compliant or is unsound or fails to comply with the duty to cooperate.	
<i>Please read the Guidance Note for this form before completing it.</i>	
If you wish to support the Local Development Scheme, please also use this box to set out your comments.	

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There

①

②

should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
 - a. SA1. To protect and enhance biodiversity and
 - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matters you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. A written statement if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans ^{to ensure} as the best effort ^{is} made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0149



St. Helens
Council

① Para 1.4.1 ② LPA02

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>DEBRA</u>	First name:
Last Name: <u>COONEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>44 CRAWFORD STREET</u> <u>CLOCK FACE</u>	Address:
Postcode: <u>WA9 4XH</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature

Date:

11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.ssthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

**Please use a separate copy of Part B for each
separate comment/representation.**

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?					
Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or falls to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

There has been no consultation or notification to residents.

No written notification displayed on lampposts etc.

The building goes against the protection of greenbelt land and destroys the natural habitats of the local wildlife.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0150

Representor Details

Web Reference Number	WF0021
Type of Submission	Web submission
Full Name	Mrs Michelle Mcelroy
Organisation	
Address	234 clockface road clockface st helens merseyside wa94lx Wa94lx
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	All
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

7. Please set out modification(s) you consider are necessary

I oppose to any building on greenbelt land

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/23/2019 8:47:57 PM
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PO0151

AK 8HS

① General

② LPA06

Representor Details

Web Reference Number	WF0027
Type of Submission	Web submission
Full Name	Mrs Pauline Parr
Organisation	
Address	25 Howards Lane Eccleston St Helens WA10 5HX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not positively prepared because it is based on flawed predictions of future growth. With a falling local population, the decline of St Helens town centre and the availability of brownfield sites elsewhere within the borough, it is not sound policy to sacrifice greenbelt and productive farmland while the town centre decays.

The local infrastructure has not been considered clearly. Local primary and secondary schools are already oversubscribed and there is nowhere to build more schools if this area is used for housing. Traffic issues are a major concern. The adjacent roads are residential and could not support an increase in traffic. Houghtons Lane is already quite treacherous for pedestrians. Pollution and noise would be dreadful in the new area of housing.

Not justified as 8HS is at present an area of Grade 1 & 2 agricultural land. As we face a possible exit from the EU, we need to retain as much farmland as we can in order to feed the population.

Not effective because building on 8HS is bringing houses to a town that is in dire need of regeneration to keep the population already here. The families who might move into these new homes would be unlikely to work in St Helens and unlikely to shop in St Helens. There are many houses for sale in the area. Building so many new homes without the need for them will make St Helens house-rich, but amenities-poor!

①

②

Not consistent with national policy because because there are brownfield sites available locally, which would be more suitable for housing development. National policy is that if brownfield sites are available, greenbelt should not be used for housing.

2

7. Please set out modification(s) you consider are necessary

8HS should be changed from 'safeguarded for development' and remain as green belt!

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/13/2019 4:57:47 PM

PO0152

Representor Details

Web Reference Number	WF0059
Type of Submission	Web submission
Full Name	Mrs Zoe Garnett
Organisation	
Address	23 The Pastures Bold St Helens Merseyside WA9 4ZA
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is in line with and the same as that of the Bold and Clock Face Action group.

7. Please set out modification(s) you consider are necessary

My view is in line with and the same as that of the Bold and Clock Face Action group

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 2:35:27 PM
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PO0153

Representor Details

Web Reference Number	WF0065
Type of Submission	Web submission
Full Name	Mr Paul Davenport
Organisation	
Address	23 Begonia Gardens Bold St Helens WA9 4FT
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes, LPA02, 03 & 05
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Such a huge increase in available homes will only have a negative impact all near all aspects of local infrastructure and even quality of living.

There are already multiple housing developments in very local areas and there is a real risk of saturating the housing market in this area, reducing prices of homes therefore negatively impacting the wider economy of the town, overall reputation and living conditions socially.

Local roads cannot handle such an increase in traffic volume that would be caused and the allowed development should be greatly reduced from the current plans.

7. Please set out modification(s) you consider are necessary

The development should reduce the number of homes it proposes to build and only be completed if and when local infrastructure can cope with the increased local population.

Large single developments should be implemented in stages to prevent sudden and harse burdens on the area as a whole and then assess the actual need/demand for more homes at each stage of development to avoid saturation of the housing market and collapse of local house prices. St Helens is at risk of becoming a socially challenged area already without this increased pressure from an abundance of available homes

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 2:07:25 PM
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PO0154

①-LPA05 ②-LPA06 ③-GEN
④-Para 1.7.2 DTC ⑤-IDP

Representor Details

Web Reference Number	WF0094
Type of Submission	Web submission
Full Name	Mr Alan Ford
Organisation	
Address	19 Fistril Drive Windle St Helens WA10 6EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018, Demographer's Report, Economist Report

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from its protected status into the "safeguard" category.

1. It does not satisfy the requirement for Sustainable development

2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.

3. The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.

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①

4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities. ①
5. 8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt. The importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit. ②
6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. ①
7. Adequate regional and cross border collaboration has not been undertaken. ④
8. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
9. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
10. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
11. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ①
12. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
13. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
14. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). ③
15. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ⑤
16. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ⑤
17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted.
18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered. ②
19. The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back

into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough

2

7. Please set out modification(s) you consider are necessary

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site and identify further small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 12:09:37 PM
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PO0155

Representor Details

Web Reference Number	WF0097
Type of Submission	Web submission
Full Name	Mr R Nevitt
Organisation	
Address	12 Ribble Ave Rainhill L35 0NJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	St.Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The physical roadway infrastructure does not currently cope with the demands of the traffic volumes.

The school places are in demand and cannot cope with predicted numbers.

The NHS Medical services are overstretched.

The increase in population will by definition increase the likelihood of vandalism, anti-social behaviour which the Police and emergency services cannot currently cope.

Local wildlife would be greatly impacted due to the loss of yet more green space.

The local population would be adversely affected by the continued growth of urbanisation. This increase will without doubt lead to an increase in pollution, which in turn will lead to increased demand on NHS services due to ill-health.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 12:04:10 PM
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PO0156

①-LPA05 ②-LPA06 ③-GEN

④ Para 1.7.2 DTC ⑤-IDP

Representor Details

Web Reference Number	WF0099
Type of Submission	Web submission
Full Name	Mrs Jacqueline Ford
Organisation	
Address	19 Fistril Drive Windle St Helens WA10 6EF WA10 6EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because it is based on flawed methodology, weighted in favour of future potential development income rather than actually thoroughly exploring non-green belt site options that could be used to meet any theoretical population increases and unrealistic housing demands, without destroying green belt land forever land.

The plan is not effective as it is not deliverable and again based on flawed data.

It is not consistent with National Policy as it does not comply with NPPF 2018 and the requirements to protect green belt land where alternative brown fields sites are available.

I do not believe this version of the policy satisfies the following requirements and therefore requires significant review and substantially more justification for removing the Green Belt land in sector 8HS from it's protected status into the "safeguard" category.

1. It does not satisfy the requirement for Sustainable development

2. It does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs due to the poor public transport options in the area.

3. The sustainable housing, targets proposed are based on aspirational employment growth predictions rather than what is realistic.

①

②

③

①

4. It is not effective land use as it concentrates on Green Space development over town centre development with higher densities. ①

5. 8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt. The importance of food security and self-efficiency by ignoring Agricultural Land Quality, is even more crucial given the import restrictions that may be imposed following Brexit. ②

6. Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. ①

7. Adequate regional and cross border collaboration has not been undertaken. ④

8. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

9. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

10. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

11. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ①

12. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

13. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

14. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. ③

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). ⑤

15. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③

16. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ⑤

17. 8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is already noisy and polluted.

18. The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered. ②

19. The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back

into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

20. The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

Given all the above appoints, it is hard to see that the plan has been positively prepared and is instead being strongly influenced by the preference of housing developments rather than what is best for the residents of the borough.

2

7. Please set out modification(s) you consider are necessary

I feel that the Local Plan needs to place more emphasis on a commitment to using the numerous brown field's site or small sites in the borough to meet housing and business development needs rather than removing the green belt from it's current "protected" status with a view to pave the way to extensive housing developments (1000 units on the 8HS site) that are not required, certainly based on the data currently available for population projections, and not able to be supported by poor infrastructure, oversubscribed schools, Policing shortfalls, and adding increased strain on health services and road networks that are already failing under existing use.

8HS should be changed from the safeguarding for development category and maintained as Green Belt for the reasons above.

There is greater need to retain all Green Belt areas for the future of our communities. There is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst the beautiful, green belt land is lost along with the health benefits it brings and we lose the most important asset that St Helens can offer - it's green spaces and natural beauty - in favour of a concrete town.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 12:02:38 PM
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PO0157

Representor Details

Web Reference Number	WF0105
Type of Submission	Web submission
Full Name	Miss Laura Haworth
Organisation	
Address	12 Ruthin Court WA7 2GL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	all
Paragraph / diagram / table	all
Policies Map	all
Sustainability Appraisal / Strategic Environmental Assessment	all
Habitats Regulation Assessment	all
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Building on green belt land is unacceptable when sufficient brown field sites are still available. the extra traffic caused by building and houses will cause stress to the road network and impact current residents. there isn't sufficient amenities to support more developments. There are Bats that frequent the proposed site as well as other wildlife such as Barn Owls and these are endangered

7. Please set out modification(s) you consider are necessary

the plan needs to be found a different site

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 10:49:16 AM
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PO0158

Representor Details

Web Reference Number	WF0130
Type of Submission	Web submission
Full Name	Mrs Moira Mitchell
Organisation	
Address	12, Eccleston Gardens Eccleston Hill St. Helens WA103BN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Flawed historical data used for economic growth predictions for St.Helens.

Proposed plans would have negative effect on farming ,a loss of grade 1 & 2 agricultural land.

Increase of housing being built on the green belt adjacent to the East Lancs road and therefore more traffic growth causing severe problems on the road_ disruption at Windle already causing traffic build up on all roads in Eccleston at present.It would only get worse increasing noise and pollution
Education and Healthcare issues not considered

Brownfield sites are available_ make use of them before you touch the green belt..

7. Please set out modification(s) you consider are necessary

Take out the greenbelt land from the development proposals and develop areas in and around the town centre.

Look again at the predicted needs for housing_use up-to-date forecasts not those from 2014.

Insufficient public transport needs addressing.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:28:15 PM
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PO0159

Representor Details

Web Reference Number	WF0151
Type of Submission	Web submission
Full Name	Mr Christopher Horton
Organisation	
Address	30 Crocus Gardens New Bold St Helens WA9 4EE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	YES
Paragraph / diagram / table	
Policies Map	YES
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is in line with and the same as that of the Bold and Clock Face Action Group. Furthermore I am concerned about the impact the new housing development will have on flooding in the surrounding areas. The roads surrounding the fields are already subject to flooding after heavy rain and I believe that this will only be made worse by concreting over the fields which already absorb a lot of rain water.

7. Please set out modification(s) you consider are necessary

My view is in line with and the same as that of the Bold and Clock Face Action Group.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 8:03:26 PM
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PO0160

① - LPA05 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0152
Type of Submission	Web submission
Full Name	Mrs. Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The St Helens local plan is not justified for many reasons. One main reason is that they have based their housing needs on old population projections from the Office of National Statistics and not the most recent (and significantly lower) Office of National Statistics projections which are almost 25% lower than the figures they have used in this local plan. The population of St Helens has been in constant decline since 1981 so this substantial increase in housing is not required as can be proven by the figures released at the end of 2018 by the Office of National Statistics and also by looking at the census records.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. I also know that there are some sites that are currently owned by housing developers, and have been for a few years, yet no house building has yet taken place. These areas have also NOT been included in the local plan for housing, despite the fact the land has already been sold in the past and has approval for housing (an example would be the land next to Tesco in Haydock). This is a classic example of land grabbing. If the borough has a need for housing, surely these brownfield areas should be included in the local plan before any other areas (especially Greenbelt areas) and developers that

①

are holding on to this land should be forced to develop it. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

There is also a complete lack of infrastructure in this area for the existing population. There is already a shortage of school places and there are no plans to build new schools or extend the current ones we have. There is one doctors surgery with long waiting times for appointments – the last time I needed one I had to wait over three weeks. The public transport in Garswood would also need significant improvements if the council proposes building additional homes in the area. According to figures calculated by website On Time Trains, services arrived on time just 7% on average from Garswood to Liverpool Lime Street. In addition, there is no access to the Liverpool-bound platform for people with mobility issues or people with pushchairs since there is only a stepped footbridge to the far platform. Users that need access and who wish to travel to Liverpool would have to make their way to Bryn station which is a ten minute drive away and cannot be accessed from Garswood on other methods of public transport like buses. There are very few access roads in and out of this area and they are already extremely busy. Since public transport in the local area is not sufficient for the existing housing numbers, a substantial increase in housing would result in considerably more cars on local roads – this cannot be supported with the current infrastructure and would require additional funding. I do not feel that St Helens Council have sought sufficient evidence on how population growth in the Garswood area would impact on any of the local infrastructure. I also do not feel that they have conducted enough research on the impact this plan would have on local utilities and services such as broadband access and water supply, which there are already numerous issues with for the existing residents in the area.

There is a long history of flooding on Birch Grove due to water running off the fields that are proposed to be built on. By removing these fields from the Greenbelt for future development, there is a risk of increased flooding when they are eventually built on since the water will have nowhere to soak and will result in even more water flooding into Birch Grove.

Access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate – there would need to be highways improvements in order to give access to any future developments. These works must be funded by developers and not Council Tax payers.

The current local plan is not legal. A statutory requirement is that letters must be sent to residents who are due to have their properties removed from the Greenbelt. Several properties that are affected in this way have not been notified.

There is no statement of common ground with neighbouring authorities and shows a clear lack of communication and joint working. This is of particular importance to Garswood as it is an area that borders with Wigan Council. The lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

7. Please set out modification(s) you consider are necessary

This local plan should not go ahead without the guarantee of significant investment to improve local services and infrastructure which are already strained with the existing population. Any increase in population without funding would render local services and infrastructure unserviceable.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 8:03:24 PM
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PO0161

① - LPA06 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0154
Type of Submission	Web submission
Full Name	Mrs Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	1HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The St Helens local plan is not justified for many reasons. One main reason is that they have based their housing needs on old population projections from the Office of National Statistics and not the most recent (and significantly lower) Office of National Statistics projections which are almost 25% lower than the figures they have used in this local plan. The population of St Helens has been in constant decline since 1981 so this substantial increase in housing is not required as can be proven by the figures released at the end of 2018 by the Office of National Statistics and also by looking at the census records.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. I also know that there are some sites that are currently owned by housing developers, and have been for a few years, yet no house building has yet taken place. These areas have also NOT been included in the local plan for housing, despite the fact the land has already been sold in the past and has approval for housing (an example would be the land next to Tesco in Haydock). This is a classic example of land grabbing. If the borough has a need for housing, surely these brownfield areas should be included in the local plan before any other areas (especially Greenbelt areas) and developers that

①

are holding on to this land should be forced to develop it. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

There is also a complete lack of infrastructure in this area for the existing population. There is already a shortage of school places and there are no plans to build new schools or extend the current ones we have. There is one doctors surgery with long waiting times for appointments – the last time I needed one I had to wait over three weeks. The public transport in Garswood would also need significant improvements if the council proposes building additional homes in the area.

According to figures calculated by website On Time Trains, services arrived on time just 7% on average from Garswood to Liverpool Lime Street. In addition, there is no access to the Liverpool-bound platform for people with mobility issues or people with pushchairs since there is only a stepped footbridge to the far platform. Users that need access and who wish to travel to Liverpool would have to make their way to Bryn station which is a ten minute drive away and cannot be accessed from Garswood on other methods of public transport like buses. There are very few access roads in and out of this area and they are already extremely busy. Since public transport in the local area is not sufficient for the existing housing numbers, a substantial increase in housing would result in considerably more cars on local roads – this cannot be supported with the current infrastructure and would require additional funding. I do not feel that St Helens Council have sought sufficient evidence on how population growth in the Garswood area would impact on any of the local infrastructure. I also do not feel that they have conducted enough research on the impact this plan would have on local utilities and services such as broadband access and water supply, which there are already numerous issues with for the existing residents in the area.

There is a long history of flooding on Birch Grove due to water running off the fields that are proposed to be built on. By removing these fields from the Greenbelt for future development, there is a risk of increased flooding when they are eventually built on since the water will have nowhere to soak and will result in even more water flooding into Birch Grove.

Access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate – there would need to be highways improvements in order to give access to any future developments. These works must be funded by developers and not Council Tax payers.

The current local plan is not legal. A statutory requirement is that letters must be sent to residents who are due to have their properties removed from the Greenbelt. Several properties that are affected in this way have not been notified.

There is no statement of common ground with neighbouring authorities and shows a clear lack of communication and joint working. This is of particular importance to Garswood as it is an area that borders with Wigan Council. The lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

7. Please set out modification(s) you consider are necessary

This local plan should not go ahead without the guarantee of significant investment to improve local services and infrastructure which are already strained with the existing population. Any increase in population without funding would render local services and infrastructure unserviceable.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/12/2019 7:58:18 PM

PO0162

Representor Details

Web Reference Number	WF0155
Type of Submission	Web submission
Full Name	Mr Simon Ho
Organisation	
Address	55 Daffodil Gardens, St Helens, WA9 4LP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is in line with and same as that of the Bold and Clock Face Action Group.

7. Please set out modification(s) you consider are necessary

My view is in line with and same as that of the Bold and Clock Face Action Group.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:57:52 PM
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PO0163

① - LPA05 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0157
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I feel this local plan is not justified as I don't feel it is positively prepared. It doesn't meet the area's needs as the need for extra housing has been greatly exaggerated. The area of St Helens has shown to have a declining population since 1981 and I feel the local council should have clear and obvious proof of population growth to justify theses plans. The council have used old population projections from the office of national statistics and not the most recent statistics which show population growth to be significantly lower than those put forward by the council.

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to Garswood, an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The local schools, doctors and bus routes are very limited and a surge in housing would require significant investment in this area. This would further impact local roads as people would be forced to use cars, as local transport options wouldn't be able to support the larger numbers.

I do not feel that St Helens council have sought sufficient evidence on how population growth in the Garswood area will impact the local infrastructure and I don't feel St Helens council has conducted

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③

①

enough research on the impact this plan would have on local utilities and services such as broadband access and water supply.

Garswood has a small number of access roads that are already busy, this plan would not be effective without significant investment in roads by any developer, which is unrealistic.

The current plan is also not legal. A statutory requirement is that letters must be sent to people in situations in which their houses are removed from Greenbelt, this has not been done in all situations.

National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building and will not promote the regeneration of many of St Helen's former industrial land.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt unless guarantees can be made to fund significant improvements in local services and infrastructure.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:53:43 PM
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PO0164

① - LPA06 ② - GEN ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0158
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I feel this local plan is not justified as I don't feel it is positively prepared. It doesn't meet the area's needs as the need for extra housing has been greatly exaggerated. The area of St Helens has shown to have a declining population since 1981 and I feel the local council should have clear and obvious proof of population growth to justify theses plans. The council have used old population projections from the office of national statistics and not the most recent statistics which show population growth to be significantly lower than those put forward by the council.

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to Garswood, an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The local schools, doctors and bus routes are very limited and a surge in housing would require significant investment in this area. This would further impact local roads as people would be forced to use cars, as local transport options wouldn't be able to support the larger numbers.

I do not feel that St Helens council have sought sufficient evidence on how population growth in the Garswood area will impact the local infrastructure and I don't feel St Helens council has conducted

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enough research on the impact this plan would have on local utilities and services such as broadband access and water supply.

Garswood has a small number of access roads that are already busy, this plan would not be effective without significant investment in roads by any developer, which is unrealistic.

The current plan is also not legal. A statutory requirement is that letters must be sent to people in situations in which their houses are removed from Greenbelt, this has not been done in all situations.

National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building and will not promote the regeneration of many of St Helen's former industrial land.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt unless a guarantee can be made to fund significant improvements in local services and infrastructure.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:49:32 PM
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PO0165

Representor Details

Web Reference Number	WF0166
Type of Submission	Web submission
Full Name	Mrs Suzanne Pattenden
Organisation	
Address	12 The Pastures St Helens WA9 4ZB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is in line with and the same as that of Bold and Clock Face Action Group

7. Please set out modification(s) you consider are necessary

My view is in line with and the same as that of Bold and Clock Face Action Group

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:33:54 PM
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PO0166

①-LPA06 ②-GEN ③- Statement of Common Ground

Representor Details

Web Reference Number	WF0168
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 - 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

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The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate.

Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

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7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:03:24 PM
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PO0167

①-LPA05 ②-GEN ③- Statement of Common Ground

Representor Details

Web Reference Number	WF0169
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

②

①

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

That this land be deleted from proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 6:56:30 PM
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PO0168

① - GEN ② - LPAOS

Representor Details

Web Reference Number	WF0170
Type of Submission	Web submission
Full Name	Mrs Joanne Marie Holland
Organisation	
Address	8 Arncliffe Drive Burtonwood Warrington Cheshire WA5 4NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Bold/Clock Face development
Paragraph / diagram / table	
Policies Map	St Helens, Gorsey Lane, Clock Face
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I formally raise an objection to the St Helens council 'local Plan' and removal of greenbelt land for development. At no point during the consultation process have I been made aware of the 'plan' via letter, newspaper, flyer or in person from my councillor. I ask that the council return all identified land to protected greenbelt status and utilise existing brownfield sites to meet housing requirements.

There are no supporting Infrastructure plans following the development progression. The impact of additional houses on roads which already have a lot of traffic will be massive. It is essential that another link road is created so that all the traffic from any new housing does not only have the Burtonwood link to the motorways.

The impact on wildlife should be taken into consideration, the loss of Greenbelt land in rural areas seems to be illegal – as laws seem to be changing to suit the council.

7. Please set out modification(s) you consider are necessary

I don't think that it can be made legally compliant as "greenbelt" line is meant to be protected land.

"A green belt or greenbelt is a policy and land use zone designation used in land use planning to retain areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas. A green belt is an invisible line designating a border around a certain area, preventing development of the area and allowing wildlife to return and be established. "

Why has this suddenly changed - we should be addressing the impact on global warming and these plans will add to the existing problems.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 6:43:33 PM
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PO0169

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0176
Type of Submission	Web submission
Full Name	Mrs Susan White
Organisation	
Address	Orrits Nook Cottage Higher Lane Rainford St Helens Merseyside WA11 8NQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	All
Paragraph / diagram / table	All
Policies Map	All - but particularly LPSD 8HA Rainford
Sustainability Appraisal / Strategic Environmental Assessment	All
Habitats Regulation Assessment	All
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

LP is not sound because:-

NO Grade 1 agricultural land should be released from the Greenbelt - this is just ridiculously short sighted, now more than ever - grade 1 agricultural land IS and IS GOING TO BE required more than ever for this country's future. There will never be any sufficient justification to release the perfect growing land. Just because a Borough has more area of Prime Growing land than others should not lead to that area being removed from the GB. Each area provides it's own contribution to meeting the needs of the people - Rainford's highest quality farming land provides the local/regional/national/international food, there is nothing more exceptional than that!!

No duty to co-operate:-

No formal notification of plan, even though my home's drive is within 200feet of area designated for removal from GB/development

This form makes it very difficult to comment -

I do not have the legal knowledge to say whether the LP is legally compliant or not, but I could not submit the form without ticking a box!

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7. Please set out modification(s) you consider are necessary

No Grade 1 agricultural land to be removed from the Green belt.

If there is any lesser Grade of GB land then this should be considered for release

Make the inclusion of everyone in consultation much easier i.e., just a blank comment box!!

3 properties share our private road - all border on the proposed area - all should receive formal notification of plans.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 5:07:05 PM
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PO0170

Representor Details

Web Reference Number	WF0178
Type of Submission	Web submission
Full Name	Mrs Lisa Bennett
Organisation	
Address	8 Begonia Gardens St Helens Wa94ft
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There have been no plans to consider the impact to schools, doctors, or transport links that so many homes could have.

The development date has been moved by 15 years without local consultation.

More importantly we value our green belt land and the wildlife it supports, it is disgraceful to build on this land, when you could better redevelop abandoned industrial and residential areas!

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 4:43:43 PM
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PO0171

①-LPA05 ②-GEN ③-LPA04

Representor Details

Web Reference Number	WF0182
Type of Submission	Web submission
Full Name	Mr Peter Roper
Organisation	
Address	2 Knutsford Close Eccleston St Helens WA10 5RD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The methodology is flawed, is not deliverable and does not comply with NPPF 2018. _____
it does not meet:

1. meet the requirement for Sustainable development _____ ①
2. the criteria for Sustainable transport as the plan promotes increased car dependency remote from _____
transport hubs. _____ ②
3. sustainable housing, targets proposed are based on aspirational employment growth predictions. _____
4. effective land use by concentrating on Green Space development over town centre development _____
with higher densities. _____ ①
5. Does not utilise/recognise brown field development _____
6. does not recognise Agricultural Land Quality. _____

The following are also ill-considered.

1. Economic growth predictions for are based on flawed historical data that does not justify the _____
aspirational targets included in the plan. _____ ③

2. The Housing Need assessment does not use a recognised and accepted methodology. _____

3. The Plan makes adequately consider brown field opportunities. _____

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is _____
adequately considered along with the impact on farming and associated jobs. _____ ①

4. Traffic impacts have not been adequately addressed. In fact the plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF.
5. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

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7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Refocus on development of brownfield sites for the benefit of all communities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 3:40:07 PM
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PO0172

①-LPA05 ②-LPA06 ③-GEN ④-IDP

Representor Details

Web Reference Number	WF0186
Type of Submission	Web submission
Full Name	Miss Marie Hull
Organisation	
Address	17 Sandfield Road Eccleston St.Helens Merseyside WA10 5LR
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I don't believe that St.Helens Council has listened to the people of the Borough that bothered to respond to the Preferred Options stage of the Local Plan. This new Submission Draft of the Local Plan is in no way an indication that they have reviewed and considered those responses and adapted the plan accordingly. I fear having read it, The Local Plan has increasingly just become a paper exercise that will eventually be undemocratically forced down our throat whether we like it or not.

I think St. Helens Council are just steaming ahead with their blinkered vision not listening to the people of the borough because firstly, how can they justify releasing Green Belt Land to be developed or safeguarded for development when we as a Borough have so much Brownfield land.

I believe the council are OBLIGED to consider all land but they will not consider contaminated land even when we have so much of it. Our Borough has throughout history and still to this day paid its dues with industrial related deaths of its residents, diseases and the prominent eyesores of past industry. It is 2019 we no longer need these ugly derelict scars blighting our Borough. They need to be cleaned up no matter the cost, developers have very healthy profits they could help and St.Helens Council could work with the Liverpool City Region Combined Authority to make this happen. These past industrial contaminated sites need to be turned into something that we as a Borough can be proud of and that provide for the future generations of the town whose ancestors

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gave their lives to build. If the Brownfield first approach was genuinely adopted we could see this land contaminated or not cleaned up to provide housing for people as well as making the Borough a more desirable place to live in general. At the moment two thirds of the Boroughs land is contaminated. If the Local Plan were to include just 7% of the total area of the lowest level contaminated sites to be considered for development, then all Green Belt Land and Safeguarded land could be removed from consideration. The Plan is not effective.

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The Green Belt Review (2018) does not feed in enough solid facts and the people's opinions of the borough. The land marked as HA16 which is now referred to as 8HS is Grade 1 and 2 agricultural land. This land is vital for jobs, food production, wildlife habitats and the health and well being of many. I can refer to the Green belt land labelled 8HS as I use, appreciate and value this space daily. St. Helens Council fail to acknowledge food security by ignoring Agricultural Land Quality. The land marked as 8HS has far more negative factors associated with it such as flooding, public rights of way within it, effect on biodiversity, transport infrastructure etc than other pieces of land available yet The Local Plan still favours this site when others were discounted from the plan for far less. It was published in the journal The Lancet in 2017 the link between living near major roads and the incidence of dementia, Parkinson's Disease and multiple sclerosis. Why does this local plan favour a site for housing that is right next to a main A road with a terrible safety history? This Plan is not justified or effective.

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From reading this Local Plan it is clear it promotes low density edge of town development which will mean an enormous amount of car journeys to already struggling distant amenities. It does not satisfy the criteria for sustainable transport. The plan has not been positively prepared. The increased dependency on cars will have a negative impact on air quality, noise and general health. St. Helens Council are obliged to make effective use of land and by opting to favour these types of developments they are in no way helping to ease the supposed housing crisis only the bank balances of large building development firms. They are concentrating on Green Space development over town centre development with higher densities.

③

The figures St. Helens Council are using are not the most recent and current, so I do worry that other projections and data may as well be mythical and are in fact manipulated. Data from 2016 should be used over data from 2014. The Plan is not justified.

I believe another mythical element of the local plan is the scale of growth being aspired to the borough along with the infrastructure needed to support it. The housing targets proposed are based on aspirational employment growth predictions. Lets face it we can all be aspirational or as I like to say live in cloud cuckooland. The infrastructure delivery plan only scrapes the surface of how they're dealing with what we face today never mind what will be in place if The Local Plan is adopted. The Plan is not effective.

①

I cant' believe this to be a sound Local Plan as I can only believe the truth and facts, something I feel this plan is lacking in.

④

7. Please set out modification(s) you consider are necessary

I believe the modifications needed are to remove all Green belt land which is considered for development or safeguarded for development from the plan. This is for the health and wellbeing of present and future generations. There are no exceptional circumstances to release this Green Belt and this must be realised.

The Brownfield first approach must be put into action and developed before the classification of Green belt land is even changed never mind allowed to be developed.

History has shown that decisions made because of lack of funds within a council are never good, justified or right. To name a few; selling off school fields and cheapening school meals resulting in major obesity problems across the population. Selling off council houses resulting in there now being hardly any council house stock and people at the mercy of slum private landlords.

Why make decisions to remove Green belt and force future generations to suffer the consequences. Develop the Brownfield sites and clean up the contaminated land and make this a Local Plan that sets a precedent and starts a new movement for how our country should be developed. Be the council that puts St. Helens firmly back on the map for the right reasons. A Local Plan that shows the future generations are at its heart, not profits.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 2:24:47 PM
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PO0173

Representor Details

Web Reference Number	WF0187
Type of Submission	Web submission
Full Name	Miss Lynsay Adair
Organisation	
Address	7 Bentley Street Clock Face WA9 4RP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	yes
Paragraph / diagram / table	yes
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

In accordance with Bold and Clockface action group

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 1:24:09 PM
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PO0174

① - LPA05 ② - GEN ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0191
Type of Submission	Web submission
Full Name	Mrs Susan Vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package

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includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 10:50:56 AM
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PO0175

① - GEN ② - GEN

Representor Details

Web Reference Number	WF0193
Type of Submission	Web submission
Full Name	MR JOHN GARNER
Organisation	
Address	60A VISTA ROAD NEWTON LE WILLOWS M;SIDE WA12 9ER
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	EQUAL OPPORTUNITIES LIMITATIONS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	INADEQUATE ROAD NETWORK & POLLUTION
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

A) LIMITED EMPLOYMENT OPPORTUNITIES FOR WOMEN...LOGISTICS LESS THAN 25% FEMALE EMPLOYEES

B) PLANNING GRANTED TO SITES IN ADVANCE OF INSPECTORATE CONSIDERATION E G P/2016/0608

C) EXISTING LOCAL PLAN ACCEPTED BY INSPECTORATE IGNORED (TO 2027) SO WHY BOTHER HAVING ANY PLAN RELATIVE TO REPRESENTATIONS AS SHMBC CAN SIMPLY OVERRIDE IT AT THEIR WHIM.

D) DESPITE IT BEING A HAVEN FOR RARE WILDLIFE AND CONTAINING ENGLISH CIVIL WAR LISTED BUILDINGS AND BATTLEFIELD THE OPPORTUNITY EXISTED FOR A UNIQUE COUNTRY/HERITAGE PARK FOR LOCALS AND VISITORS ALIKE. ASTONISHINGLY SHMBC BOUGHT THE LAND NOT FOR THE COMMON GOOD BUT A DEVELOPER USING PUBLIC MONIES (TOTAL LIABILITY SOME £ 6 MILLION) REPAYABLE WHEN THEY ARE FINANCIALLY ABLE TO DO SO. THUS A STATE OF "PREDETERMINATION" EXISTS CONTRARY TO PLANNING PROTOCOL.

7. Please set out modification(s) you consider are necessary

HIGHWAYS ENGLAND HAVE STATED THE LOCAL INFRA STRUCTURE CANNOT PRESENTLY SUPPORT INTENDED LOGISTIC DEVELOPMENT MORE SO AS THE INTENDED ADDED JUNCTION M6 NO 22 RELIES ON LOCAL B ROADS. IT CONFLICTS WITH EX WARRINGTON TRAFFIC TO THE A580, ALREADY A

SOURCE OF SUBSTANTIAL CONGESTION. IT ALSO INVOLVES TRAVERSING THE M6 BY A BRIDGE IN NEED OF COSTLY REPAIR . THIS BRIDGE CANNOT COPE WITH TWO HGVS AT ONE TIME. THIS WILL ENCOURAGE USE OF THE A49 BOTH NORTH AND SOUTH ADDING TO THE HIGH LEVELS OF AIR POLLUTION EXISTENT IN THE NEWTON AREA, APART FROM TOWN CENTRE IMPACT. THE ESTIMATED COST OF THIS ROAD IS £ 30 MILLION PLUS LAND COST. (UNDEFINED)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:42:22 AM
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PO0176

① - GEN ② - GEN

Representor Details

Web Reference Number	WF0193
Type of Submission	Web submission
Full Name	MR JOHN GARNER
Organisation	
Address	60A VISTA ROAD NEWTON LE WILLOWS M;SIDE WA12 9ER
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	EQUAL OPPORTUNITIES LIMITATIONS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	INADEQUATE ROAD NETWORK & POLLUTION
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

A) LIMITED EMPLOYMENT OPPORTUNITIES FOR WOMEN...LOGISTICS LESS THAN 25% FEMALE EMPLOYEES

B) PLANNING GRANTED TO SITES IN ADVANCE OF INSPECTORATE CONSIDERATION E G P/2016/0608

C) EXISTING LOCAL PLAN ACCEPTED BY INSPECTORATE IGNORED (TO 2027) SO WHY BOTHER HAVING ANY PLAN RELATIVE TO REPRESENTATIONS AS SHMBC CAN SIMPLY OVERRIDE IT AT THEIR WHIM.

D) DESPITE IT BEING A HAVEN FOR RARE WILDLIFE AND CONTAINING ENGLISH CIVIL WAR LISTED BUILDINGS AND BATTLEFIELD THE OPPORTUNITY EXISTED FOR A UNIQUE COUNTRY/HERITAGE PARK FOR LOCALS AND VISITORS ALIKE. ASTONISHINGLY SHMBC BOUGHT THE LAND NOT FOR THE COMMON GOOD BUT A DEVELOPER USING PUBLIC MONIES (TOTAL LIABILITY SOME £ 6 MILLION) REPAYABLE WHEN THEY ARE FINANCIALLY ABLE TO DO SO. THUS A STATE OF "PREDETERMINATION" EXISTS CONTRARY TO PLANNING PROTOCOL.

7. Please set out modification(s) you consider are necessary

HIGHWAYS ENGLAND HAVE STATED THE LOCAL INFRA STRUCTURE CANNOT PRESENTLY SUPPORT INTENDED LOGISTIC DEVELOPMENT MORE SO AS THE INTENDED ADDED JUNCTION M6 NO 22 RELIES ON LOCAL B ROADS. IT CONFLICTS WITH EX WARRINGTON TRAFFIC TO THE A580, ALREADY A

SOURCE OF SUBSTANTIAL CONGESTION. IT ALSO INVOLVES TRAVERSING THE M6 BY A BRIDGE IN NEED OF COSTLY REPAIR . THIS BRIDGE CANNOT COPE WITH TWO HGVS AT ONE TIME. THIS WILL ENCOURAGE USE OF THE A49 BOTH NORTH AND SOUTH ADDING TO THE HIGH LEVELS OF AIR POLLUTION EXISTENT IN THE NEWTON AREA, APART FROM TOWN CENTRE IMPACT. THE ESTIMATED COST OF THIS ROAD IS £ 30 MILLION PLUS LAND COST. (UNDEFINED)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:42:22 AM
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PO0177

① - LPAOS

② - GEN

Representor Details

Web Reference Number	WF0198
Type of Submission	Web submission
Full Name	Mr Anthony Cowley
Organisation	
Address	31 Inglewood Rd Rainford WA11 7QL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HA
Paragraph / diagram / table	all the plan
Policies Map	see notes
Sustainability Appraisal / Strategic Environmental Assessment	fails to take account of what will happen with Brexit and the need to feed ourselves in the future, The use for Rookery lane and higher lane is a big mistake.
Habitats Regulation Assessment	No consideration to the environment, the wildlife. Think about our children and their future of the damage this will do to their health and wellbeing.
Other documents	The total plan has been forced on the community without working things out. Use brownfield sites and not our greenbelt land.

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The Inspector cannot be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy. its been done to satisfy the pressure of the UK government to, build houses on any greenbelt location, to generate money to fund the local councils for whilst this government squanders our taxes. To Build affordable houses is a nonsense, look about, they build houses at a cost that no one can afford except the rich.

7. Please set out modification(s) you consider are necessary

Scrap it, it is not needed and and set on costs that do not add up.

Look at local traffic now, within our area, it takes hours to just move a few miles down the rainford bypass and what would that be like with another x thousand houses built.

Look at the local Ambulance service [REDACTED] we cant cover Rainford now and don't forget seconds save lives. Not enough doctors, not enough Hospitals. The only A&E is Whiston Hospital, just imagine trying to get a cardiac arrest through the extra traffic and to deal with such an increase in the number of houses.

Who ever thought this out, should be dismissed for incompetence in putting lives at risk. Think of the toxic fumes this will increase, what is that going to do for the UK plan on greenhouse gases? On every front, the idea of increasing houses round this region has been totally misread. There is not, the population explosion that they are indicating.

When we leave the EU, what and where are we going to get our food from? Use the green belt land and make it so we are not held to ransom by the EU in future.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 10:24:01 PM
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PO0178

Representor Details

Web Reference Number	WF0199
Type of Submission	Web submission
Full Name	Mr Jenny Moxon
Organisation	
Address	26 Spinney Green WA105AH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology.

The plan is not deliverable

If does not comply to NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 9:24:29 PM
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PO0179

Representor Details

Web Reference Number	WF0200
Type of Submission	Web submission
Full Name	Mr Steve Moxon
Organisation	
Address	26 Spinney Green WA105AH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology.

The plan is not deliverable

If does not comply to NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 9:23:21 PM
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PO0180

Representor Details

Web Reference Number	WF0214
Type of Submission	Web submission
Full Name	Mr Sean Hollowed
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
No

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:
Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:13:49 PM
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PO0181

Representor Details

Web Reference Number	WF0215
Type of Submission	Web submission
Full Name	Miss Jane Wilcock
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:04:41 PM
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PO0182

Representor Details

Web Reference Number	WF0217
Type of Submission	Web submission
Full Name	Mr Craig Cooney
Organisation	
Address	44 Crawford street Clock face St Helens Wa94xh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

No notification to local residents by letter.

No public notification.

No regard for local wildlife.

Doesn't comply with green belt legislation.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:02:03 PM
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PO0183

Representor Details

Web Reference Number	WF0239
Type of Submission	Web submission
Full Name	Mr Peter Boyce
Organisation	N/A
Address	23 Holford Way Bridge Park Newton-le-Willows WA12 0BZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Local Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**7. Please set out modification(s) you consider are necessary**

There is insufficient consideration as to the effect of new buildings on both the existing infrastructure and air quality at the very least. This must contradict the guidelines set out in Government Policies.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 7:04:49 PM
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PO0184

①-LPA05 ②-GEN ③-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0253
Type of Submission	Web submission
Full Name	Mrs Susan Mackenzie
Organisation	
Address	29 Seddon Close, St Helens Merseyside WA10 5AG
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

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should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 4:50:40 PM
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PO0185

① - GEN ② - LPAOS

Representor Details

Web Reference Number	WF0255
Type of Submission	Web submission
Full Name	Mrs Sharon Lawrenson
Organisation	Home
Address	12 Crawford street clockface St. Helens Wa94xq
Agent Details	None

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I think this Proposed project this housing scheme be illegal as there is plenty of wildlife including bats frogs and there is other wildlife which live on and around the surrounding fields Ov Crawford Street, We have had no verbal or written communication between the local residents and the council know council leaders Have bothered To turned up at the meeting which is to be honest Is a total joke you're playing around with peoples lives we bought these houses because of the tranquillity and peace and the greenbelt area when I bought this house I was told that the forestry commission owned these fields and there would be no building home for over 50 years The roads and the local amenities would not cope with what is going on on your building project peoples lives will be severely affected i objects to this project this is not fair that people have sent a list of the people of Warrington and omega

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①

②

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 3:42:02 PM
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PO0186

① - GEN ② - LPAOS

Representor Details

Web Reference Number	WF0256
Type of Submission	Web submission
Full Name	Mr Steven Lawrenson
Organisation	Home
Address	12 Crawford street clockface St. Helens Wa94xq
Agent Details	None

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I think this Proposed project this housing scheme be illegal as there is plenty of wildlife including bats frogs and there is other wildlife which live on and around the surrounding fields Ov Crawford Street, We have had no verbal or written communication between the local residents and the council know council leaders Have bothered To turned up at the meeting which is to be honest Is a total joke you're playing around with peoples lives we bought these houses because of the tranquillity and peace and the greenbelt area when I bought this house I was told that the forestry commission owned these fields and there would be no building home for over 50 years The roads and the local amenities would not cope with what is going on on your building project peoples lives will be severely affected i objects to this project this is not fair that people have sent a list of the people of Warrington and omega

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7. Please set out modification(s) you consider are necessary

Needs to have a positive tests on the wildlife protection local residents traffic and and roadways confirm with policies from St Helens Council

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 3:38:52 PM
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PO0187

Representor Details

Web Reference Number	WF0257
Type of Submission	Web submission
Full Name	Mrs Diana Collins
Organisation	
Address	8 Sandfield Rd., Eccleston WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan has been prepared using flawed methodology.

The plan is not deliverable.

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

This plan completely ignores the requirements of infrastructure. It cannot be delivered with out a huge investment in education and health. The needs of road- users can never be solved with the present situation at Windle Island nor will the East Lancs road be able to cope with the extra number of cars. This plan is totally flawed.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 3:10:39 PM
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PO0188

Representor Details

Web Reference Number	WF0258
Type of Submission	Web submission
Full Name	Mr Peter Collins
Organisation	
Address	8 Sandfield Rd., Eccleston WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology.

The plans for present infrastructure improvements, schools, doctors, police, fire and roads are to cope with the present number of houses. But will not cope with your proposals for further house building.

It dose not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

More schools, More doctors. Police, have not seen any for a long while. Better roads and parking enforcement. The plan is not deliverable without a huge investment. Windle lights improvement will once again be outdated and will need further work as it did before.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 2:59:17 PM
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PO0189

① - LPA05 ② - GEN ③ Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0263
Type of Submission	Web submission
Full Name	Mrs Clare Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Justified - No, the plan is based on flawed methodology

Effective - No the plan is not deliverable

Consistent with National Policy - No, it does not comply with NPPF 2018

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

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the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 1:28:27 PM
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PO0190

① - LPA05 ② - GEN ③ - Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0264
Type of Submission	Web submission
Full Name	Mr Stephen Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Justified - No the plan is based on flawed methodology

Effective - No, the plan is not deliverable

Consistent with national policy - No, it does not comply with NPPF 2018

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

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the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 1:22:41 PM
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PO0191

①-LPA05 ②-GEN ③-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0268
Type of Submission	Web submission
Full Name	Mrs Patricia Anne Fidler
Organisation	
Address	11 Marylebone Avenue St Helens WA9 5SZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package

includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities. There are excellent examples of this now. If this action is not taken it will leave large areas of the borough as barren, brownfield, deserted sites, whilst our beautiful green belt will be gone forever.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 12:45:58 PM
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PO0192

①-LPA05 ②-GGN ③Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0273
Type of Submission	Web submission
Full Name	Mr Stephen Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Wa10 5HN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

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should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 9:57:39 AM
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PO0193

① - LPA05 ② - Green Belt Review ③ - GEN

Representor Details

Web Reference Number	WF0275
Type of Submission	Web submission
Full Name	Dr Deborah Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Merseyside WA10 5HN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS\LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the Local Plan is unsound due to it being based on flawed historical data that does not justify the aspiration targets included in the plan.

The housing needs for the local area does not use standard Methodology and no case for exceptional circumstances has been made. Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

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The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

The increase in traffic proposed in the plan will have significant impact on air quality for the next generation. The access to local doctors is currently impossible and would be made much worse. the argument that more surgeries will open is not an adequate answer when GPs are retiring faster than being recruited or trained. There is no evidence of collaboration with the Hospital Trust, local CCGs or education Authorities. The Plan is not effective.

3

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 9:37:32 AM
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PO0194

①-LPA04 ②-LPA05 ③-LPA05, 8HA
 ④-GEN ⑤-Statement of Common Ground

Representor Details

Web Reference Number	WF0276
Type of Submission	Web submission
Full Name	Mrs Kathryn Spencer
Organisation	
Address	4 Queens Way Rainford St Helens Merseyside WA11 8EU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 10:21:59 PM
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PO0195

Representor Details

Web Reference Number	WF0277
Type of Submission	Web submission
Full Name	Mrs Victoria Whiteside
Organisation	
Address	3 Wareham Close Haydock Wa11 0wh
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Do you live in Haydock and have the daily battle to try to get your child to school and to work on time? Obviously no! Is your child an asthma sufferer and does pollution make it worse! . The brook is full of Japanese knot weed by the way!! You are destroying a decent bit of the town that is falling apart

7. Please set out modification(s) you consider are necessary

I haven't got a clue, but greed selfishness and clueless fine to mind

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 9:19:07 PM
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PO0196

- ①-LPA04 ②-LPA05 ③-LPA05, 8HA
④-GEN ⑤-Statement of Common Ground

Representor Details

Web Reference Number	WF0278
Type of Submission	Web submission
Full Name	Miss Christina Cook
Organisation	
Address	119 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	All of the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

• there are no exceptional circumstances to justify not using the standard method to calculate housing need

• the economic analysis is flawed and based on over-optimistic assumptions

• the level of land needed is therefore not as high as set out in the Local Plan

• therefore there are no exceptional circumstances to change Green belt boundaries

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

• these alternatives will have less impact on the environment and lead to less need for new infrastructure

• the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound.

②

①

②

⑤

②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 7:30:13 PM
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PO0197

- ①-LPA04 ②-LPA05 ③-LPA05, 8HA
④-GEN ⑤- Statement of Common Ground

Representor Details

Web Reference Number	WF0279
Type of Submission	Web submission
Full Name	Miss Rebecca Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Everything in the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

• there are no exceptional circumstances to justify not using the standard method to calculate housing need

• the economic analysis is flawed and based on over-optimistic assumptions

• the level of land needed is therefore not as high as set out in the Local Plan

• therefore there are no exceptional circumstances to change Green belt boundaries

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

• these alternatives will have less impact on the environment and lead to less need for new infrastructure

• the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound.

②

①

②

⑤

②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

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- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 7:25:22 PM
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PO0198

- ①-LPA04 ②-LPA05 ③-LPA05, 8HA
 ④-GEN ⑤-Statement of Common Ground

Representor Details

Web Reference Number	WF0280
Type of Submission	Web submission
Full Name	Miss Hollie Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

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- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
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- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 7:17:37 PM
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PO0199

- ① - LPA04 ② - LPA05 ③ - LPA05, 8HA
 ④ - GEN ⑤ - Statement of Common Ground

Representor Details

Web Reference Number	WF0281
Type of Submission	Web submission
Full Name	Mrs Jean Lamb
Organisation	
Address	13 Rookery Lane Rainford St Helens Merseyside WA11 8EE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
 Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Everything in the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope. There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

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- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 7:10:32 PM
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PO0200

① - LPA04 ② - LPA05 ③ - LPA05, 8HA
④ - GEN ⑤ - Statement of Common Ground

Representor Details

Web Reference Number	WF0282
Type of Submission	Web submission
Full Name	Mrs Jacqueline Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
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- 5) To allocate and make use of previously developed land.
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- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 7:01:53 PM
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PO0201

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0283
Type of Submission	Web submission
Full Name	Mr Zach Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical

③

①

- data that does not justify the aspirational targets included in the plan. ①
- Adequate regional and cross border collaboration has not been undertaken. ⑤
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
 - The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
 - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
 - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
 - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to ④

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:18:12 PM
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PO0202

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 17.2 OTC

Representor Details

Web Reference Number	WF0284
Type of Submission	Web submission
Full Name	Mr Evan Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

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- Adequate regional and cross border collaboration has not been undertaken. (5)
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. (2)
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. (3)
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) (4)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:13:25 PM
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PO0203

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 17.2 DTC

Representor Details

Web Reference Number	WF0285
Type of Submission	Web submission
Full Name	Ms Fiona Meli
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:08:57 PM
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PO0204

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 17.2 OTC

Representor Details

Web Reference Number	WF0286
Type of Submission	Web submission
Full Name	Ms Clare Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

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- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

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- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:03:36 PM
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PO0205

① - LPA04 ② - LPA05 ③ - GEN
④ - IDP ⑤ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0287
Type of Submission	Web submission
Full Name	Ms Sarah-Jane Howitt
Organisation	
Address	17 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe that this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

The following fundamental elements of the plan remain questionable:

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
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- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. ②
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 5:44:22 PM
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PO0206

① - LPA04 ② - LPA05 ③ - GEN
④ - IDP ⑤ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0289
Type of Submission	Web submission
Full Name	Ms Claire Tyrrell
Organisation	
Address	17 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 5:36:51 PM
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PO0207

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0291
Type of Submission	Web submission
Full Name	Mrs Catherine Fox-smith
Organisation	
Address	4 Rutherford Road WINDLE St. Helens Wa106HJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Does not satisfy requirement for sustainable development. It is based on flawed methodology. The plan is not deliverable. The plan does not comply with NPPF 2018. Does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs. Does not satisfy sustainable housing, targets proposed are based on aspiration employment growth predictions. Food security by ignoring agricultural land quality. Latest estimate produced by ONS (2016) predicts that 383 houses per year will be required to meet housing needs in St. Helens yet the council are using 2014 statistics of 486 questioning their regard for upto date information. The area already has significant issues at windle island, bleak hill road however the plan does not outline how any improvement will be made or funded to improve this prior to increase the amount of traffic flow in the area. The lack of infrastructure and poor education offer means that St. Helens is currently not a desirable place to live. This plan does not address any of this but instead focuses on house building and low skilled employment. The problems is exacerbated by allocating green belt for housing in areas where there is a lack of infrastructure and the houses will not meet the housing need. The plan is not effective and does not consider local people's opinions instead the comments of developers who do not live in the area or will be affected by any of these issues identified. The

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people making these decisions will not be living with the repercussions of this development it will be the current residents of the local area.

7. Please set out modification(s) you consider are necessary

Retain all green belt areas for the future of our communities.

Redevelop brownfield sites it can be done as there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even with ongoing ones now. If this is not done we will end up with brownfield sites deserted and greenbelt used for house for the benefit of housebuilders and the council wanting to make profit rather than rejuvenating existing brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 4:22:04 PM
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PO0208

①-LPA05 ②-GEN

Representor Details

Web Reference Number	WF0292
Type of Submission	Web submission
Full Name	Mrs Catherine Fox-smith
Organisation	
Address	4 Rutherford Road WINDLE St. Helens Wa106HJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Does not satisfy requirement for sustainable development. It is based on flawed methodology. The plan is not deliverable. The plan does not comply with NPPF 2018. Does not satisfy the criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs.

Does not satisfy sustainable housing, targets proposed are based on aspiration employment growth predictions. Food security by ignoring agricultural land quality. Latest estimate produced by ONS (2016) predicts that 383 houses per year will be required to meet housing needs in St. Helens yet the council are using 2014 statistics of 486 questioning their regard for upto date information.

The area already has significant issues at windle island, bleak hill road however the plan does not outline how any improvement will be made or funded to improve this prior to increase the amount of traffic flow in the area.

The lack of infrastructure and poor education offer means that St. Helens is currently not a desirable place to live. This plan does not address any of this but instead focuses on house building and low skilled employment. The problems is exacerbated by allocating green belt for housing in areas where there is a lack of infrastructure and the houses will not meet the housing need.

The plan is not effective and does not consider local people's opinions instead the comments of developers who do not live in the area or will be affected by any of these issues identified. The

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people making these decisions will not be living with the repercussions of this development it will be the current residents of the local area.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 4:18:25 PM
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PO0209

① - LPA04 ② - LPA05 ③ - LPA05, 8HA
 ④ - GEN ⑤ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0293
Type of Submission	Web submission
Full Name	Mr Ian Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens WA11 8BQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	The entire Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Generally and in relation to the overall figures and projections contained in the Plan:

• there are no exceptional circumstances to justify not using the standard method to calculate housing need _____ ②

• the economic analysis is flawed and based on over-optimistic assumptions _____ ①

• the level of land needed is therefore not as high as set out in the Local Plan _____

• therefore there are no exceptional circumstances to change Green belt boundaries _____ ②

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land _____

• these alternatives will have less impact on the environment and lead to less need for new infrastructure _____

• the Council have failed to co-operate with other councils and have not published any statement(s) of common ground _____ ⑤

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. _____ ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future. _____ ④

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope. There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

7. Please set out modification(s) you consider are necessary

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 3:58:25 PM
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PO0210

①-LPA05 ②-LPA06, 8HS ③-GEN

Representor Details

Web Reference Number	WF0295
Type of Submission	Web submission
Full Name	Mr Liam Keenaghan
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- The Green Belt Review (2018) contains questionable decisions. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land.
- Sustainable infrastructure has not been addressed and will cause problems if site 8HS is allowed to be safeguarded for development. The decision to include this parcel in the Plan leads to significant doubt that the Plan has been positively prepared.
- St Helens Council has used ONS(2014) statistics rather than later and more accurate ONS(2016) data. The Council are aware of this reduction in housing need but still chooses to uplift older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the need to build on Green Belt.
- The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). St Helens Council states that 3,170 ha of the lowest priority contaminated brownfield land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites, barely 7% of the 3,170-ha available. There is little justifiable need to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. It is not reasonable to assume that sites cannot be made available within the 15- year Plan period being considered.

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- The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered. The Plan is not justified.

- The lack of infrastructure and the poor healthcare and education offering means that St Helens is a less desirable place to live and work. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites. If this action is not taken it will leave large areas of the borough as barren, brownfield deserted sites, whilst our beautiful green belt will be gone.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 2:10:35 PM
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PO0211

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0297
Type of Submission	Web submission
Full Name	Mrs Andrea Cryan
Organisation	
Address	1&2 Gillars Green Cottages Burrows Lane St. Helens WA10 5PW
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I feel that it does not satisfy the requirement for sustainable development. I do not believe that it is effective use of land by concentrating on green space development over town centre development. I further believe that it puts in jeopardy our food security by ignoring agricultural land quality. The plan promotes our ever increasing dependency on car transport by building further away from transport hubs.

The plan makes no mention of brownfield and previously developed land that is not (yet) available or included on the Brownfield Register. Nor is there any mention of development of contaminated land sites that exist in St. Helens and in 2015 the St Helens Council stated that there was 3170ha of contaminated land that I feel should be prioritized over green belt land. Our Council in conjunction with other local councils should be planning together to first use all brown field and contaminated sites before they destroy any more of our precious green belt land.

This plan does not consider the sustainability of local services, road networks, health services, schools, policing and public transport - none of which can support a development of this size.

I do not believe the plan to be effective.

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7. Please set out modification(s) you consider are necessary

I think all green belt areas should be taken out of the plan and saved for future generations to enjoy. I think that brown field sites should be regenerated before incurring the loss of any more green field land.

I think that the housebuilders should be made to pay to clean up any contaminated land and use that in preference to any loss of green field sites. They make handsome profits so let them use some of these to benefit our communities.

I think that with any regeneration of any area then the Council should be making plans to improve the infrastructure of such sites not just for now but for the future of this town. If you build houses then they need roads, schools, medical centres etc to cope with the influx of residents and vehicles. I think that the plan in its current form is very short sighted.

I would also like it noted that I feel that this process has been far too complicated for members of the public to give their views. The drop in meetings seem to have been manned by people who couldn't answer questions posed and this form is far too complex. It would appear that the council don't really want to hear the genuine views of the public.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/8/2019 5:00:24 PM
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PO0212

① - LPA04 ② - LPA05 ③ - GGN
 ④ - IDP ⑤ - Para 17.2 DTC

Representor Details

Web Reference Number	WF0351
Type of Submission	Web submission
Full Name	Mr Trevor Gregory
Organisation	
Address	16A Brooklands Road Eccleston St Helens WA10 5HF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Greenbelt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe that this version does not satisfy:

- 1) the requirement for Sustainable development
- 2) the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs
- 3) sustainable housing, targets proposed are based on aspirational employment growth predictions
- 4) effective land use by concentrating on Green Space development over town centre development with higher densities
- 5) food security by ignoring Agricultural Land Quality

In addition, the following fundamental elements of the Plan remain questionable:

- 1) Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan
- 2) Adequate regional and cross border collaboration has not been undertaken
- 3) The Housing Need assessment does not use Standard Methodology and no case for exceptional circumstances has been made
- 4) The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486

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- 5) The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not yet available or included on the Brownfield Register
- 6) The St Helens Council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3170 ha available, if it were to be remediated
- 7) The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered
- 8) The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered
- 9) The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- 10) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquility and general health. It does not promote less vehicle dependency with it's proposals for edge of town developments
- 11) The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 4:00:56 PM
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PO0213

Representor Details

Web Reference Number	WF0356
Type of Submission	Web submission
Full Name	Miss Victoria Scott
Organisation	
Address	Clay Barn Clay Lane Eccleston WA10 5PX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	ECRA & Windle
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Plan is based on flawed methodology

The plan is not deliverable

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:26:38 PM
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PO0214

Representor Details

Web Reference Number	WF0357
Type of Submission	Web submission
Full Name	Mr Philip Scott
Organisation	
Address	Clay Lane Farm Clay Lane Eccleston WA10 5PX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Ecra & Windle
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology

The plan is not deliverable

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:22:55 PM
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PO0215

Representor Details

Web Reference Number	WF0358
Type of Submission	Web submission
Full Name	Mrs Christine Scott
Organisation	
Address	Clay Lane Farm Clay Lane Eccleston WA10 5PX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology

The plan is not deliverable

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:14:41 PM
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PO0216

Representor Details

Web Reference Number	WF0359
Type of Submission	Web submission
Full Name	Mr Timothy Scott
Organisation	
Address	Clay Barn Clay Lane Eccleston WA10 5PX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	ECRA & Windle
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology

The plan is not deliverable

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:07:26 PM
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PO0217

Representor Details

Web Reference Number	WF0360
Type of Submission	Web submission
Full Name	Mrs Christina Scott
Organisation	
Address	Clay Barn Clay Lane Eccleston WA10 5PX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	ECRA & Windle
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based on flawed methodology.

The plan is not deliverable.

It does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:02:40 PM
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PO0218

①-LPA04 ②-LPA05 ③-GEN ④- Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0373
Type of Submission	Web submission
Full Name	Mr. Robert Stock
Organisation	
Address	16 Lynton Way, Windle, St. Helens, Merseyside, WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Objective of the Local Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan has been devised with the intention of achieving as much Council Tax income as is possible from house building. This has been stated in public arenas by St. Helens Council. The predetermined employment growth is calculated based on unreasonable assumptions with little evidence to support them. And it is these aspirational figures and the use of "out of date" data, which brings about a greater housing requirement than is actually needed. A better and more realistic Local Plan would have been achieved, had the figures used been based on the ONS(2018), which uses more current information. Hence, the Local Plan is not positively prepared. St. Helens Borough has sufficient Brownfield and Contaminated land which could quite easily meet housing requirements. While St. Helens Council may not currently have funding to de-contaminate some of the contaminated sites, this will not always be the case, especially when taken over a 15-30-year time frame. The removal of land from the Green Belt therefore cannot be justified. Hence, The Local Plan is not justified.

The Local Plan is weak on infrastructure planning and does not adequately address major transport problems which are already apparent, and which will worsen still further as the Liverpool City Region

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Development comes more into being. Also, there is little on how school and medical facility shortages, are to be addressed. Hence, the Local Plan is not effective. ③

The Local Plan cannot be said to be current, since it does not use the most current data or current national planning framework. I would have more confidence in the Local Plan if (1) it complied with NPPF(2018), and (2) it used the more accurate and up-to-date housing and employment statistics in ONS(2018). Other Authorities round and about St. Helens Borough are also producing Local Plans which are over stating housing requirements, demonstrating a failure to cooperate. Hence, the Local Plan is not consistent with current national policy. ④

7. Please set out modification(s) you consider are necessary

Make the Local Plan more representative of current knowledge and data by adopting the ONS(2018) report on employment and housing statistics, Thereby eliminating the need in this Local Plan to reallocate land from the Green Belt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 4:10:51 AM
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PO0219

①-LPA06 ②-GEN

Representor Details

Web Reference Number	WF0377
Type of Submission	Web submission
Full Name	Mrs Karen Holmes
Organisation	
Address	50 Lester Drive, Eccleston WA10 5ES
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This is a considerable amount of new properties which is not needed in this area. I assume the council thinks all this new housing is needed because of an increase in population then why build on the green belt, surely it makes sense to keep these fields for food, it's no good having a nice house but living in a country that cannot feed you due to all the farm land they have built houses on. We will end up having to import more and more, we need to be more self sufficient. We are all concerned about pollution on the environment so let St Helens be the first and keep our green belt that will reduce the impact on the environment. You need to clean up and make new All contaminated sites, making this town more pleasing on the eye.

If you don't live near the east lincs road then you don't know the problems that occurs with all the traffic. By increasing the population it will increase the traffic three fold, so what will your solution be- make the road a motor way with 3 - 4 lanes each side, more impact on the environment. This will have a huge impact on the mental health of the residents who already live here, the open space and fields gives you places to walk and breath and a sense of space. You need to drive around liverpool and see how claustrophobic it is, houses, estates, factories, roads, noise, pollution and people having no sense of space, please don't force this on to the people of St, Helens. Yes we all need a nice house to live in but above that the environment and people's well being needs to be put first. We have a shortage of facilities in this borough, not enough doctors, hospitals, schools, our transport isn't that efficient either. More houses, more people means much more problems.

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7. Please set out modification(s) you consider are necessary

I have already suggested, all existing brown and contaminated sites should be used. Using this method of building new properties should be priority. Lots of run down buildings should be made into homes. Let's put people first not targets. We need lots of open space, come up with new innovative ideas, make St. Helens a nice place to live not a concrete, claustrophobic jungle. Please don't make the same mistake you made with the town centre, encouraging the shops to move on to retail parks, make use of what we already have should be priority. Large housing estates breed problems, you only have one chance to get this right, listen to the people they live here.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I feel so strongly about the town I live in and the people. I want what's best, not something the government says you should be doing. As we know at the moment our government is not capable of governing.

Response Date	3/3/2019 5:09:28 PM
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PO0220

①-LPA04 ②-LPA05 ③-GEN ④-Para 17.2 OTC

Representor Details

Web Reference Number	WF0381
Type of Submission	Web submission
Full Name	Mr Alastair Rooke
Organisation	
Address	10 Ansdell drive Eccleston St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

The housing need assessment does not use standard methodology, and no case for exceptional circumstances has been made.

The plan makes no mention of brownfield and previously developed land that is not available or included on the brownfield register.

Adequate regional and cross border collaboration has not been undertaken.

The loss of grade 1 and 2 agricultural land that comprises most allocated and safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The increase in traffic proposed in the plan will have a significant impact on air-quality, noise, tranquillity and general health.

7. Please set out modification(s) you consider are necessary

Retaining all Green belt areas for the future of our children must be put above greed and money.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 4:29:37 PM
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PO0221

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0382
Type of Submission	Web submission
Full Name	Mr derek barrow
Organisation	Mr
Address	94 Kiln Lane Eccleston wa10 4rj
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

the plan would be better served by town centre development with high densities thereby reducing car dependency from outskirts. employment is reducing in this town so extra housing is not sustainable. you are ignoring agricultural land needed for food crops. later forecasts of housing needs(ONS2016) could be accomodated by cleaned up brownfield sites. there will be horrendous traffic growth affecting air quality and road safety issues. overall it will not satisfy NPPF(2018)

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7. Please set out modification(s) you consider are necessary

the current plan should be abandoned and rethought giving consideration to my points at Q6.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 4:13:48 PM
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PO0222

① - LPAOS ② - GEN ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0383
Type of Submission	Web submission
Full Name	Mrs Audrey Rooke
Organisation	
Address	18 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 3:53:17 PM
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PO0223

① LPA06.8HS

② -LPA06, 8HS

③ - GEN

Representor Details

Web Reference Number	WF0387
Type of Submission	Web submission
Full Name	Miss Abigail Johnson
Organisation	
Address	15 Crantock Grove Windle St Helens WA10 6EJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	resident and their concern?

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am writing this letter to further outline my concerns if the land labelled as 8HS within 'the local plan' continues to be NOT FULLY PROTECTED FROM ALL FUTURE DEVELOPMENTS. The recent change of status to 'safeguarded' is a real positive for my local area, as all of us local residents feel our voices have been listened to.

As I write this 2nd letter of concern, to ask that this 8HS land is now TOTALLY REMOVED FROM 'THE LOCAL PLAN' and is now NOT termed or recognised as 'safeguarded FOR future development', this NEEDS TO BE CHANGED TO 'SAFEGUARDED FROM ALL FUTURE DEVELOPMENTS' and left as a price of green belt land, with NO changes made to it all, ever.

Since I wrote my previous letter to yourselves, personally I would say that I have experiences an increase in traffic during my daily commute to and from work. During peak times, driving down the East Lancashire Road (A580), now that the Florida Farm land is being developed for warehouses, this has caused a lot more cars to be on these local roads. This is a concern for all of us that use this route, as this will only get worse, especially once June '19 arrives when these warehouses open for business and the staff also need to drive to them and also the customers of these newly created business opportunities.

If 1000 new houses will be built on the 8HS land, so close to these new warehouses / employment opportunities, even more people will need to use already busy local roads around the St Helens area

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to get to them, especially the A570/A580. As most people who will live in these potential new houses to be built on 8HS, will probably commute out of town to places of work, as employment opportunities are quite low at the moment within St Helens, it will just create many gridlocked roads.

As a resident of Windle, close to the 8HS land, I watch every year how this land is regularly farmed and uses as a profit-making opportunity by the farmer. There is wheat and vegetables grown on the land every year and this land is clearly still sustainable and somewhere local produce is being farmed – something which may become a rarity post-Brexit!! This land is never left untouched from year-to-year by the farmer and so it makes no sense at all to remove this greenbelt land from our town for these unnecessary houses.

As a society we are constantly reminded to be environmentally friendly and concerned about our carbon footprint and climate change, I do not know how any further developments of 8HS could possibly be justified? By actively encouraging an extra (potential) 2000 cars to be parked up on this new estate, in this town and for all of the extra environmental damage, noise and air pollution created by them, I am asking you, our town council, to think of the future of our town and its residents. We all want to live in an unpolluted and green town, instead of an urbanised and built-up area with no actual land that has not been concreted over or built on for even more housing estates- with no residents who want to move there and live in them.

General attitudes to this uncertainty for 8HS and the fact it is not totally safeguarded from future development is a real concern for the people of Windle and Eccleston as there are already other future developments to take place within 'the local plan', which will also produce extra traffic and pollution across this town. To add even more of these developments to another area of town just seems future madness in my opinion.

Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

7. Please set out modification(s) you consider are necessary

I am writing this letter to further outline my concerns if the land labelled as 8HS within 'the local plan' continues to be NOT FULLY PROTECTED FROM ALL FUTURE DEVELOPMENTS. The recent change of status to 'safeguarded' is a real positive for my local area, as all of us local residents feel our voices have been listened to.

As I write this 2nd letter of concern, to ask that this 8HS land is now TOTALLY REMOVED FROM 'THE LOCAL PLAN' and is now NOT termed or recognised as 'safeguarded FOR future development', this NEEDS TO BE CHANGED TO 'SAFEGUARDED FROM ALL FUTURE DEVELOPMENTS' and left as a price of green belt land, with NO changes made to it all, ever.

Since I wrote my previous letter to yourselves, personally I would say that I have experiences an increase in traffic during my daily commute to and from work. During peak times, driving down the East Lancashire Road (A580), now that the Florida Farm land is being developed for warehouses, this has caused a lot more cars to be on these local roads. This is a concern for all of us that use this route, as this will only get worse, especially once June '19 arrives when these warehouses open for business and the staff also need to drive to them and also the customers of these newly created business opportunities.

If 1000 new houses will be built on the 8HS land, so close to these new warehouses / employment opportunities, even more people will need to use already busy local roads around the St Helens area to get to them, especially the A570/A580. As most people who will live in these potential new houses to be built on 8HS, will probably commute out of town to places of work, as employment opportunities are quite low at the moment within St Helens, it will just create many gridlocked roads.

As a resident of Windle, close to the 8HS land, I watch every year how this land is regularly farmed and uses as a profit-making opportunity by the farmer. There is wheat and vegetables grown on the

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land every year and this land is clearly still sustainable and somewhere local produce is being farmed – something which may become a rarity post-Brexit!! This land is never left untouched from year-to-year by the farmer and so it makes no sense at all to remove this greenbelt land from our town for these unnecessary houses.

As a society we are constantly reminded to be environmentally friendly and concerned about our carbon footprint and climate change, I do not know how any further developments of 8HS could possibly be justified? By actively encouraging an extra (potential) 2000 cars to be parked up on this new estate, in this town and for all of the extra environmental damage, noise and air pollution created by them, I am asking you, our town council, to think of the future of our town and its residents. We all want to live in an unpolluted and green town, instead of an urbanised and built-up area with no actual land that has not been concreted over or built on for even more housing estates- with no residents who want to move there and live in them.

General attitudes to this uncertainty for 8HS and the fact it is not totally safeguarded from future development is a real concern for the people of Windle and Eccleston as there are already other future developments to take place within 'the local plan', which will also produce extra traffic and pollution across this town. To add even more of these developments to another area of town just seems future madness in my opinion.

Please add my concerns and negative opinions to those of the other residents from all over St Helens town, who are in general disagreement with 'the local plan'.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 10:33:02 AM
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PO0224

①-LPA04 ②-LPA05 ③- GEN
④-IDP ⑤- Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0388
Type of Submission	Web submission
Full Name	Mr John McKeon
Organisation	Mr
Address	3 Windlebrook Crescent Windle WA10 6DY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is: based on flawed methodology; not deliverable and does not comply with NPPF 2018.

Also, the plan does not satisfy :

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 10:06:47 AM
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PO0225

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0395
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mrs Patricia McLoughlin 3b Sadlers Lane Rainford St. Helens, WA11 7HT

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

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• The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

• The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

• The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

• The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

• The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

• The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

• The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/2/2019 1:22:19 PM

PO0226

① - LPA05 ② - GEN ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0396
Type of Submission	Web submission
Full Name	Mr Peter Williams
Organisation	
Address	26 Prestbury Drive Eccleston St Helens WA10 5RA
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is not positively prepared as:

1. St Helens Council has used the ONS(2014) statistics and not the more recent and more accurate, statistics ONS(2016) which are available. The later statistics suggest that there is a reduction in housing needs. The Council must be aware of the reduced needs but still choose to use the older figures, resulting in unnecessarily high housing targets. Changing the plan to use the latest figures would reduce the requirement for building on Green Belt.

2. There has been inadequate regional & cross border collaboration with adjacent authorities, in particular with regard to on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road. These developments all dependent on road freight. When combined with the additional local traffic directly from a large residential development, as proposed by The Plan, this already busy & hazardous trunk road would undoubtedly have an undesirable impact along with an increased risk of accidents.

3. The Plan is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the

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needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed.

The plan is not justified as:

The Plan neglects to consider reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If only 7% of this land was considered for remediation there would be no need to consider use of green belt land.

The plan is not effective as:

The local plan does not offer evidence that effective joint working on regional or cross boundary strategic matters have been dealt with. Also, no plan can be effective if it is incomplete - The Plan does not address the lack of infrastructure and the poor education on offer in St Helens and concentrates, instead, on house building and low skilled employment. Allocating Green Belt for housing without addressing the additional infrastructure needs will only make the situation worse. In addition, the type of houses built will, in all likelihood, not meet the housing needs of in St Helens.

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety.

7. Please set out modification(s) you consider are necessary

1. The plan should be based on the more recent and more accurate, statistics ONS(2016) which are available.
2. The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with Central Government and the developers who will make extensive financial gains.
3. All infrastructure needs should be addressed comprehensively by the plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/1/2019 6:15:39 PM
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PO0227

①-LPA05 ②-GEN

Representor Details

Web Reference Number	WF0397
Type of Submission	Web submission
Full Name	Mr Raymond Smith
Organisation	
Address	22, Queens Drive, Windle, St. Helens, Merseyside, WA10 6HF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There is adequate brownfield land to provide additional housing. This is farmland which will be needed in future. Health & education services are already overstretched. There is little public transport in the area and existing roads will be unable to cope with traffic from all the warehouses being built. Air quality, health and tranquillity will be ruined by more cars being on the roads. Forecast housing needs are overstated by 30%.

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7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/1/2019 12:55:27 PM
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PO0228

Representor Details

Web Reference Number	WF0398
Type of Submission	Web submission
Full Name	Mr Stephen Molyneux
Organisation	N/A
Address	44 Pinfold Drive Eccleston WA10 5BT
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is based upon flawed methodology

The plan is not deliverable

Oy does not comply with NPPF 2018

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/1/2019 10:59:04 AM
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PO0229

①-LPA05 ②-GEN ③-IDP ④-Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0400
Type of Submission	Web submission
Full Name	Mrs Alison Williams
Organisation	
Address	26 Prestbury Drive WA10 5RA
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LpA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is not positively prepared as:

1. it fails to meet the area's objectively assessed needs as the council has used ONS figures from 2014 when more current forecasts have been published (ONS, 2016) ①

2. it has not been informed by agreements with other authorities as there has been inadequate regional & cross border collaboration eg the recent & on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road, all dependent on road freight, then proposing the addition of local traffic directly from a large residential development to this already busy & hazardous trunk road which would surely increase risk of accidents in terms of both likelihood & impact. ②

3. it is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed. ③

The plan is not justified as:

The Plan is not an appropriate strategy, as it neglects reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If ④

only 7% of this land was considered for remediation there would be no need to consider use of green belt land. ①

The plan is not effective as:

The local plan doesn't appear to provide evidence of effective joint working on regional or cross boundary strategic matters that have been dealt with rather than deferred or any statement of common ground. Furthermore, no plan can be effective if it is incomplete. The infrastructure delivery plan fails to provide an adequate explanation of the impact on Health & Social Care, Education or other community statutory services, let alone making provision for managing these requirements. ④ ③

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety. ①

7. Please set out modification(s) you consider are necessary

The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with the developers who are set to make extensive financial gains.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/28/2019 8:50:37 PM
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PO0230

①-LPA05 ②-LPA06, 8HS ③-GEN ④-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0451
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

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③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

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①

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③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

①

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

③

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.
NB: I submitted the above form on 22nd Feb 2019, but I did not receive an acknowledgement, so I have re-submitted today, in case the one from 22nd was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:52:37 AM
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PO0231

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0452
Type of Submission	Web submission
Full Name	Mrs William Clarey
Organisation	Private householder
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

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①

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③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

①

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

③

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:46:41 AM
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PO0232

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0453
Type of Submission	Web submission
Full Name	Mrs Helen Clarey
Organisation	Private Householder
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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②

①

③

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②

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①

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③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

②

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

③

7. Please set out modification(s) you consider are necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:41:44 AM
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PO0233

① - LPA05 ② LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0462
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

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②

①

③

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②

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②

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③

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Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather rejuvenating brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/22/2019 9:08:16 AM
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PO0234

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0463
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston ST. HELENS Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. ④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. ①

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. ③

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

2/22/2019 8:48:05 AM

PO0235

①-LPAOS ②-GEN

Representor Details

Web Reference Number	WF0464
Type of Submission	Web submission
Full Name	mr ron williams
Organisation	
Address	80 ecclesfield rd eccleston st.helens wa10 5nd
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

7. Please set out modification(s) you consider are necessary

i believe the plan does not satisfy;

- the requirement for sustainable development
- the criteria for sustainable transport as the plan promotes increase car dependency remote from transport hubs
- sustainable housing, targets proposed are based on aspirational employment growth predictions
- effective land use by concentrating on Green space development over town centre development with higher densities
- food security by ignoring Agricultural Land Quality

②

①

②

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/21/2019 5:55:10 PM
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PO0236

① - LPAOS ② - GEN

Representor Details

Web Reference Number	WF0465
Type of Submission	Web submission
Full Name	Mr Gerard Kelly
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPSD
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

ECRA with Windle believe that this version does not satisfy:

the requirement for sustainable development _____ ①

the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. _____ ②

sustainable housing, targets proposed are based on aspirational employment growth predictions. _____ ①

effective land use by concentrating on Green space development over town centre development with higher densities. _____ ①

food security by ignoring Agricultural Land Quality. _____ ②

7. Please set out modification(s) you consider are necessary

The Borough has significant long term and intractable problems at Windle Island, bleak hill road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Plan appears to promote unsustainable traffic growth and a return to traffic levels on the A580 before the M62 was opened. People will not want to live here as services will not be able to cope and the impact on air-quality, noise, tranquillity and general health for both young and old will suffer as farming land will be replaced by even more houses.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/21/2019 4:30:25 PM
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PO0237

① - LPA05 ② - GEN

③ - Para 172 etc

Representor Details

Web Reference Number	WF0467
Type of Submission	Web submission
Full Name	Mrs Carol Howard
Organisation	
Address	3 Melrose Avenue Eccleston St Helens WA10 5PQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA 05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not satisfy the requirement for Sustainable development or the criteria for Sustainable transport. Nor does it satisfy sustainable housing, targets proposed are based on inflated employment growth predictions. Effective land use is not being considered as town centre development would benefit the area more than building on Green Space. Agricultural Land Quality is being ignored so food security is not satisfied. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact of farming and distribution jobs has not been considered. Adequate regional and cross border collaboration has not been undertaken. Our local infrastructure is already struggling to cope with traffic. Air quality, noise and tranquillity and general health will be impacted by increased traffic. Commuting to Manchester from Eccleston takes upwards of 90 minutes in rush hour traffic already, whether by the A580 or M6/M62. Windle Island cannot cope with more traffic. Houghtons Lane has been ripped up by vehicles using the road as a cut through and our council is already struggling to repair potholes in a timely manner. Healthcare and Education will also struggle to cope with a higher population.

7. Please set out modification(s) you consider are necessary

A brownfield first approach must be fully adopted. No Green Belt land should even be considered until every available brownfield site has been identified and built upon. Contaminated land should

be cleaned up, regenerating, revitalising and improving the local environment within our town. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered. Lots of shops in our town centre are now empty. Could they be redeveloped for housing rather than being left to deteriorate?

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/21/2019 10:02:52 AM
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PO0238

①-LPA05 ②-GEN ③-Para 17.2 DTC

Representor Details

Web Reference Number	WF0468
Type of Submission	Web submission
Full Name	Mr. Ray Howard
Organisation	
Address	3 Melrose Avenue Eccleston St Helens WA10 5PQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA 05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not satisfy the requirement for Sustainable development or the criteria for Sustainable transport. Nor does it satisfy sustainable housing, targets proposed are based on inflated employment growth predictions. Effective land use is not being considered as town centre development would benefit the area more than building on Green Space. Agricultural Land Quality is being ignored so food security is not satisfied. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact of farming and distribution jobs has not been considered. Adequate regional and cross border collaboration has not been undertaken. Our local infrastructure is already struggling to cope with traffic. Air quality, noise and tranquillity and general health will be impacted by increased traffic. Commuting to Manchester from Eccleston takes upwards of 90 minutes in rush hour traffic already, whether by the A580 or M6/M62. Windle Island cannot cope with more traffic. Houghtons Lane has been ripped up by vehicles using the road as a cut through and our council is already struggling to repair potholes in a timely manner. Healthcare and Education will also struggle to cope with a higher population.

7. Please set out modification(s) you consider are necessary

A brownfield first approach must be fully adopted. No Green Belt land should even be considered until every available brownfield site has been identified and built upon. Contaminated land should

①
②
①
②
③
②

be cleaned up, regenerating, revitalising and improving the local environment within our town. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered. Lots of shops in our town centre are now empty. Could they be redeveloped for housing rather than being left to deteriorate?

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/21/2019 10:00:09 AM
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PO0239

①-LPA05

②-LPA06

③-GEN

Representor Details

Web Reference Number	WF0474
Type of Submission	Web submission
Full Name	The Hon Edward Mercer
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Monday 18 February 2019

Local Plan Preferred Options Consultation

St.Helens Council,

Town Hall,

Victoria Square,

ST HELENS

WA10 1HP

Dear St Helens Council.

Re: Local Plan Preferred Options Consultation

Whiston Hospital is bursting at the seams. Just a couple of weeks ago they made an appeal for people to stay away from A&E unless they have a dire emergency. Meanwhile GP's surgeries are struggling to cope and the pharmacies where we were urged to go for medical advice are under threat of closure.

Dental practices are not a whole lot better with many reluctant to take on new NHS patients.

As many parents know places in local schools are increasingly difficult to obtain forcing pupils to travel. Given the congestion on our roads travelling even a few miles can be a long commute.

③

So here we are with your plans to build thousands of homes on our beautiful green belt land and n'er a word about infrastructure. While plans announced so far are specific on the number of houses they are rather vague on the details of schools and healthcare facilities.

Joined up thinking it isn't.

I'm no expert but would it not be a good idea to start with a plan of the infrastructure before they start throwing up hundreds of new houses or is that too logical? Are we going to wait until the roads are gridlocked and schools are using Portakabins for classrooms?

We already have the sick sleeping in hospital corridors and ambulances unable to offload patients for lack of beds. St Helens Council have had a vendetta about Eccleston for many years and seem to be hell-bent on closing every facility they can get away with. So what's going on?

How can they plan cut-backs and closures at the same time they are planning thousands of additional houses? It makes no sense whatsoever.

The only logic to be deduced from this is that projects generating profit will be acted upon with great alacrity while those requiring expenditure will be ignored, avoided and denied until the chaos becomes overwhelming. It's a self-perpetuated crisis.

We are not fools. That proportion of the East Lancashire Road close to Windle Island has nose to tail traffic from about 4pm every evening. New residents will love the petrol fumes and all access roads being blocked.

I don't know what image these developments are supposed to project but I'm guessing it isn't overcrowded schools, gridlocked roads and an overnight stay in a hospital corridor.

The recent turn out by Eccleston and Windle residents just goes to show the strength of feeling here. People are angry as the bigger developments will have an even more detrimental effect on our village. The consultation is very clear on the plans for very large numbers of new homes but very sketchy on what kind of infrastructure would be needed to support them. It is blatantly obvious our infrastructure simply cannot cope with these plans. We have no idea for example of how our roads will cope, no idea about how our health services will cope and we don't know how our schools can handle hundreds of extra pupils. If we lose our Greenbelt, it will change our village forever and I am not about to sit back and let that happen without a fight.

Eccleston has always been a highly sought after semi rural village due to its attractiveness and village feel but if all the homes you intend to build here go ahead then it would totally change the village and it would become a massive and unattractive urban sprawl. What makes you think so many

houses need to be build? The figures you have arrived at are pure fantasy based on completely inaccurate projections and nothing more. What makes you think so many people will be rushing to

move to all these new houses when your town centre has totally failed in its objectives. New home buyers want to live close to towns with a great choice of wonderful shops and amenities like in

Warrington or Wigan. There have been so many new developments in Eccleston over the last 25 years including Longmeadow, The Cloisters, Eccleston Woods, Pikes Bridge Fold, Millers Fold,

Percival Way, St Thomas Close, The Spires, Eccleston Grange, need I go on? We have had far too much development causing roads to be congested, amenities put under great strain already. Our

only surgery being in a port-a-cabin in the church hall car park, a chemist under a threat of closure and the promised new one hasn't even been built yet at Eccleston Grange, we have two village

schools who would not cope with many more hundred extra pupils, we have one tiny village hall with an unusable church hall. There is so much more brownfield sites across the borough which you

have never bothered to look into the possibility of building here.

Can you really see thousands of vehicles going to and from home to work or school once, twice or many more times a day through residential estates, past schools and along our country lanes? I do

not. You will not be able to make it safer as how are you going to widen roads when so many houses are in the way? Obviously you have not seen the traffic jams along Gillars Lane and it's junction with

Burrows Lane, the huge volume of traffic along Rainford Road towards Windle Island, down Bleak Hill Road to its junction with Rainford Road at peak times and this is now before any more

developments are made. Open your eyes and just see how our infrastructure here is and imagine how much worse it would be with the development you propose.

To hear that developers want to destroy the green belt land here is almost beyond belief. There is so much other open land in the borough that isn't green belt, so you should be building on that first and not using the greenbelt just because it's easier or better for you or because they will generate you more profit as they will be in some of the most desirable locations in the borough and you won't need to do anything to detoxify the land.

I totally accept we do need to build more homes in England, but this can be done in a way that preserves our green belts for future generations and prevents urban sprawl. There are alternative ways to build more homes, such as prioritising brownfield development. You have not done this. You have also totally failed to take into account any of the infrastructure issues.

Yours sincerely,

Edward Mercer

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

2/18/2019 7:12:26 PM

PO0240

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0477
Type of Submission	Web submission
Full Name	Mr Mike Hindley
Organisation	
Address	39 Laurel Drive, Eccleston St Helens WA10 5JB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Check
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Check
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Fails to correctly account for the number of new houses needed. It overestimates the value and should be recalculated, based on the workings of other councils. There is also inadequate analysis of use/transfer of brown field sites in st Helens. The increase in traffic on the local infrastructure has not been thoroughly evaluated and will lead to more congestion, pollution, accidents and noise and therefore is not sustainable.

①

②

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/16/2019 6:44:15 PM
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PO0241

EFO035

- ① - GEN
- ② - Para 1.7.2 DTC
- ③ - LPA06, SHS



Local Plan Representation
barton su
to:
planningpolicy
12/03/2019 11:28



1 Attachment



CRBarton Representation March19.doc

Please find attached my Representation on the Local Plan (2018). I would like an acknowledgement at the earliest convenience and trust that this will be forwarded to the Planning Inspector following the due process.

Clive R Barton



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Clive	First name:
Last Name: Barton	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Brooklands Road Eccleston	Address:
Postcode: WA10 5HE	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 12/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy Local Plan 2018		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> x

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> Which National Policy? I assume NPPF(2018)

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Firstly, I will comment on the process of presenting and delivering the Local Plan to meet Legal requirements.

In December 2016, St Helens Council published their Preferred Options and asked for comment. This follows procedure and 5695 responses were received. These responses have been published in The Report of Consultation 2018. I will refer to this later and particularly to the land labelled HA16 (now 8HS).

Following several delays, the Proposed Version of the Local Plan (2018) was agreed by Council in December 2018. It was not unanimous.

The process of responding to this version has been difficult and off putting. The electronic version of the plan contains grammatical errors such as

U NO

5. If you consider the Local Plan is it because it is not:

Please read the guidance note for explanations of the tests of soundness.

The guidance notes are complicated for the general public and refer to seven different policies.

I attended a Drop In session to ask for assistance with this process where I spoke to four Council officers. I asked how the review of the representations would be undertaken and whether the Proposed Version could be altered as a result. Two officers said that minor modifications could be undertaken and one gave the example that housing figures could be altered. I do not believe this to be the case. The quality of advice from the Drop In was questionable and many questions could not be answered. However, St Helens Council appear to have undertaken the process of community involvement. There is little evidence that this was effective or that the Local Communities are being actively involved in the preparation and revision of this Plan.

Secondly I will address the Duty to Cooperate. I have reviewed a wide selection of Local Plans for the Liverpool City Region(LCR) including the LCR Shelma (2017) and compared the housing projections with ONS sources and those produced by GL Hearn for various authorities.

LA	Plan	Housing per year	Years	ONS 2014 SNNP	above baseline	GLHearn LCR Shelma 2017 Baseline Growth	above ONS 2014
Halton	PO 2018 Local Plan	466	2014-2037	254	140	326 565	212
Knowsley	2016 Local Plan	450	to 2028	280	179	271 373	170
Liverpool	2018	1739	2018-2033	1739	877	862 1791	0
St Helens	PSV 2018	486	2020-2035	416	89	397 855	70
Warrington	PSV 2019	945	to 2037	762	-4	949 973	183
West Lancs	PO2018	396 475	2019 - 2027 2027-2050	193	175	221 241	203
Total	Wlancs to 2027	4482		3644	1456	3026 4798	838

It can clearly be seen that all neighbouring authorities, other than Warrington at -4, are targeting above baseline growth. The target levels are based on data that has been superseded by the, more applicable, ONS (2016) – however government have, unfortunately, allowed the Councils to continue to use obsolete figures.

This table reveals that there is a possible regional housing oversupply of 1456, using Baseline data or 838 using the ONS (2014). The Duty to Cooperate has clearly not been fulfilled by the process and the St Helens Proposed Local Plan Version (2018) does not meet the test for Legality, other than by lip service. ②

The sources for the data are as follows

Reference

West Lancs <https://www.westlancs.gov.uk/media/544362/master-lpr-po-v41-final.pdf>
Warrington <https://www.warrington.gov.uk/news/article/2765/plan-set-out-for-warrington-s-future-development>
Knowsley <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>
Halton <https://www3.halton.gov.uk/Pages/planning/policyguidance/pdf/newdalp/written.pdf>
Liverpool <https://liverpool.gov.uk/media/1357189/shlaa2017-volume-a-final-sept-2018.pdf>
West Lancs https://www.westlancs.gov.uk/media/503879/HEDNA_WestLancashire_Mar2017.pdf

My third, and final, issue regards the parcel of land labelled 8HS (formerly HA16).

During the Consultation process in late 2016/early 2017 residents raised relevant and key issues regarding the inclusion of this parcel and its suitability to be developed for housing.

Facts included: the parcel is Grade 1 and 2 agricultural land and currently farmed; the middle section includes a flood plain; it is adjacent to the A580 (a very busy two lane highway connecting Liverpool to Manchester) where pollution levels are high; there is a significant lack of infrastructure in the locality (primary and secondary schools are oversubscribed, there are very few buses, it is 3 miles to the nearest train station) and local highways problems have been declared unfixable. St Helens Council acknowledged these concerns by removing the immediate threat of building over 1000 houses on this unsuitable land and replied that, "As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within the Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review." ③

This is contradictory to published guidance on removing land from Green Belt which must be based on "exceptional circumstances". The Council have openly stated that this land may never be required for development which effectively negates the exceptional circumstances issue as well as opening the door to a challenge from the developer who has already published plans for the parcel.

Finally, I have been grateful to the local group of volunteers who have worked hard to keep residents clearly informed of the process and would like to acknowledge their effort on my behalf.

I have read, and totally support and agree with, the submissions made by ECRA and that of the SHGBA made by Kirkwells.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

x	No , I do not wish to participate at the oral examination
----------	--

Yes , I wish to participate at the oral examination
--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0242



16-00995 - Newton-le-Willows - Haydock Park Racecourse - Newton-le-Willows - The
Jockey Club - Tplan - Planning
Neil Jones
to:
planningpolicy@sthelens.gov.uk
12/03/2019 15:49

① - POLICY
OMISSION

1 Attachment



Representations Form Submission Representations March 2019(1.0) - signed....pdf

Dear Sir / Madam

Please find attached our representations to the Local Plan made on behalf of The Jockey Club.

Regards

Neil

Neil Jones

BA (Hons) DipTP MRTPI AssocRICS
Partner
Town Planning



RAPLEYS LLP
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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSPD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Neil
Last Name:	Last Name: Jones
Organisation/company: Jockey Club Racecourses Limited	Organisation/company: Rapleys
Address:	Address: 55 Spring Gardens Manchester
Postcode:	Postcode: M2 2BY
<div style="background-color: black; height: 40px; width: 100%;"></div>	

Signature:

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to attached letter of representations

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to attached letter of representations

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please refer to attached letter of representations

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

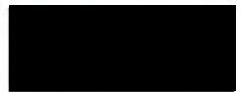
**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

NJ/605/288/1

12 March 2019

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

55 Spring Gardens
Manchester M2 2BY



LONDON
BIRMINGHAM
BRISTOL
CAMBRIDGE
EDINBURGH
HUNTINGDON
MANCHESTER

Sent via email only

Dear Sir / Madam,

Re: Representations to the St. Helens Local Plan Submission Draft January 2019 on behalf of Jockey Club Racecourses

We act on behalf of Jockey Club Racecourses ('JCR') and have been instructed to submit representations in respect of St. Helens Local Plan Submission Draft.

1. Background and Context - Haydock Park Racecourse

By way of background, JCR is the owner and operator of Haydock Park Racecourse which is located primarily within the administrative area of St. Helens Council but with a parcel of land to the northern most part of the site falling within the administrative area of Wigan Council.

Haydock Park Racecourse is an asset of national importance and a major visitor attraction within St. Helens and has become the scene of some of the most popular and attended events in the Northern racing calendar. These include the Grand National Trial in February, the Temple Stakes in May, the Old Newton Cup and Lancashire Oaks in July, the Sprint Cup in September and the Betfair Chase in November.

With a choice of four grandstands and 33 private viewing suites, restaurants, bar and leading conference facilities, Haydock Park is as well-known for world-class racing as it is for hosting spectacular events, attracting visitors in their thousands each year. As an asset of national importance and a major visitor attraction within St. Helens, the Racecourse is a significant contributor to the local and regional economy both in terms of financial income and job creation.

The primary objective of JCR's involvement in the development plan process is to seek to protect and promote its current business operations, both during the short and long term, ensuring the viable future of the Racecourse as an international tourist attraction and events facility on both race and non-race days throughout the year.

As such, JCR is focused on a number of key objectives, including:

- Maintaining the Racecourse in its ability to host world class jump and flat race meetings whilst enabling the expansion of the current racing programme;

- Giving consideration to future redevelopment proposals which will ensure that the land and facilities at the Racecourse are used to their optimum to support and enhance existing facilities and the operation of the Racecourse; and ✓
- Retaining and creating jobs (i.e. through the year-round employment of administrative staff based at the Racecourse; the employment of other staff during race meetings and other events; and the potential for further employment of additional people through the development of further complementary facilities). ✓

The enhancement of JCR's business operations through future redevelopment and renewal of the Racecourse will maintain the widespread interest that horse racing at Haydock Park generates and will continue to bolster the local economy. In addition, as JCR continues to improve and renew the Racecourse and associated facilities, JCR seeks to promote ancillary uses which will complement the main role of the visitor attraction.

These aspirations will facilitate and provide future investment in the ongoing improvement and upgrades to the Racecourse and related activities. As such, changes to local planning policy in the locality are of significant interest to JCR, particularly those that may affect current and future operations of the Racecourse. ✓

The Spatial Vision for the Local Plan recognises Haydock Racecourse, amongst other attractions, as a cultural and visitor attraction which offers a range of indoor and outdoor activities for residents and visitors and seeks to ensure that the assets are well used and valued. ✓

In accordance with the ambitions of the Spatial Vision, the implementation of these key objectives will assist in improving an important and significant tourist destination in St. Helens with the creation of tourism related jobs and the demand for new and additional services, in turn, leading to the creation and growth of businesses in the area.

In this regard, JCR must ensure that the emerging policy framework protects and promotes the ongoing operation and future improvements at the Racecourse. Furthermore, the framework must meet the ongoing and future needs of the Racecourse whilst ensuring that policy is sufficiently flexible to respond to changes over the timespan of the Plan.

2. Representations ✓

Submission Draft Policies Map and Local Plan Green Belt Review 2018

Notwithstanding the Council's support for tourism resources and facilities in draft Policy LPA04, the Racecourse is currently retained within the Green Belt on the draft Policies Map. Development proposals for the Racecourse would therefore continue to be considered and determined against draft Policy LPA06: *Extension, Alteration or Replacement of Buildings in the Green Belt* and national Green Belt planning policy and guidance.

In this regard, any development proposals for the Racecourse which seek to enhance the Racecourse and provide further investment to the Borough, in accordance with draft Policy LPA04, could be unnecessarily restricted or precluded when considered against local and national Green Belt policy.

In accordance with the Council's Strategic Objective 5.2 which seeks to support the development of the tourism, leisure and rural economy, the Council places clear emphasis on protecting and generating growth of such sectors throughout St. Helens. ✓

The National Planning Policy Framework (NPPF) provides clear guidance on the preparation of local plans, recognising the different needs of businesses in different locations, and the importance of engaging with local organisations and businesses and planning positively to meet their needs to facilitate sustainable economic growth. ✓

The NPPF requires LPAs to plan positively for social, recreation and cultural facilities for sustainable communities. Fundamentally, the NPPF advises that local plans should set clear policies on what will or will not be permitted and where, without being unnecessarily prescriptive, so that the Plan is sufficiently flexible to respond to changing circumstances. ✓

This should be recognised when considering future policy for development proposals for the Racecourse. We therefore consider it necessary for the Plan to promote the important role and function of the Racecourse to the economy of St. Helens. The Plan should therefore contain planning policy which enables decision makers at St. Helens Council to react appropriately to development proposals for the Racecourse which seek to enhance existing operations.] ①

Consequently, we propose that the Previously Developed Land (PDL) within Haydock Park Racecourse (as shown on the enclosed site Plan) is removed from the Green Belt to ensure that the future enhancement of the Racecourse can be achieved in accordance with draft Policy LPA04.] ①

This PDL comprises the main Racecourse buildings, temporary structures associated with the operation of the Racecourse, stables and outbuildings, storage and maintenance areas and associated car parking areas. Owing to the scale, nature and extent of the built form within the identified area, the site retains the characteristics of urban land and does not reflect the typical character of Green Belt. ✓

Paragraph 134 of the NPPF states that the Green Belt serves five purposes which include:

1. To check unrestricted sprawl of large built up areas;
 2. To prevent neighbouring towns merging into one another;
 3. To assist in safeguarding the countryside from encroachment;
 4. To preserve the setting and special character of historic towns; and
 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- ✓

It is recognised that the Green Belt Review 2018 assessed the PDL site as part of the wider Racecourse site (GBP-034) and concluded that, as a whole, it continues to make a strong contribution to the purposes of Green Belt land.

However, it is considered that there is a strong case for the removal of the PDL area of the Racecourse from the Green Belt when it assessed against of the relevant points of NPPF paragraph 134, which are dealt with in turn below: ✓

Check Unrestricted Sprawl and Prevent Merging of Neighbouring Towns

The PDL is located adjacent to established major residential areas to the north and west of the site and immediately adjacent to Local Plan site ref 2015_003, which has been removed from the Green Belt in this Submission version of the Local Plan and which is being promoted for residential development via separate representations on behalf of JCR. Due to the presence of these developments and proposals, existing mature landscaping to the north and south, and the retention of] ①

the racetrack area as Green Belt land, any new development on the PDL would not result in unrestricted sprawl or coalescence of neighbouring built up areas. Rather, a strong, defensible Green Belt boundary would be instated.

On this basis, it is not considered that the removal of the PDL from the Green Belt will result in the unrestricted sprawl or merging of neighbouring towns as is the purpose of 1 and 2 above.

Safeguard the Countryside from Encroachment

Preserving the remainder of the Racecourse beyond that of the PDL as Green Belt will maintain a buffer between the settlements of Edge Green and Ashton in Makerfield and any future development that may come forward to the south of the Racecourse.

Any future development of the PDL will not have a significant adverse impact on the openness of the Green Belt given the well-established nature and scale of the existing built form at the Racecourse. Nor will it result in encroachment into the countryside given that any future development will be retained within the identified PDL boundary.

Furthermore, it is not considered that the land meets the requirements for Green Belt when set against Paragraph 139 of the NPPF which states that "*when defining local boundaries, local planning authorities should:*

- *not include land which is unnecessary to keep permanently open.*"

On this basis, the retention of the PDL within the Green Belt is not considered essential to prevent encroachment into the countryside and therefore should not be retained as such.

Preserve the Character of Historic Towns

Given the nature and character of neighbouring settlements, it is not considered that the Green Belt in this area serves this purpose.

Encouraging the Use of Derelict and Other Urban Land

As stated above, owing to the urban character of the PDL, it is considered that justification exists for supporting and encouraging appropriate racecourse development on the site that could otherwise be restricted by Green Belt policy, by removing the PDL from the Green Belt in the Local Plan review.

This will ensure that the Policy effectively encourages the achievement of the key Government objective of building a strong, competitive economy and allocating a range of sites to meet requirements for new recreational tourism and visitor related development. In addition, the policy will assist in providing the appropriate supportive policy context for the evolution, enhancement and protection of the Racecourse and its operation over the Local Plan period in accordance with the provisions of draft Policy LPA04.

In this regard, it has been demonstrated that the PDL at the Racecourse does not serve the 5 purposes of the Green Belt and should be released accordingly.

3. Haydock Park Racecourse Area Policy

We request that a specific Racecourse policy be included in the Local Plan to specifically promote this key tourism facility.

Consequently, we request that the following policy is included in the Local Plan.

"Haydock Park Racecourse

Within the Haydock Park Racecourse Policy Area, development proposals which support, protect and enhance the recreational, tourism and conferencing functions of the Racecourse will be supported.

Within the remaining part of Haydock Park Racecourse which lies within the Green Belt, development will be considered and determined in accordance with Green Belt Policy and other Local Plan policies."

We request that our client's representations will be fully taken into consideration in the Local Plan process going forward. We request confirmation that these comments have been duly received and registered.

Should you require any further information, please contact the undersigned.



Yours faithfully,

[Redacted signature block]

Neil Jones
BA (Hons) DipTP MRTPI AssocRICS
Partner - Town Planning

[Redacted contact information block]



JCR Ownership Area



Previously Developed Land



Proposed Racecourse Policy Area



Land Subject to Separate Representation for Housing Development



LOCATION PLAN HAYDOCK PARK RACECOURSE

Scale @ A3 :

Not to Scale

Plan No. :



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PO0243



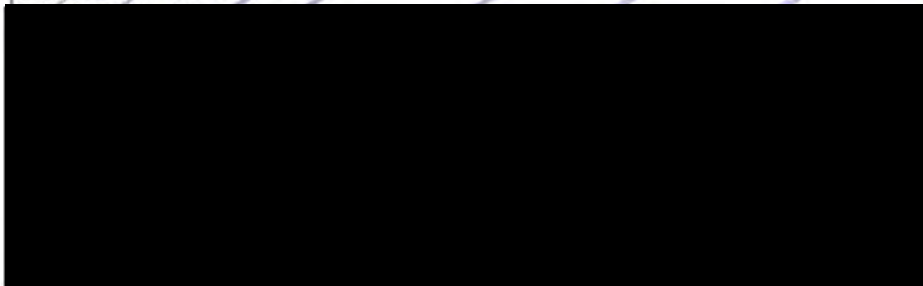
St Helens - Submission Draft

Jones, Robin@Manchester

to:

planningpolicy@sthelens.gov.uk

12/03/2019 07:43



ELO073

① - LPC12

② - GEN

③ - LPD 02

④ - LPA04-1

⑤ - LPA05-1

⑥ - LPD05

⑦ - LPC12

⑧ - LPD01

1 Attachment



St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,

Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd

10th Floor | One St Peters Square | Manchester | M2 3DE

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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Date 12th March 2019

St Helens Council
Town Hall
Victoria Square
St. Helens
WA10 1HP

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

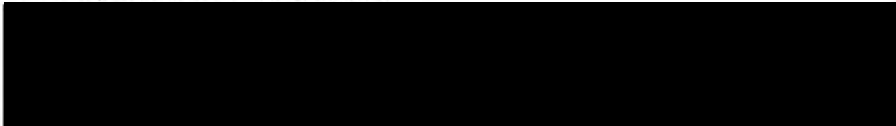
delays to delivery. We are keen to reemphasise the message that it is essential for early and continued detailed discussions take place over the revised allocations, in a bid to negotiate and agree any measures required to support the delivery of the proposed allocations within the revised draft. We strongly advise that contact is established at the earliest stage, ideally before any land transactions, and certainly prior to any application to explore options early as possible.

As more information becomes available on development proposals such as the approach to surface water drainage and the timing for the delivery of development, which is often only available at the planning application stage, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. We therefore request the Local Planning Authority encourages any future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. Future discussions must consider wider proposals, such as proposed transport schemes/improvements, to support new development. There is opportunity to co-ordinate the delivery of proposed highway schemes with any new infrastructure United Utilities may require to facilitate wider development in the borough.

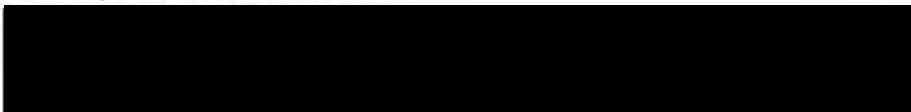
There are a number of significant strategic allocations within the Local Plan and it is of the utmost importance that there is infrastructure delivered to sustainably serve these areas beyond the plan period. There is genuine opportunity to leave a positive legacy from new development by ensuring there is infrastructure that will serve not only the allocation but potentially make improvements for the wider area. The reason this is mentioned is that it at times goes beyond the planning system, requiring communication with highway departments or other stakeholders. We wish to work collaboratively alongside stakeholders to ensure the sustainable delivery of new development across the borough.

We wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting:

Developer Services - Wastewater



Developer Services – Water



Specific Policies

Draft Policy LPC12: Flood Risk and Water Management

UU welcomes the approach taken within Policy LPC12 and specifically clauses 8 – 12 which address sustainable drainage. We do however suggest the following minor amendments to clause 10, please note that your wording is in red, and our suggestions are in blue:

} ①

'Discharge of surface water to a public combined sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period. Any development proposal should demonstrate unfettered rights to discharge between various phases.'

①

With respect to the detailed design of new development sites, we would like to highlight the importance of careful consideration of site drainage in comparison with proposed finished floor levels. We recommend policies on the design of new make reference to the need for applicants to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer. This helps ensure new development is more resilient to the impacts of climate change and the potential for flooding from sewers. A possible policy is set out below.

②

'Applicants will be expected to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer.'

Draft Policy LPD02: Design and Layout of New Housing

We suggest emerging Policy LPD02 includes an additional clause to ensure water efficiency measures are fully considered in the design of new development. Below is an example of wording that we would recommend including within this policy:

'New residential developments will be required to:

'11. to demonstrate the site is drained in the most sustainable way, making use of topography, landscaping and ground conditions should encourage water efficiency measures including water saving and recycling measures to minimise water usage. A developer may be required to accommodate an element of open space for the discharge of surface water through the incorporation of sustainable drainage systems.'

③

'12. Demonstrate the new development has considered incorporating water efficiency measures as part of the design.'

United Utilities seeks to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

PO0244

Representor Details

Web Reference Number	WF0252
Type of Submission	Web submission
Full Name	Miss Caroline Cassidy
Organisation	
Address	128 Leach Lane St Helens WA9 4PH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	HS04 Land at Bell Lane
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Basically, the land was set for release (safeguarded). Now, the council have decided not to release it because there are multiple owners & they feel it is too difficult when there are plots with only one owner. That's fine, but when they safeguarded it, they knew about the situation & have done for 12 years. This decision is discriminatory in my opinion. I have worked hard to contact the owners who are all willing to sell their land. A lot of the unsold land belongs to the company who sold it to us in the first place, so it is not in their interests not to sell the land. This land has new builds right up to the perimeter of the land. A residential housing area behind it & other farm houses just past it. So, why it hasn't been released is a mystery. The problem is, a lot of the landowners are in their retirement and in another 15 years, they may not be alive. The land they own, like ours will go to charity or family members. So, when you finally run out of land and want to use it for housing, it will be an even bigger problem than it is now.

7. Please set out modification(s) you consider are necessary

Firstly, I think that the wording of this plan is so confusing, so having a say on it is difficult. Landowners have been put off filling in these forms, so my comments may not be in the right area or indeed answer your questions. This process should be made simpler than it is.

I feel there has been no help from the council for the Bell Lane site. A planning officer assured me he would write to the landowners to try & help matters when I couldn't locate a few of the owners. That didn't happen. The same officer said the council did not want to put any resources into this site since other (easier) sites were available. A new build in this area I feel would enhance the local area which has been on the decline for years. Small businesses have closed due to not having any passing trade. Houses are all around it. The council have been busy allowing playing fields that have been enjoyed & used for many years to be built upon, clogging up a very small side road with traffic, doing nothing to enhance my area in the slightest. Yet the land we own has been left an eyesore, with overgrown shrubbery & self seeded trees blocking anyone's view of the countryside. At some point you are going to need this land, as you simply cannot build in front of it before you release this parcel as you will have already set the precedent for housing. But, the longer it is left, the more trouble you will have getting anyone to sell. I have worked tirelessly over the years contacting the plot owners & we all feel very let down by the council. Safeguarding the land for housing gave us all so much hope as many of us lost our life savings on buying this land from PropertySpy. To confirm, some of the owners have given up on filling these forms in, so I hope that someone, somewhere will reconsider this plot of land and hopefully add it to the local plan. I feel we have been discriminated against.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 4:52:15 PM
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PO0245

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA04.1, Statagic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middleswich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

pollution, noise and air pollution. The effect would be a reversal of the intent so recently shown by St Helens Council in the recent AAP of 2017. 01

With respect to pollution from diesel lorries and other additional traffic generated in the Great Sankey area: One of the current occupants of a warehouse on Omega South – Amazon – operates three times as many lorries to and from their warehouse as was expected by the developers of Omega for the area of the development. If this were repeated for any of the warehouses proposed for the Bold Forest Park extension, it would add even more than expected amounts of pollution, noise and congestion to the roads and surrounding area. 08

I have three young grandchildren growing up in the Whittle Hall – one of whom has spent time in hospital with asthma-related breathing difficulties on more than one occasion. For this additional reason, I oppose an extension of the Omega South development across the border into St Helens and would ask if a case of 'exceptional circumstances' has been made? 09

7. Please set out modification(s) you consider are necessary

In line with the above comments, to make the report sound, it is proposed the Draft Local Report would have the references to the development of the area designated 1EA removed, such that this area remains part of the current Green Belt. (Minor changes may be required to various supporting documentation where this proposal has been mentioned.)

If, following the review, the argument for proceeding with removal of the area 1EA from Green Belt for the stated purpose is considered justified, in the light of the above and any other arguments presented, then a statement of intent in the documentation to minimise the environment impact on the Bold Forest Park area, and facilitate enhancements where possible, would seem appropriate.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 4:27:16 PM
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PO0246



St. Helens
Council

640

13 MAR 2019

Ref: LPSD

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LOUISE	First name:
Last Name: FORSHAW	Last Name:
Organisation/company: WARRGRAVE BIG LOCAL	Organisation/company:
Address: 124 WARRGRAVE ROAD NEWTON-LE-WILLOWS	Address:
Postcode: WA12 8JU	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 10-03-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

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

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Page 2, 1.4 Preparing the Local Plan = no-one has consulted with Wargrave Big Local. ①

Page 9, 2.7 Transport = Public Transport to Omega in Warrington is required. Lack of greenspace in Wargrave inhibits cycling and walking.

Sites released from Greenbelt areas 043/044/046 in Wargrave is already over-developed and road infrastructure unable to absorb more. ②

P. 56 Carbon Emissions and air quality = Air quality on Wargrave Road is poor and there has been no attempt to widen travel choice or tackle air quality issues.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

land east of Newlands Grange and west of West Coast Mainline in Newton-le-Willows should remain as Greenbelt and not built on as Wargrave is unable to absorb any ^{more} new housing.

Work with Wargrave Big Local to produce a "Travel Plan" for Wargrave that can act as a model for other areas.

Improve air quality and tree planting in the Wargrave area. Ensure there are green spaces for this to happen.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☒ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

PO0247

Representor Details

Web Reference Number	WF0210
Type of Submission	Web submission
Full Name	Councillor Rob Reynolds
Organisation	
Address	10 The Spinney, Rainford, Lancashire WA11 8AS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	All
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**Legality of the plan**

In page 2 of the council's guidance on this form (https://www.sthelens.gov.uk/media/9460/lpsd-representation-form_guidance-note.pdf) under the heading "Legal compliance and duty to cooperate" they say that "The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI)".

The SCI is available here: <https://www.sthelens.gov.uk/media/3195/statement-of-community-involvement-november-2013.pdf>

The SCI says that "evidence gathering" and "community involvement" must precede the decision to adopt the plan; however I believe that the Councillors in charge of the process had made their minds up before the consultation began. I believe this can be demonstrated by consideration of the facts. The consultation was announced shortly before Christmas and ran over the Christmas break, this made press coverage and opposition difficult. Despite this the council was obviously overwhelmed by the response. This is evidenced by their repeated failure to meet their own deadlines.

At the beginning of the local plan process St Helens Council did not have a brown field register and when pressed to prepare one by opposition councillors they refused saying they did not need one. They have since been forced to prepare one by the government, but again I think this shows that the minds of the councillors in charge of the process were made up before the consultation even began. They wanted more council tax and business rates and they had an overwhelming majority on the council to force this through, evidence was unnecessary and greenbelt land was expendable.

01

Senior Councillors from the ruling group have made numerous statements which suggest that their minds were made up prior to the consultation. One example is the comment by the then leader of the council on 1/05/2017 that one group of residents opposing the plan were "#nimbys". Bizarrely this comment was posted at 1.40am. [REDACTED] said that "As I say you are #nimbys it's ok to build just not in my back yard." While this was after the consultation I believe this makes his mindset and his attitude to the plan and to disagreement with it very clear.

[REDACTED] went on to say that "People forget that as a council we have had £90m cuts. We must do something to bring in money. I support jobs and investment any day over nimbyism." In my view the reference to the reduction in the council's central government grant shows that his principle interest was in generating a greater income for the council from council tax and non-domestic rates. While this is not an unreasonable position for him to take it is not one that justifies the release of large areas of greenbelt land. His comments can be read here:

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

On page 12 of the SCI at paragraph 3.5 it says that the council will "foster good relations between people in a diverse community". I do not believe they can possibly have complied with this when the then leader of the council resorted to childish personal insults in the early hours of the morning, to residents of the borough he was meant to be leading.

In November 2017 [REDACTED] (who was then a member of the council's executive) said that "Some of that green belt like at Florida Farm used to be pit head. Some of it used to be coal mines. It's not as if we are talking about the rolling hills of Shropshire here. But then there are other parts of St Helens that are also listed as green belt that are absolutely outstanding and deserve protection." He was dismissing the concerns of local residents about the loss of their greenbelt land because in his view it isn't as pristine as land in Shropshire. This comment shows that his thinking was being influenced by factors that were totally irrelevant to the decision. His comment can be found using the link below, you will note that St Helens Council failed to respond to resident's concerns about [REDACTED] views: <https://www.sthelensreporter.co.uk/news/protest-groups-seek-clarification-on-councillor-s-greenbelt-remarks-1-8863709>

[REDACTED] was initially the council executive member with responsibility for the local plan, however he was sacked during infighting within the ruling group. He was replaced by [REDACTED] who had clashed with opponents of the plan on social media and had in his own words given "vocal support to the Local Plan and other planning applications."

[REDACTED] said that "It is not fair on the council that the objections that this has attracted should overshadow the delivery of an ambitious Local Plan that this council deserves." I believe this shows that [REDACTED] mind was made up and that he was more concerned about the interests of the ruling group of the council and what he felt they deserved than he was about local residents. [REDACTED] resigned a week later after being served with an official notice by police which set out an allegation of harassment against him (he denied any link between the notice and his resignation). I cannot believe that [REDACTED] was the right person for the role given his antagonistic relationship with opponents of the local plan and the fact that the council's standards committee had already ruled against him once. He was replaced by the man he had himself replaced a week earlier, [REDACTED] ([https://www.theboltonnews.co.uk/news/15289535.\[REDACTED\]_resigns_from_growth_role_after_a_week/](https://www.theboltonnews.co.uk/news/15289535.[REDACTED]_resigns_from_growth_role_after_a_week/)).

A further illustration of [REDACTED] behaviour and his relationship with opponents is found in the fact that he was subsequently censured for comments made between November 2016 (before the consultation) and September 2017 "related to various campaign groups"

<https://www.wigantoday.net/news/politics/councillor-accused-of-sending-phallic-symbol-to-campaign-group-1-8911889> Again referring back to paragraph 3.5 of the SCI, given his behaviour the appointment of [REDACTED] could not but harm efforts to "foster good relations between people in a diverse community".

the new leader of the Council refused to defend the local plan in our meeting of 21/12/2018 saying that "As council leader, I became one of the unpaid council representatives on the long-standing partnership set up to regenerate the former Parkside Colliery site. For openness and transparency, I will follow my usual practice and make a declaration of interest and follow the convention of leaving the room for that item." If [REDACTED] was too conflicted to vote on the decision to adopt the plan should he not have removed himself from the process of developing it? Either he had a conflict of interests or he did not, this cannot be a sort of Schrodinger's conflict of interests which applies when it suits him does but not when it does not

<https://www.sthelensreporter.co.uk/news/politics/st-helens-council-leader-slams-opposition-vote-against-local-plan-1-9504626>

It is my belief that this local plan is not legally compliant as the council have failed to comply with their own Statement of Community Involvement. My belief that they have failed in this duty is founded on my view that senior members of the ruling group made their minds up based on factors that are irrelevant to the process and that they never took the consultation process seriously. I believe I have demonstrated this through my comments above.

Soundness of the local plan

The council's own guidance says that the plan has to be "prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As I have set out above I believe that senior members of the council's ruling group, including two members who had been in charge of the plan and the then leader of the council have shown that they were being influenced by irrelevant factors. These factors include the desire to increase the council's income from council tax and business rates, a feeling that the council "deserved" the local plan and the fact that some of the land affected was not as pristine as "the rolling hills of Shropshire". This is what the senior councillors in charge of the process were willing to say in public. I cannot begin to imagine what they were saying in private.

I have also set out above some of my concerns relating to the attitude to consultation and the decision making process. Additionally when the question of whether the council should adopt this plan was finally brought to Councillors they called a special meeting for the 20th of December, less than a week before Christmas. Opposition councillors were only given two weeks to consider the plan before this meeting, members of the ruling group were briefed a week earlier. Most councillors are not professionals, many of us have jobs and commitments to our friends and families. Many of us had long standing plans in the run up to Christmas that we could not cancel.

The decision to hold an extra meeting at such short notice and give us so little time to prepare was totally unjustified and really quite outrageous. No apology was made for this and no explanation offered, we had a council meeting planned for January and no reason has ever been offered as to why this could not have waited until then. The decision to give Councillors from the ruling group a briefing a week before opposition members is, in my view, an appalling abuse of power. Especially given the timescales involved. If the plan was sound I do not believe the council would have made decisions which made opposition so difficult. They should have been willing to give opponents a fair chance to set out their views and then listened with an open mind.

The council has departed from the standard method to calculate housing need and there are no exceptional circumstances to justify this. The population projections used are overly optimistic about population growth in the borough. I fear that the land released from our greenbelt will be developed first as it is easier and cheaper than development on brownfield sites and that at the end of the process the population will not have increased by as much as expected. In this scenario we would have lost our green spaces and would be left with undeveloped brownfield sites. There is therefore, in my view, no "exceptional circumstances" justifying the release of greenbelt land.

The vision section of the local plan "high quality new employment development", but the only sector I could see specifically mentioned in a section on "Economy and skills" is logistics. The whole economic development side of the plan seems to be based on warehouses. The figures for how the land allocated for economic development will be used send a clear message; office space 10-15

hectares, research and development 1-4, light industry 15-20 hectares, storage and distribution is 110-155 hectares. Out of 190-239 hectares in total; more than half of that land is to be allocated to warehouses. Again I believe that the council's estimate of how many jobs "logistics" will create are an absurd over estimation.

Talk of "a diverse portfolio of accessible employment" is a fig leaf to hide an over reliance on one sector, a sector of poorly paid unskilled jobs and one that is increasingly automated. This is not long-term strategic thinking, it is a sign of how intellectually bankrupt this plan is and just how badly it would fail our Borough. St Helens has low paid jobs, we need a much greater diversity in employment that this plan would not deliver.

With respect to site 8HA in my own ward (and home) of Rainford. This site floods almost every winter and is obviously unsuitable for development. It slopes down towards a stream that runs through an area of the Borough called Blackbrook. Blackbrook regularly floods in heavy rain and both the Council and the Environment Agency have acknowledged the role that these fields play in slowing down the flow of water into the brook and therefore in reducing the peak flow of water in the stream. To build on these fields is an obvious folly that can only make this situation worse. The land is also grade one agricultural land and intensively farmed. Road access to the site is, in my view, inadequate for the addition of several hundred new cars and the roads could not be expanded without either eating into the site or demolishing houses. Many residents fear the effect that this development would have on doctors surgeries and local schools.

The council say that they want to have some of the land released from the greenbelt without incorporating it into the current local plan. This is in case it might be needed for a future local plan. This is self evidently not an exceptional circumstance.

I apologise for the length of my comments, but I feel very strongly about this and I have tried to the point.

7. Please set out modification(s) you consider are necessary

To adopt more reasonable population projections which will reduce the requirement for greenbelt land.

To come up with a new economic development plan that is not so heavily focussed on warehousing and which would again reduce the amount of greenbelt land required.

To remove site 8HA from the local plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 8:08:19 PM
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PO0248

Representor Details

Web Reference Number	WF0246
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	--- ---

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 - 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing.

01

02

03

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK

2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

7. Please set out modification(s) you consider are necessary

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
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PO0249



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

13 MAY 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>KEITH</u>	First name: _____
Last Name: <u>BRIDGE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>22 STATHAM AVENUE</u> <u>BILLINGE, WIGAN</u> <u>LANCS</u>	Address: _____
Postcode: <u>WN5 7RZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>12/5/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

THE WAY IT IS WORDED ON THIS FORM AND LINKING IT TO THE PLAN IS MISLEADING AND DIFFICULT TO FOLLOW. I BELIEVE IT IS DESIGNED TO LEAD TO CONFUSION AND MISUNDERSTANDING. (SECTION 3 OF THIS DOCUMENT IS TOTALLY INADEQUATE AND NOT FIT FOR PURPOSE

AND THEREFORE I CANNOT COMPLETE IT AS I WISH

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE WORDING OF THIS SECTION IMPLIES AGREEMENT WITH THE PLAN AND THAT ANY SUGGESTED MODIFICATIONS IMPLIES SUPPORT TO THE PLAN.

I TOTALLY DISAGREE TO ANY ALTERATIONS TO THE GREENBELT. THERE ARE MANY ARGUMENTS AGAINST THIS PLAN AND THE COUNCIL ARE JUST TAKING THE EASY OPTION BY USING LAND WHICH IS EASY TO BUILD AND DEVELOP WITHOUT CONSIDERING IMPLICATIONS (NEGATIVE) FOR THE RELEVANT COMMUNITIES CONCERNED.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

BECAUSE THE COUNCIL / PLANNERS NEED TO UNDERSTAND THE FEELINGS OF THE COMMUNITY AND THE STRESS IT IS CAUSING.

ALSO I ONLY HEARD OF THIS PLAN YESTERDAY ~~WHICH IS INSUFFICIENT TIME TO~~ IT SHOWS THAT THE COMMUNITY WAS NOT FULLY INFORMED WHICH I ~~ASSUME IS ILLEGAL~~

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0250

Representor Details

Web Reference Number	WF0222
Type of Submission	Web submission
Full Name	Mrs Gill Holmes
Organisation	
Address	13 Villiers Crescent Eccleston St. Helens WA10 5HP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Please see comments
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1: St Helens council have stated a principle of brownfield site first and greenfield only in extreme circumstances, however they have not demonstrated diligence in identifying suitable brownfield sites for housing or monies to support decontamination of these sites. Other councils have demonstrated a commitment to regeneration of town centres through housing development - a strategy that is desperately needed in St Helens. There has been little demonstration of imagination in solving this issue and the decision to build on greenfield sites is an easy option which leads to further dereliction and decay of the town centre. Eccleston's inclusion is the green belt which is to be safe guarded for development, this is grade 1 or 2 agricultural land, a very necessary resource at this time, therefore the plan is not justified ore sustainable. 01

2: Employment growth. The figures supplied are based on unreasonable assumptions and will lead to an oversupply of housing. the main source of employment will be warehousing which will not provide the high earning jobs suggested, also it is anticipated that warehousing industry will increasingly make use of robot technology which will reduce the predicted employment figures. These factors will affected the numbers and type of housing development and is not reflected in the plan making it unjustifiable and unsustainable. The employment figures quoted should be replaced by ONS (2018) which uses more current data. 02

3: Infrastructure: the Infrastructure Delivery Plan is weak to the point of non-existence. The areas to be developed already have the problems of oversubscribed schools and major transport problems. The 8HS is beside the A580 a major route between Manchester and Liverpool, already undergoing major work to improve traffic flow. Further disgorgement of thousands more cars onto this road will make this expensive upgrading pointless. Bleakhill Road is already a bottle-neck morning and night without further cars from a new development adding to the problem. There is also the issue of road safety there is the school on this road and access to this will become more difficult together with the danger of air pollution from idling cars - a very pertinent problem currently. It is proposed that Houghton's Lane development will exit directly onto the A580 in an area that is an know black spot - 3 people lost there lives at this point just before Christmas. For Windle and Eccleston 8HS acts as a lone greenspace and a buffer for the road pollution from the A580. It is the only accessible area of greenbelt criss-crossed by footpaths which are regularly used by residents. The Plan is not effective or justified. 03

4: Duty to cooperate: there is little evidence of discussion with other authorities or services e.g NHS. Neighbouring authorities have major development plans for both employment and housing and there is little evidence of discussion between authorities as to how realistic these plans are. It appears that it is a race to develop land and the first to build will win, such a policy will cause over prediction of employment and housing need which could be disastrous for the region. There appears to have been little negotiation with the NHS and the services that can be provided. The area already has a recruitment problem both for GPs and hospital staff, Brexit will make this worse and there has been little discussion as to how this development will affect services already stretched and whether it is possible for the NHS to respond to the extra demand. Therefore the plan is not sustainable. 04

The Plan does not comply with NPPF (2018) and it does not consider the more accurate and true housing and employment information in ONS (2018) figures therefore due to all the factors listed (and more) this could lead to an unsustainable oversupply of housing in the North West together with the loss of valuable agricultural land. 05

7. Please set out modification(s) you consider are necessary

Suggestion:

The ONS (2018) needs to be adopted, more accurate and realistic housing need statistics should be developed/sourced;

funding to decontaminate brownfield sites should be sourced;

redevelopment of town centre sites to enhance regeneration of this area is a priority;

remove all Green Belt areas from the plan; protect agricultural land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 2:19:27 PM
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PO0251



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

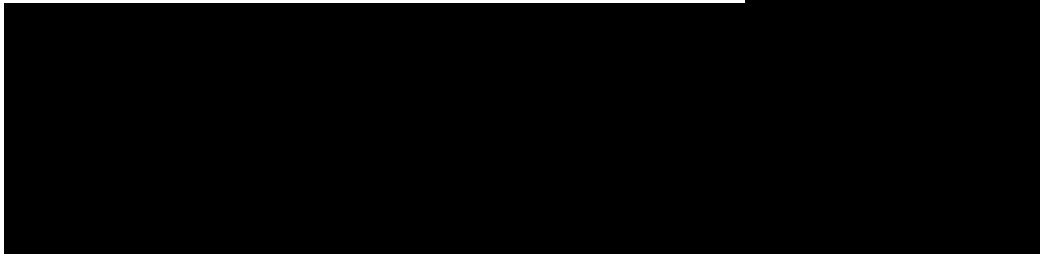
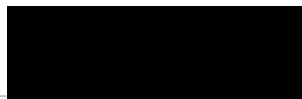
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

Response Date	3/13/2019 8:50:55 AM
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Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. We support the inclusion of objective 1.3 to ensure that effective use is made of previously developed land. 04 05
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes. Whilst we recognise that the Council seeks to deliver sufficient range of new homes, we consider that it is fundamental for the soundness of the Local Plan that the Council plans sufficiently to meet the need for affordable housing across the borough. 06
- 2.7 The introductory chapter of the Local Plan is clear in the difficulties facing the borough with regard to deprivation and the affordability of housing; the Local Plan notes that both of those trends are worsening and something that the Council needs to tackle. The provisions of sufficient affordable homes for those suffering most from that deprivation and worsening affordability will be a key to reversing those trends. Paragraph 2.5.3 of the Local Plan notes addressed affordability of market housing in the borough and notes that lower quartile house prices are over 4 times greater than lower quartile household income.
- 2.8 As set out later in these representations, the Government's Standardised Methodology for calculating Objectively Assessed Needs (SMOAN) for housing does make adjustments for trends in affordability. However, the SMOAN does not seek to establish what the need for affordable housing within the borough is and, therefore, a housing requirement that meets the objectively assessed need for housing overall may underdeliver against a specific need for affordable housing. 01
- 2.9 Lastly, our Client has some concerns in relation to the Local Plan's aspirations for contributing to the growth of the Liverpool City Region (LCR) as a whole. Whilst paragraph 1.7.1 of the Local Plan notes the extent to which St Helens has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy (SDS)). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority (LCRCA) prepared a Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA) which sought to assess the likely needs for housing and employment land across the LCR as a whole. 08

- 2.10 However, at 1.7.3, the Local Plan states that it relates closely to a range of more local strategies such as the St.Helens Housing Strategy, the St.Helens Plan, and the St Helens Economic Regeneration Strategy. As set out later in these representations, it is our Client's view that the St Helens Local Plan seeks to move back from its role in the economic growth aspirations of the LCR and proposes a lesser amount of development tempered only to meeting the development needs of the borough itself. Our Client is disappointed with this apparent position.
-

68

PO0252

① - LPA05 ② - Para 1-7.2 DTC
③ - LPA06, 8HS ④ - LPA02

Page 1 of 1
EFO015



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

wendy gore

to:

planningpolicy@sthelens.gov.uk

10/03/2019 19:05



1 Attachment



lpsd-representation-form - WG.doc

Dear Sir/Madam,

Please find attached my completed comment form.

Yours faithfully

Wendy Gore



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Wendy	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x
Sound?	Yes <input type="checkbox"/>	No x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x
Justified?	x
Effective?	x
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486	

this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

SHBC have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Catchdale Moss Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately two of the accidents in the last year involved two fatalities one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goe ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

there is nowhere to build them within the area of 8HS.

3

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
--	--

1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 26

**Thank you for taking the time to complete and return this response form.
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PO0253

EFO016

① - GEN

② - PARA 1.7.2

11/03/2019 09:28

③ - LPAOS



St Helens Local Plan Submission - Representation Form
Jo Banks to: planningpolicy

From:

To:

planningpolicy@sthelens.gov.uk

1 attachment



LPSD - Representation Form.pdf

Dear Sir/Madam

Please find attached my objection to the latest plans to build on Eccleston/Windle Greenbelt land.

Kind regards

Jo Banks

[Redacted signature]



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Joanne	First name:
Last Name: Banks	Last Name:
Organisation/company:	Organisation/company:
Address: 56 St Thomas Close	Address:
Postcode: WA10 6BN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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Victoria Square
St.Helens
Merseyside
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3. To which part of the Local Plan does this representation relate?

Policy	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes	No x (NO)
Sound?	Yes	No x (NO)
Complies with the Duty to Cooperate	Yes	No x (NO)

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	X
Justified?	X (NO) the plan is based on flawed methodology
Effective?	X (NO) the plan is not deliverable
Consistent with National Policy?	X It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.] ②

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.] ③

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 1

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ✓

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. 1

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise. 1

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 1

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. 2

The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren

brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

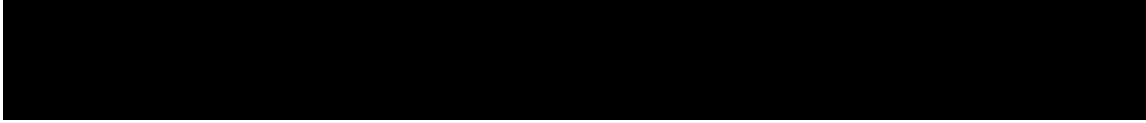
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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PO0254



Local plan
Cheryl Rank
to:
planningpolicy@sthelens.gov.uk
11/03/2019 14:46



1 Attachment



lpsd-representation-form CR.doc

Sent from my Samsung device

----- Original message -----



Date: 11/03/2019 2:44 pm (GMT+00:00)



Subject: lpsd-representation-form CR



St Helens
Council

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Cheryl	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <input type="text"/>
-----------------------	----------------------------

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Yes x (Via Email)

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Policy	x	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	x
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	No x <input type="checkbox"/>	
Sound?	No x <input type="checkbox"/>	
Complies with the Duty to Cooperate	No x <input type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> x no the plan is based on flawed methodology
Effective?	<input type="checkbox"/> x no the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> x no it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Does not satisfy:-</p> <p>The requirement for sustainable development.</p> <p>The criteria for sustainable transport – promoted increased car dependency.</p> <p>Sustainable housing, based on aspirational employment growth predictions.</p> <p>Effective land use by concentrating on green space over town centre development and brownfield.</p>	

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. ①
- Adequate regional and cross border collaboration has not been undertaken. ③
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. ①
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. ①
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. ④
- Council statement of "contaminated land sites" [2-15] indicated that 3,710 ha of lowest priority contaminated land exists in St Helens. Two green belt sites of 56.6. ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170 ha available if it were to be remediated. There are numerous empty properties in the borough and buildings that can be changed to residential use. There are areas of land that had residential properties on yet have not been redeveloped, eg Eccleston Street. ④
- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. ④
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. ②
- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be ④ ②

suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane.

- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Ecclestone and rail links are either in town centre or in Sutton. Steve Rotherham, Liverpool City Region Metro Mayor, Steve Rotherhamd speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : Nathalie Nicholas, Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."*
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only

interested in large scale, easy to clear land.

To promote local businesses council should commission local building/developing companies to establish local consortiums to develop on the smaller pockets of land.

Those sites that remain undeveloped should be made to finish the project.

Council should continue with projects to develop town centre development/change of use in tandem with it's plan for St Helens transforming our town to have more central living as the high street changes.

When the greenbelt is gone it is gone forever, changing the landscape of the area, there is no need for this.

Plan based on aspirational growth due to the new warehousing being built along the A580, these jobs are often lower paid, whereas building on 8HS is purely to make it easier for large developers to build high priced housing bringing in higher rates to the council and not social housing. Many people cannot get on the property ladder and these developments would not always be in the reach of some people. Demolish the old Tax office in College Street, this is an eye sore and would free up more land that can be used for housing.

Unsafeguard the 8HS site and keep it as agricultural land.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
--------------------------	--	--------------------------	--

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0255



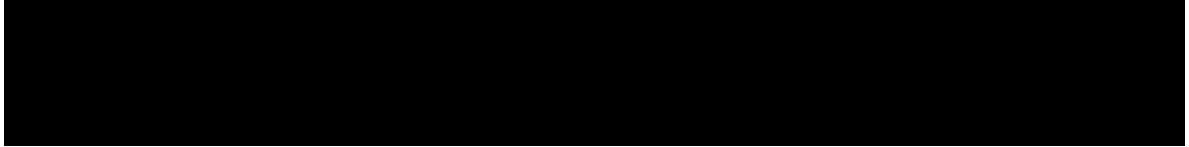
lpsd-representation-form CR

Richard Rank [REDACTED]

to:

planningpolicy

11/03/2019 15:27



1 Attachment



lpsd-representation-form CR.pdf

[REDACTED] has attached the following document:



lpsd-representation-form CR

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



Site 8HS

Ef0020

EMBED
MSPhotoEd.
3

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Richard	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
Address: 94 St Georges Avenue Windle	Address:
Postcode: WA10 6HD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: [REDACTED]
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	x	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	x
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?		<input type="checkbox"/> b x
Sound?		<input type="checkbox"/> b x
Complies with the Duty to Cooperate		<input type="checkbox"/> b x

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> no the plan is based on flawed methodology
Effective?	<input type="checkbox"/> no the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> no it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Does not satisfy:-	

The requirement for sustainable development.

The criteria for sustainable transport – promoted increased car dependency.

Sustainable housing, based on aspirational employment growth predictions.

Effective land use by concentrating on green space over town centre development and brownfield.

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. (1)
- Adequate regional and cross border collaboration has not been undertaken. (3)
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. (1)
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. (1)
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. (4)
- Council statement of "contaminated land sites" [2-15] indicated that 3,710 ha of lowest priority contaminated land exists in St Helens. Two green belt sites of 56.6. ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170 ha available if it were to be remediated. There are numerous empty properties in the borough and buildings that can be changed to residential use. There are areas of land that had residential properties on yet have not been redeveloped, eg Eccleston Street. (4)
- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. (4)
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)

- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane. (4) (2)
- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Ecclestone and rail links are either in town centre or in Sutton. Steve Rotherham, Liverpool City Region Metro Mayor, Steve Rotherham speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : Nathalie Nicholas, Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."* (2)
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed. (2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only interested in large scale, easy to clear land.

To promote local businesses council should commission local building/developing companies to establish local consortiums to develop on the smaller pockets of land.

Those sites that remain undeveloped should be made to finish the project.

Council should continue with projects to develop town centre development/change of use in tandem with it's plan for St Helens transforming our town to have more central living as the high street changes.

When the greenbelt is gone it is gone forever, changing the landscape of the area, there is no need for this.

Plan based on aspirational growth due to the new warehousing being built along the A580, these jobs are often lower paid, whereas building on 8HS is purely to make it easier for large developers to build high priced housing bringing in higher rates to the council and not social housing. Many people cannot get on the property ladder and these developments would not always be in the reach of some people. Demolish the old Tax office in College Street, this is an eye sore and would free up more land that can be used for housing.

Unsafeguard the 8HS site and keep it as agricultural land.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
--------------------------	---	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0256



Representation Forms
Barbara
to:
planningpolicy@sthelens.gov.uk
11/03/2019 16:53
Hide Details

EF0022
SITE 2EA

① - LPA04
② - PARA 1.7.2
DEC

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards
Barbara

Sent from Mail for Windows 10



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title:
First Name: Barbara	First name:
Last Name: Traynor	Last Name:
Organisation/company:	Organisation/company:
Address: 24 Oban Drive Garswood	Address:
Postcode: WN4 0SJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 20 Feb 2019
------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 2EA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

①
②
①

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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PO0257

EFO023

Site KEA

① - LPA04

② - PARA 1.7.2
DEC



Representation Forms

Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:53

Hide Details



3 Attachments



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Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Barbara

Last Name: Traynor

Organisation/company:

Address: 24 Oban Drive

Garswood

Postcode: WN4 0SJ

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: _____

Date: 20 Feb 2019

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☒ Yes (via email)

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Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
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①
②
①

Please continue on a separate sheet if necessary

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Please keep a copy for future reference.

PO0258

EF0024

SITE 6EA

① - LPA04

② - PARA 1-7.2
DEC



Representation Forms

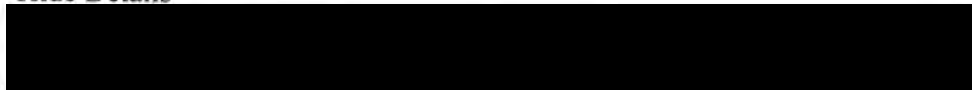
Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:53

Hide Details



3 Attachments

PDF



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf

PDF



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf

PDF



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards

Barbara

Sent from Mail for Windows 10

① - LPA04

EFO024

② - PARA 1.7.2
DEC

SITE 6EA



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

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(we will correspond via your agent)

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First Name: Barbara

Last Name: Traynor

Organisation/company:

Address: 24 Oban Drive

Garswood

Postcode: WN4 0SJ

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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☒ Yes (via email)

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Other documents (please name document and relevant part/section)								

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

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PO0259

EF0025

SIRE IHA

① - LPA05

② - PARA 1.7.2
DTC



Representation forms

Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:54

Hide Details



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



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Regards

Barbara

Sent from Mail for Windows 10

① - LPA05

EFO025

② - PAR 1.7.2.

SITE 1HA

DEC.

Ref: LPSD

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Postcode: WN4 0SJ

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Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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①

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①

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PO0260

EF0026

SITE IHS



Representation forms

Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:54

Hide Details

① -LPA06

② PAR 1.72

DEL

3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

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Regards

Barbara

Sent from Mail for Windows 10

① - LPA06
② - PARA 1.7.2
DLC

EFO026
Sinc IHS



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①

②

①

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PO0261

EF0027

SITE 2HA



Representation forms

Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:54

Hide Details

① - LPA OK

② - PMx 1.72

DCC

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Barbara

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① - LPA05
② - PARA 1.7.2
Dtc.

EF0027
SITE 2H1



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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

①
②
①

Please continue on a separate sheet if necessary

Delete this land from the proposed removal from the Greenbelt

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Please keep a copy for future reference.

PO0262

① - LPA05 ② - Para 1.7.2 DTC
③ - LPA06, 845 ④ - LPA02

Page 1 of 1
EFO028



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

John Gore

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:59



1 Attachment



2019 03 11 lpsd-representation-form - JG.doc

Dear Sir/Madam,

Please find attached my completed comments form.

Yours faithfully,

John Gore



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	
------------	--	-------	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No x
Sound?	Yes <input type="checkbox"/>	No x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	
Justified?	x
Effective?	x
Consistent with National Policy?	x

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486

this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

SHBC have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately, two of the accidents in the last year involved two fatalities, one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goes ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

there is nowhere to build them within the area of 8HS.

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
--	--

100

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0263

Sine 8HS

EF0033



Response to local plan.
Iris Wainwright to: planningpolicy

From: Iris Wainwright [REDACTED]
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form IW.docx

① - PARA 1.7.2

② - LPA02

12/03/2019 09:04

③ - LPA06

④ - LPA06 - SPECIALIST
8HS

Hello,

Please find attached my response to the local plan. Please acknowledge receipt.

Regards,

Iris Wainwright.

Sent from my iPad



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Iris	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

6th March 2019

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐X (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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Merseyside
WA10 1HP**

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Other documents (please name document and relevant part/section)				table 4, section 2.5 of the Liverpool City Region SuperPort document			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> X
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>I understand that the council have a legal duty to cooperate. I can find no evidence to indicate that the council has contacted neighbouring boroughs to discuss their plan. If they have then they seem to have ignored the findings, in particular to the development in the wider area and the increased traffic implications. I refer to Liverpool SuperPort quadrupling the number of LO-</p>

LO (load on – load off) TEUs (twenty foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this (taken from the same document) there will be an increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. Most of this traffic will go by road 22% of this HGV traffic is destined for Merseyside with 35% elsewhere in the North West. This does not mean that the remainder will go by train. Liverpool is unique. Due to its location lorries can do a round trip to the following major locations, Glasgow, Edinburgh, the East coast, London, Bristol and South Wales in a driver's legal hours. In other words goods arriving in Liverpool could leave the port in the morning and be on a shelf in a supermarket in London by late afternoon. Well before a container would have left the port should it go by train.

There is also the development in West Lancashire who are intending to build 6,000 new homes in Bickerstaffe which is just 6 miles from M6 J26 and 6 miles from Windle Island where there is an area of green belt which is planned to become safeguarded for future development. Based on information provided by the Office of National Statistics the development at Bickerstaffe would generate an additional 10,000 vehicles and should the development adjacent to Windle Island (8HS in the local plan) go ahead after 2035 this would generate an additional 1,800 vehicles. This would put additional strain on a road network that is already heavily congested. 8HS is also just 6 miles from J23 of the M6. A junction that is already overloaded at peak times and is predicted to get worse with all the additional LGVs which will be accessing SuperPort and the new warehouses being constructed along the A580 between Liverpool and Haydock.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PO0264

Stn SHS

EFO034

① - PARA 1.7.2

② - LPA02

12/03/2019 10:26

③ - LPA06

④ - LPA06 SPECIFICATION
SHS.



Response to local plan .

David Wainwright to: planningpolicy

From: David Wainwright [REDACTED]
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form DW.docx

Hello,

Please find attached response to local plan

Many thanks.

Sent from my iPad



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: David	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

6th March 2019

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Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X

Please tick as appropriate

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X	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PO0265

EFO035

- ① - GEN
- ② - Para 1.7.2 DTC
- ③ - LPA06, SHS



Local Plan Representation
barton su
to:
planningpolicy
12/03/2019 11:28



1 Attachment



CRBarton Representation March19.doc

Please find attached my Representation on the Local Plan (2018). I would like an acknowledgement at the earliest convenience and trust that this will be forwarded to the Planning Inspector following the due process.

Clive R Barton



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Clive	First name:
Last Name: Barton	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Brooklands Road Eccleston	Address:
Postcode: WA10 5HE	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 12/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy Local Plan 2018		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> x

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> Which National Policy? I assume NPPF(2018)

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Firstly, I will comment on the process of presenting and delivering the Local Plan to meet Legal requirements.

In December 2016, St Helens Council published their Preferred Options and asked for comment. This follows procedure and 5695 responses were received. These responses have been published in The Report of Consultation 2018. I will refer to this later and particularly to the land labelled HA16 (now 8HS).

Following several delays, the Proposed Version of the Local Plan (2018) was agreed by Council in December 2018. It was not unanimous.

The process of responding to this version has been difficult and off putting. The electronic version of the plan contains grammatical errors such as

U NO

5. If you consider the Local Plan is it because it is not:

Please read the guidance note for explanations of the tests of soundness.

The guidance notes are complicated for the general public and refer to seven different policies.

I attended a Drop In session to ask for assistance with this process where I spoke to four Council officers. I asked how the review of the representations would be undertaken and whether the Proposed Version could be altered as a result. Two officers said that minor modifications could be undertaken and one gave the example that housing figures could be altered. I do not believe this to be the case. The quality of advice from the Drop In was questionable and many questions could not be answered. However, St Helens Council appear to have undertaken the process of community involvement. There is little evidence that this was effective or that the Local Communities are being actively involved in the preparation and revision of this Plan.

Secondly I will address the Duty to Cooperate. I have reviewed a wide selection of Local Plans for the Liverpool City Region(LCR) including the LCR Shelma (2017) and compared the housing projections with ONS sources and those produced by GL Hearn for various authorities.

LA	Plan	Housing per year	Years	ONS 2014 SNNP	above baseline	GLHearn LCR Shelma 2017 Baseline Growth	above ONS 2014
Halton	PO 2018 Local Plan	466	2014-2037	254	140	326 565	212
Knowsley	2016 Local Plan	450	to 2028	280	179	271 373	170
Liverpool	2018	1739	2018-2033	1739	877	862 1791	0
St Helens	PSV 2018	486	2020-2035	416	89	397 855	70
Warrington	PSV 2019	945	to 2037	762	-4	949 973	183
West Lancs	PO2018	396 475	2019 - 2027 2027-2050	193	175	221 241	203
Total	Wlancs to 2027	4482		3644	1456	3026 4798	838

It can clearly be seen that all neighbouring authorities, other than Warrington at -4, are targeting above baseline growth. The target levels are based on data that has been superseded by the, more applicable, ONS (2016) – however government have, unfortunately, allowed the Councils to continue to use obsolete figures.

This table reveals that there is a possible regional housing oversupply of 1456, using Baseline data or 838 using the ONS (2014). The Duty to Cooperate has clearly not been fulfilled by the process and the St Helens Proposed Local Plan Version (2018) does not meet the test for Legality, other than by lip service. ②

The sources for the data are as follows

Reference

West Lancs <https://www.westlancs.gov.uk/media/544362/master-lpr-po-v41-final.pdf>
Warrington <https://www.warrington.gov.uk/news/article/2765/plan-set-out-for-warrington-s-future-development>
Knowsley <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>
Halton <https://www3.halton.gov.uk/Pages/planning/policyguidance/pdf/newdalp/written.pdf>
Liverpool <https://liverpool.gov.uk/media/1357189/shlaa2017-volume-a-final-sept-2018.pdf>
West Lancs https://www.westlancs.gov.uk/media/503879/HEDNA_WestLancashire_Mar2017.pdf

My third, and final, issue regards the parcel of land labelled 8HS (formerly HA16).

During the Consultation process in late 2016/early 2017 residents raised relevant and key issues regarding the inclusion of this parcel and its suitability to be developed for housing.

Facts included: the parcel is Grade 1 and 2 agricultural land and currently farmed; the middle section includes a flood plain; it is adjacent to the A580 (a very busy two lane highway connecting Liverpool to Manchester) where pollution levels are high; there is a significant lack of infrastructure in the locality (primary and secondary schools are oversubscribed, there are very few buses, it is 3 miles to the nearest train station) and local highways problems have been declared unfixable. St Helens Council acknowledged these concerns by removing the immediate threat of building over 1000 houses on this unsuitable land and replied that, "As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within the Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review." ③

This is contradictory to published guidance on removing land from Green Belt which must be based on "exceptional circumstances". The Council have openly stated that this land may never be required for development which effectively negates the exceptional circumstances issue as well as opening the door to a challenge from the developer who has already published plans for the parcel.

Finally, I have been grateful to the local group of volunteers who have worked hard to keep residents clearly informed of the process and would like to acknowledge their effort on my behalf.

I have read, and totally support and agree with, the submissions made by ECRA and that of the SHGBA made by Kirkwells.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

x	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0266

EF0036



Local plan comments form

to:

planningpolicy

12/03/2019 12:06



1 Attachment



Council local plan comments.doc

Hi there

Attached is our completed comments form on the local plan. We have posted one but just in case it does not arrive want to send this too.

Mr and Mrs Nick Burke

Site 8HA

①-LPAOK

②-MRA 1.7.2

③-S.A.



St.Helens
Council

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr and Mrs	Title:
First Name: Philippa and Nick	First name:
Last Name: Burke	Last Name:
Organisation/company:	Organisation/company:
Address: 52 Heyes Avenue, Rainford, Sthelens Postcode: Wa11 8AR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12/03/19
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Yes ☐ (Via Email)

No ☐

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PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA02 (site HA8)	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green belt land should only be released in exceptional circumstances. That is official government and council policy and remains a central part of planning law in this country.

There are no exceptional circumstances in St Helens – a borough with a falling population and house prices below the national and regional average. Housing in St Helens is comparatively cheap and in low demand.

The green belt was created to prevent urban sprawl and over-development. It has served that purpose well. The proposals in the Local Plan would undo that good work. St Helens is a borough with few other physical assets and significant health problems such as childhood obesity, high rates of heart and lung disease. Destroying protected green belt land in such circumstances would be a step in the wrong direction given the long-term health trends in St Helens.

Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1. *814A*

This site (HA8) is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142

③

①

8HA
The site (HA8) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which is threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect. There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

St Helens Council wants 486 houses built every year in the borough. But the latest figures from the Office for National Statistics show St Helens only needs 383 houses a year. If these most recent figures from the ONS were used, the amount of building on protected land could be significantly reduced.

The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

These alternatives will have less impact on the environment and lead to less need for new infrastructure. The Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PO0267

① - Green Belt Review 2018

③ - LPA05

⑤ - IDP

Page 1 of 1

② - LPA06, 8HS

④ - GEN

⑥ - Para 1.7.2 EFO037
DTC



Response to Local Plan 2019

Peter & Frances Murphy

to:

planningpolicy

12/03/2019 13:05



1 Attachment



MFM lpsd-representation-form Example 1.doc

Dear Sir/Madam

Please find attached my response, as an Eccleston resident, to the Local Plan 2019.

Yours sincerely

MF Murphy



St. Helens
Council

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Mary Frances	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston St Helens	Address:
Postcode: WA10 4QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	12/03/2019
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Yes ☐ (Via Email)

No ☒

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Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/> No The Plan is based on flawed methodology
Effective?	x <input type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively

①

②

prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Adopt the ONS (2018) Housing Need statistics and remove all Green Belt reallocation from the Plan.

Please continue on a separate sheet if necessary

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NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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PO0268

① - Green Belt Review 2018 ③ - LPA05 ⑤ - IDP
② - LPA06, 8HS ④ - GEN ⑥ - Para 1.7.2
OTC

Page 1 of 1

EFO038



Response to Local Plan 2019
Peter & Frances Murphy
to:
planningpolicy
12/03/2019 13:09



1 Attachment



PM lpsd-representation-form Example 1.doc

Dear Sir/Madam

As a resident and Council Tax payer of Ecclestone, I wish to submit the attached response to the Local Plan 2019.

Yours sincerely

P Murphy



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Ref: LPSD

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Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Peter	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston, St Helens	Address:
Postcode: Wa10 4QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	12/03/2019
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No x ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)			Green Belt Review (2018)		

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/> No The Plan is based on flawed methodology
Effective?	x <input type="checkbox"/> No The Plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No It does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively

①

②

prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Adopt the ONS (2018) Housing Need statistics and remove all Green Belt reallocation from the Plan.

Please continue on a separate sheet if necessary

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NO	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
-----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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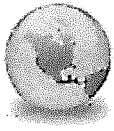
**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO0270

Sinc 8HS

Page 1 of 1

EFOOSO



response to local plan
Debbie Wainwright
to:
planningpolicy
12/03/2019 21:06



1 Attachment



Lppsd-representation formDLW.doc

Please find attached my response to the local plan.

regards,

Debbie Wainwright

① - Para 1.7.2

② - LPA02

③ - LPA06

④ LPA06 - SPECIFICALLY
8HS



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Deborah, Louise	First name:
Last Name Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens, Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	12 th March 2019
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes X ☐ (Via Email)

No ☐

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St.Helens
Merseyside
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map	1.7.2	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				table 4, section 2.5 of the Liverpool City Region SuperPort document					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No x <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> x
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> x

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I understand that the council have a legal duty to cooperate. I can find no evidence to indicate that the council has contacted neighbouring boroughs to discuss their plan. If they have then they seem to have ignored the findings, in particular to the development in the wider area and the increased traffic implications. I refer to Liverpool SuperPort quadrupling the number of LO-LO (load on – load off) TEUs (twenty foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this (taken from the same document) there will be an

increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. Most of this traffic will go by road 22% of this HGV traffic is destined for Merseyside with 35% elsewhere in the North West. This does not mean that the remainder will go by train. Liverpool is unique. Due to its location lorries can do a round trip to the following major locations, Glasgow, Edinburgh, the East coast, London, Bristol and South Wales in a driver's legal hours. In other words goods arriving in Liverpool could leave the port in the morning and be on a shelf in a supermarket in London by late afternoon. Well before a container would have left the port should it go by train.

There is also the development in West Lancashire who are intending to build 6,000 new homes in Bickerstaffe which is just 6 miles from M6 J26 and 6 miles from Windle Island where there is an area of green belt which is planned to become safeguarded for future development. Based on information provided by the Office of National Statistics the development at Bickerstaffe would generate an additional 10,000 vehicles and should the development adjacent to Windle Island (8HS in the local plan) go ahead after 2035 this would generate an additional 1,800 vehicles. This would put additional strain on a road network that is already heavily congested. 8HS is also just 6 miles from J23 of the M6. A junction that is already overloaded at peak times and is predicted to get worse with all the additional LGVs which will be accessing SuperPort and the new warehouses being constructed along the A580 between Liverpool and Haydock.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Local councils and business should speak to each other. There does not appear to be anyone looking at the bigger picture and the implications that all this development will have on the region and the residents left trying to cope with all the problems it will create. They all seem to be looking after their own interests, SuperPort to make vast profits and the councils who are intent on building as many homes as they can get away with in an attempt to replace government cuts with additional revenue from council tax.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

PO0271

EF0092



{In Archive} Representation Form
David Traynor
to:
planningpolicy
21/02/2019 10:59

SHKS 2EA, 5EA, 6EA

① LPA04

② para 1.7.2.

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards
D Traynor



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title:
First Name: David	First name:
Last Name: Traynor	Last Name:
Organisation/company:	Organisation/company:
Address: 24 Oban Drive Garswood	Address:
Postcode: WN4 0SJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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**Local Plan
St.Helens Council
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WA10 1HP**

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**Please use a separate copy of Part B
for each separate comment/representation.**

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 2EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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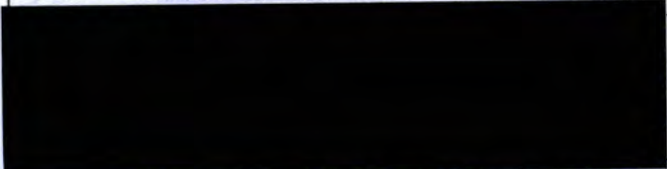
This form has two parts;

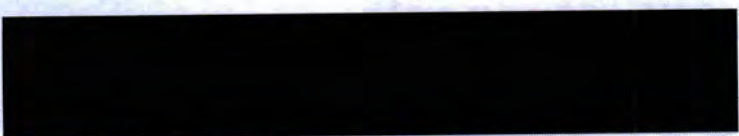
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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>David</u>	First name: _____
Last Name: <u>Traynor</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 Oban Drive</u>	Address: _____
<u>Garswood</u>	_____
Postcode: <u>WN4 0SJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>20 Feb 2019</u>
---	--------------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Other documents (please name document and relevant part/section)									

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

Please continue on a separate sheet if necessary

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Delete this land from the proposed removal from the Greenbelt

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Ref: LPSD

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Part B - Your Representation(s)

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1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: David

Last Name: Traynor

Organisation/company: _____

Address: 24 Oban Drive

Garswood

Postcode: WN4 0SJ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 20 Feb 2019

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☐ No

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Policy	LPA04 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
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PO0272

EF0093



{In Archive} Representation forms
David Traynor
to:
planningpolicy
21/02/2019 11:00

St Helens 1HA, 1HS

+ 2HA

① Policy LPA05

② Para 1.7-2

③ LPA06

3 Attachments



St Helens Comment form LPA05-1HA safeguarded DT.pdf



St Helens Comment form LPA05-1HS smocklane DT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards
D Traynor



St. Helens
Council

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Ref: LPSD

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Tel No:

Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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Other documents (please name document and relevant part/section)									

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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The council needs to prove its population estimates as the population of St Helens has been declining since 1981

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One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this

Please continue on a separate sheet if necessary

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③ - LPA06

②

③

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First Name: David	First name:
Last Name: Traynor	Last Name:
Organisation/company:	Organisation/company:
Address: 24 Oban Drive Garswood	Address:
Postcode: WN4 0SJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 20 Feb 2019
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1
2
1

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PO0273

EF0095

Sites - 2EA, 5EA, 6EA
114, 115 + 2H4



{In Archive} Representation forms
Luke Traynor
to:
planningpolicy@sthelens.gov.uk
21/02/2019 20:27



- ① LPA04
- ② PARA 1.7.2
- ③ LPA05
- ④ LPA06

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse LT.pdf

Please find attached 3 of 6 representation forms

Luke Traynor

Sent from Mail for Windows 10



{In Archive} Representation forms
Luke Traynor
to:
planningpolicy@sthelens.gov.uk
21/02/2019 20:28



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First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Victoria Square
St Helens
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?								
Policy	LPA04 2EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>

Please continue on a separate sheet if necessary

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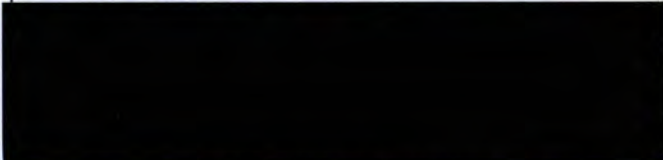
This form has two parts;

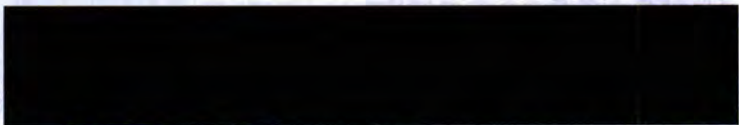
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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: <u>Luke</u>	First name:
Last Name: <u>Traynor</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>192 Victoria Road</u>	Address:
<u>Garswood</u>
Postcode: <u>WN4 0RG</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>20 Feb 2019</u>
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Part B - Your Representation(s)

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(we will correspond via your agent)

Title: Mr

First Name: Luke

Last Name: Traynor

Organisation/company:

Address: 192 Victoria Road

Garswood

Postcode: WN4 0RG

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

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Postcode:

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Signature:

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<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

④
②
④

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title:
First Name: Luke	First name:
Last Name: Traynor	Last Name:
Organisation/company:	Organisation/company:
Address: 192 Victoria Road	Address:
Garswood
Postcode: WN4 0RG	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	LPA05 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

③
②
①

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0274



Eccleston Parish Council Response to Local Plan
Eccleston Parish Council
to:
planningpolicy@sthelens.gov.uk
11/03/2019 10:54



1 Attachment



ECCLESTON PARISH COUNCIL RESPONSE.pdf

Hi

Please find the response from Eccleston Parish Council to the Local Plan.

Regards

Janet Anderson
Clerk to Eccleston Parish Council

ECCLESTON PARISH COUNCIL

CLERK TO THE COUNCIL
Janet Anderson

6 Gorsey Croft
Eccleston Park
PRESCOT
L34 2RT

11 March 2019

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

① - LPA06
② - LPA04
③ - LPA05
④ - IOP
⑤ - LPA08
⑥ - Para 17.2 DTC

Please see below comments from Eccleston Parish Council regarding the St Helens Local Plan –
PLEASE ACKNOWLEDGE RECEIPT.

Section 3: To which part of the Local Plan does this representation relate?

- LPA05
- LPA06
- LPA07
- LPA08

Section 4: Do you consider the St Helens Borough Local Plan 2020-2035 is:

- *Legally Compliant?* **No**
- *Sound?* **No**
- *Complies with the Duty to Cooperate?* **No**

Section 5: If you consider the Local Plan is unsound, is it because:

- *Positively Prepared?* **No** – Plan does not consider Brownfield sites
- *Justified?* **No** – Plan based on flawed methodology
- *Effective?* **No** – Plan is not deliverable
- *Consistent with National Policy?* **No** – Plan does not comply with NPPF 2018

Section 6 and 7: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

And

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

General Overview

Positively prepared?

Eccleston Parish Council believes that the predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over-supply of housing. The figures quoted in the plan (ONS 2014) should be replaced by the more up-to-date ONS (2016) which uses more current data.

The Local Plan is unsound because it has not been positively prepared.

Justified?

St Helens has more than enough land (previously developed brownfield and contaminated land) to meet local housing need. Therefore, there is no need for the land South of A580 between Houghtons Lane and Crantock Grove (8HS) in Eccleston and Windle & the former Eccleston Park Golf Club site (3HS) to be removed from the Green Belt and so-called "safeguarded".

The very fact that the land is proposed to be "safeguarded" for 15 years supports this statement, with enough land in place to provide this Borough's housing requirement during the Local Plan period (2020 – 2035). There are no exceptional circumstances for the land to be released from the Green Belt and it should remain so, until evidence can be provided to support such exceptional circumstances.

The Local Plan is unsound because it is not justified.

Effective?

The Infrastructure Delivery Plan is particularly weak. In the areas suggested for housing development, there are already school's shortages and major transport problems. In particular, the 8HS and 3HS sites have considerable highways and local infrastructure issues, which are highlighted within the St Helens Green Belt Review 2018 document and as such, no development should be considered on either site.

The Local Plan is unsound because it is not effective.

Consistent with National Policy?

The Plan does not comply with NPPF (2018) as it was written prior to publication. Neither does it consider the more accurate and up-to-date housing and employment statistics in ONS (2016) figures. Furthermore, St Helens Council has not provided any evidence to date that they have satisfied their 'duty to cooperate', which is essential, especially within the context of neighbouring local authorities, who are also bringing forward their own Local Plan's, such as Warrington, West Lancs and the Wirral.

The Local Plan is unsound because it is not consistent with National Policy.

Conclusion

Taking all of the above cumulatively, Eccleston Parish Council believe that the local plan in its current form – when examined by the Planning Inspector, cannot be justified, effective,

PO0275

E10052



Response to St Helens Council Local plan

Christine Sterry

to:

planningpolicy@sthelens.gov.uk

11/03/2019 11:21

Hide Details

JHC 8HA

① - LPA05

② - D1C

③ - S.A.

Response from
Mrs Christine Sterry

I would like to be kept updated of future stages of the St Helens borough plan for 2020-2035

I object on the basis of LPA02, LPA05 and 06 of the St Helens Local Plan with specific reference to HA8. (This is all too complicated for me to digest so forgive me if I've got the numbers wrong!)

I believe it to be unsound on the basis that it has not been positively prepared, it is not justified nor effective.

The council has used ONS 2014 statistics to support its plan, when ONS 2016 statistics are available. This is obviously because they suit their needs better. St Helens is a town in population decline, and therefore the only reason for using old statistics is that it suits their higher housing targets. These higher than necessary housing targets mean that the council will use Grade 1 agricultural land from the Greenbelt to build houses purely to generate extra council tax revenues. They are being severely over optimistic in their assumptions on the level of land required to meet their obligations on setting a local plan. Natural England have not been consulted with regard to the loss of Grade 1 agricultural land, which once lost to farming, reduces food crops and loses local farming jobs.

No sustainable infrastructure has been identified or planned therefore an already busy and dangerous (from a point of vehicular traffic) village will just get worse. In the Summer of 2017 an elderly lady was mowed down and killed along Church Road, nothing has changed since then in terms of road layout, speed, access to vehicles, and therefore what has happened in the past can happen again. There are no new schools planned, no new doctors surgeries or dentists. 259 houses would put over 1000 extra people into the village which is a 13% increase in size. It would place approximately another 83 people on the doctors waiting lists each week, and extra demands on dentists and schools. None of these could cope.

St Helens local plan does not plan to bring high skilled and therefore high paid jobs to the town, therefore houses in Rainford would not address any housing situation for the general populous of St Helens, they would attract more commuters putting more cars onto the Rainford by-pass and the East Lancs Road. Current Windle island improvements have not considered the extra volume of cars that this plan should it be passed would put onto that junction, therefore chaos will reign once again.

I do not believe that adequate regional and cross border collaborations has been undertaken. The housing need assessment shows no case for "Exceptional" circumstances by which Greenbelt could be justifiably released. They have failed to co operate with other councils and have not published any statements of common ground.

St Helens is a former industrial town and until recently the council did not have until recently a register of Brownfield sites. There are many previously developed and currently what is described as "Contaminated" sites that should be considered in full before any Greenbelt be considered. These are reasonable alternatives and would have less impact on the environment and less need for infrastructure (that is not proposed in the plan). St Helens council and Liverpool City Region Combined Authority have no policy for bringing unsuitable sites back into use. These lazy councils don't want to regenerate they'd rather get the "Quick wins" from Greenfield development. What is to happen to these sites if they are not used for housing? They will remain blots on the landscape. I cannot believe that within the next 15 years enough of these sites cannot be remediated to avoid using Greenbelt land.

There are at least 900 long term empty homes in St Helens. Whilst I cannot find any information on the numbers that St Helens Council have got back into occupancy, whenever I have enquired I get the response that the council are working with the landlords. There are at least 5 houses that I am aware of in Rainford that are long term empty. 900 houses back into occupancy could eliminated many parcels of Greenbelt land being developed

on. The council are taking the easy route of building in semi-rural Rainford which will yield high council taxes for their coffers rather than concentrating on getting existing houses back into use, which they are already getting council tax for even though empty.] ①

The Councils own "Sustainability Appraisal" shows 4 sites with negatives, 3 of which have been discarded. HA8 has not, with no explanation of why. Furthermore HA8 is next to an industrial area (which is also planned to be developed further) where a recent fire and explosion took place. Again like the fatality on Church Road, nothing has changed since this occurrence, so the potential for it to happen again remains. Other sites again have been removed on the basis of similar locations and risks. It is obvious that Rainford is being targeted by the Council as it is a high house price, high council tax paying village within the Borough. The council have used scare tactics in announcing masses of Greenbelt land snatching in its original proposal only to settle on HA8. This is scare tactics and best extremely poor conduct of the council.] ③
] ①

Thank you for reading and considering my objections

Christine Sterry
[REDACTED]

PO0276

E10064



St Helens Local Plan Representation - site HA8 Rookery Lane Rainford
 Mark Harley
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 18:19

Site BH1

① - LPA05

② - DLC

③ - S.A.

Hello,

My Wife and myself would like to strongly object to the St Helens Local Plan specifically to site HA8 Rookery Lane Rainford.

Mark Harley & Jacqueline Scott-Harley
 4 Green Lane
 Rainford
 St Helens
 WA11 8EJ

The reasons for our representations and objections are as follows.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

S.A.
M004

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

④

259 houses is a huge development. It could put 1,000 extra cars on Rainford's roads with implications for air

pollution, congestion and road safety. Higher Lane is already a busy road and, at certain points, dangerous. The recent Windle Island roadworks at the Rainford bypass/East Lancs Road junction has proven how dangerous this could be with several reports of accidents resulting in death. Rainford Village has also seen a significant increase in traffic which is not sustainable and also dangerous as drivers use the village as a bypass whilst the roadworks are being completed.

This will have a negative impact on local schools, business's, surgeries etc which are already running at more than 100% capacity.

We trust our representations and objections will be reviewed.

I look forward to hearing from you in due course.

Regards,
Mark Harley & Jacqueline Scott-Harley

PO0277

LE10066



Response to St Helens Borough Local Plan 2020-35 Submission Draft (LPSD) Respinse

Tony Lewis

to:

planningpolicy

11/03/2019 18:38

① LPA 04

② LPA 05

③ PARA 1.7.2

With respect to the St Helens Borough local plan 2020-2035 submission draft, we have the following comments :-

The submission, whilst an improvement on the 2016 draft proposals, is based on economic and demographic growth scenarios which are not substantiated either by historic data or the latest outputs from the Office of National Statistics (ONS).

In addition the government itself is questioning standard methodology for existing housing targets. Consequently the plan and its impact on the green belt etc is based on both data and methods which are being questioned. The so called "transformational strategy" is a high risk strategy rather than a more prudent strategy based on recent historic data particularly in terms of a slower economic growth which reflects what is actually happening.

The impact of a more conservative growth scenario in which new economic activity reflects actual growth rates has either seemingly been ignored or possibly not examined in depth by the council. This raises the suspicion that the proposed plan is based on untested "circular arguments" founded on hypothetical growth figures rather than one based on sound data and information reflecting actual growth, migration and demographics. The "economic Activity" consultancy report refers to the difficulty of forecasting 20-30 years into the future based on hypothetical changes. The Councils "transformational approach" leads to a high risk plan with detrimental consequences for land use, particularly, Green belt in the Borough. A more conservative approach is necessary.

A more conservative growth scenario, raises the possibility that Brownfield sites could meet the future land requirements for industry and domestic needs. This would be enhanced if further proposals are brought forward in the plan to deal with low-level contaminated land which represents a substantial area of the borough. This appears to be an opportunity missed by the council. The cost of any cleanup has to be measured against the permanent loss of good-quality land. Such a comparison is not evident in the plan.

Dealing with Brownfield/Contaminated land, as part of this plan, would significantly enhance the borough bringing benefit for all its residents.

It would also appear that the ambitious annual number of housing completions is not currently capable of being met by the construction industry based on historic data. This again calls into questions a growth scenario which results in loss of both valuable greenbelt land over the next 30 years. If there is a legal requirement to identify areas of land safeguarded for future development, why cannot these plots of land be left in the green belt for now and be re-examined nearer the relevant time, based on better data and information.

Changing the greenbelt is irreversible and should be based on accurate data and not on a risky growth scenarios which appears unrealistic in both the short and longer term.

Further questions are raised on the compatibility of the proposed St Helens plans with neighbouring councils plans. These councils will have equal aspirations for growth. Although part of the Liverpool city region, only limited evidence is provided of the degree of consultation with the adjacent councils in the City region and with the neighbouring councils of Wigan and Warrington. If all councils adopt

③ - Para 1.7.2
DfC

transformational strategic plans, the result will be an over supply of houses and a subsequent increase in brownfield sites with destruction of valued undeveloped land.

10

In addition, it is noticeable that around the borough, many small to medium housing sites begin development. They then stop for many years usually at the "footings" stage. Whilst in planning numbers terms houses are being built, in reality they are not. The council, within the plan, should be putting forward proposals to ensure housing completions if a complete nonsense is not to be made of the planning process.

Within the draft plan, Infrastructure and Environmental developments are indicated as being necessary but without detailing what types of improvement will be sought and whether realistically they can be funded. This represents a missed opportunity to make firm commitments to the residents of the borough in areas which impact them directly. As an example Eccleston Mere and the land around it represent a fantastic amenity with great potential for the Borough, provided accommodation can be reached with the owners - an area where the Council needs to take a lead coordinating role.

In conclusion, the draft plan as submitted is **unsound and not justifiable** for a number of reasons including those indicated. It needs to be **modified** to be based on realistic growth figures with maximum exploitation of sites of brownfield and contaminated land for development. No changes to the Greenbelt should be made to create Safeguarded sites at this point in time. The need for these sites should be re-examined, based on the latest historic data and trends, nearer the end date of the plan.

Tony Lewis/ Marjorie Lewis

12 Orchard Hey, Eccleston, St. Helens, Merseyside WA10 5AQ

PO0278

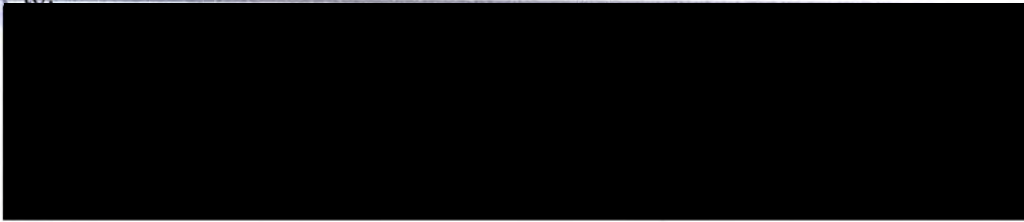
EL0067



Local Plan Response

Steve Muskett

to:



① - IDP

② - GBR

③ - SA

④ - LPAOK

⑤ - LPAOK ^{TABLE} 4-4

⑥ - Pre

1.7.2 - DLC

1 Attachment



LPSD - Submission Document_20190311.pdf

Please find attached my response to the Local Plan.

I would kindly request acknowledgement of this email and receipt/ acceptance of my response to avoid unnecessarily printing and hand delivering to the Town Hall.

Many thanks,

Steve Muskett
12 Hamilton Road
Windle
St Helens
WA10 6HG

St Helens Borough Local Plan 2020-2035 (Submission Draft)

PART A

Title: MR
First Name: STEVE
Last Name: MUSKETT
Address: 12 HAMILTON ROAD, WINDLE
Postcode: WA10 6HG
[REDACTED]

Signature: [REDACTED]

Date: 11th March 2019

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

No, I do not wish to participate at the oral examination

5. Final Comments - *GENERAL*

- 5.1. If the green belt review is deemed necessary, it produces land for almost 3000 dwellings beyond the plan period.
- 5.2. What is the need to Safeguard land for a further 3000 dwellings?
- 5.3. The LPSD already states it is expected that housing requirements beyond 2035 will be lower but even at 468, less the continued windfall sites at 93, there will be almost 8 years housing supply (2955/(468-93))
- 5.4. Are the Council really stating that in 15 years' time they will still not have remediated some of the 3000 plus contaminated hectares of land?
- 5.5. If that is the case, it clearly demonstrates that release from green belt is not the best policy.
- 5.6. I do not see any evidence in the LPSD of a Duty to Cooperate with other neighbouring councils.
- 5.7. There are many comments from Knowsley and Warrington, expressing concerns about St Helens plans, which points to not communicating.
- 5.8. All neighbouring councils are chasing this same growth – where are all the people coming from?
- 5.9. Whilst the council have carried out the Flood Risk Assessment, there does not appear to be any Sequential Test that has been performed.
- 5.10. If we assumed that 8HS was entirely in Windle which in the 2011 Census consisted of 3607 houses, the development there would be a 28% increase to the size of Windle
- 5.10.1. That cannot be sustainable!
- 5.11. If we assumed that 8HS was entirely in Eccleston which in the 2011 Census consisted of 4218 houses, the development there would be a 25% increase to the size of Eccleston.
- 5.11.1. That's cannot be sustainable
- 5.12. As it is, it is shared between the two neighbouring parishes but even at 12-15% growth, it would cripple the local infrastructure.
- 5.13. By releasing green belt land the plan does not achieve sustainable development.

6. Question 7 - *SUGGESTED AMENDMENT*

- 6.1. Economic data needs to be urgently reviewed using more up to date information
- 6.2. Employment land requirements can then be looked at properly in an Objectively Assessed manner instead of the supply-side review that has taken place
- 6.3. Housing needs will then need to be updated to better reflect the reality instead of being inflated by aspirational employment growth figures
- 6.4. The Duty to Cooperate needs to be evidenced to show what regional strategy discussions have taken place and how as a region, they can be delivered.
- 6.5. Agricultural requirements need to be better assessed and not just brushed to one side because the bulk of land happens to be agricultural – food security could be key following Brexit.
- 6.6. The Green Belt Review (if required) needs to be properly assessed and scored consistently instead of the subjective method utilised which scores 'like' parcels differently.
- 6.7. It cannot be a sound plan in the absence of any policy on recovering contaminated land and the council should be held to account to recover this and not take the easy option of green belt
- 6.8. The plan is not consistent with NPPF by ignoring green belt purpose 5 and this should be reviewed
- 6.9. The Sustainability Appraisal should be re-done using actual data and not misleading rationales in order to make sites appear better than they are.

PO0279



Residential and industrial building within Rainford . Objections to planning .
lan to: planningpolicy

11/03/2019 21:27

LLO069

Site BH4

①-LP05

②-DEC

③-S.A.

St Helens Council,

I send this email as a follow up to my previous submission. I am disappointed that you have chosen to continue with your chosen path of building within the Rainford area and set out my objections as follows.

I have read with interest your latest version of the Local Plan. It seems to me that St Helens council are being deliberately over optimistic in the requirement for housing within the borough based upon an expectation that the recent declining trend for people to live within the borough will reverse by developments outside of it. However specifically in respect of the overall figures within the Plan;

1. It would appear that you are extolling that there are exceptional circumstances to justify not using the standard method to calculate housing need. There are no exceptional circumstances.

2. Therefore your economic analysis appears to be flawed and, based on my previous submission, you make over-optimistic assumptions about the role St Helens will play within the Mersey Gateway. We have, as a borough, continued to see a decline in the numbers of people living, and wanting to live, within St Helens. Therefore, again, the level of land required will be lower than you estimate and certainly lower than set out in the Local Plan.

3. It therefore follows on that if the requirement is lower than you artificially inflate, there are no exceptional circumstances to change Green belt boundaries within the borough bearing in mind that, it would appear that other reasonable alternatives have not been fully explored. This would include being realistic in setting lower target figures and using more of the previously developed land that exists within the borough. More work needs to be undertaken on utilising brown field sites before Grade 1 farming land is destroyed.

4. There is no doubt that Rainford currently lacks the infrastructure to support another 249 houses of the size that will no doubt be built. The current road structure barely copes with the current traffic, with multiple accidents occurring at Mill Lane/Higher Lane and regular blockages within Pasture Lane. Without significant investment with infrastructure and services, Rainford will cease to be function and those services available will be insufficient for the communities needs.

5. Little or no consultation appears to have been undertaken with other locally based Councils in respect of a regional requirement. There are already many building programmes underway in surrounding areas and a massive development envisaged by West Lancashire that will see Rainford more or less joined with areas within their catchment. With very limited infrastructure in these proposed areas, Rainford will be the nearest focal point for people living within this proposed catchment area. I have not seen a statement of common ground that shows good faith as to how this housing and industrial jigsaw will ensure that the over provision of housing and industrial areas will not be out of synchronisation with actual realistic demand.

6. In relation to the specific site HA8 (Rookery Lane), I make the following points;

This area is Grade 1 agricultural land, farmed continually and producing valuable resources for the local and national population. In an uncertain time of Brexit, we cannot afford to limit our ability to produce our own food within the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The St Helens Local Plan is intended to promote employment and economic growth yet this will have the opposite effect. There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. (0)

This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142.

Only four sites score four negatives (red grading) on the Sustainability Appraisal, and the other 3 have all been discarded. So St Helens Borough Councils's own assessment is that HA8 (Rookery Lane/Higher Lane) is the least appropriate Green Belt site allocated for housing in Phase 1. There appear to be double standards being applied, sceptically I would appraise for financial benefit (increased Council Tax revenue). (8)

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

Thank you.

Ian Valentine
3 Sandon Grove
Rainford
WA11 8AU

Julie Valentine
3 Sandon Grove
Rainford
WA11 8AU

Sent from my iPad

PO0280

660071



Local Plan Objection HA8 Rookery/Higher Lane, Rainford
 carol P
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 23:44

5/11/8/14
 ① - LPA05
 ② - DLE
 ③ - S.A.

We write to strongly object against release of Green Belt land in Rainford - specifically Rookery Lane / Higher Lane (HA8).

There are no exceptional circumstances in St Helens housing need to justify destroying the green belt - St Helens Local Plan figures do not justify releasing land from the green belt. The predicted population assumption is greatly flawed and can only be a figure plucked out of nowhere. In addition, there has been no amalgamation of the needs of neighbouring areas such as Wigan and Warrington which is deeply concerning.

In reference to the Sustainability Appraisal, the council's own assessment shows that HA8 is the least appropriate site allocated for housing.

There are many areas in St Helens which are not designated as Green Belt and which would benefit greatly from considerate development - the council is not adopting a brownfield first policy and I fear those areas which would be enhanced by development will be left to rot and the chance to improve those areas will be lost forever.

The land at HA8 is next to an industrial area - other sites considered by the council were rejected for being near similar industrial sites.

The land is already used for an important purpose. It is Grade 1 agricultural land which is used to grow food - there are no exceptional circumstances which would warrant a change of use of this land.

The infrastructure of Rainford is already bursting at the seams. The Doctors' Surgeries already have more patients than they can cope with, the schools are full, drainage and flooding is problematic and parking is already extremely challenging in the village.

A more visionary approach to development must be adopted which does not allow the unlawful destruction of this area which is already a complete and attractive successful community. It is the green belt surrounding Rainford which gives it its very identity.

From:
 Carol Pritchard
 David Pritchard
 133 Higher Lane, Rainford, St Helens, WA11 8BJ

Sent from Outlook

PO0281



Local Plan Submission Draft
 pat Kitto
 to:
 planningpolicy@sthelens.gov.uk
 12/03/2019 12:14

EL0085

SIN 844

① - LPAOK

② - DIC

③ - S.E.

My Names is Pat Kitto of 10 Rookery Lane, Rainford, St Helens, WA11 8EF and I wish to make the foillowing representation on the Local Plan Submission draft:

In respect of the overall figures in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement (s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

SIN 844

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

①

Thank you for your consideration

Pat Kitto

PO0282

L0087



LOCAL PLAN SUBMISSION DRAFT

Nick ffrench

to:

planningpolicy@sthelens.gov.uk

12/03/2019 12:24

① - LPA01

② - DEC

③ - S.A.

My Names is Nick ffrench of 10 Rookery Lane, Rainford, St Helens, WA11 8EF and I wish to make the following representation on the Local Plan Submission draft:

In respect of the overall figures in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

SUGA MOD

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

①

Thank you for your consideration

Nick ffrench

PO0283

E60090

① - LPA06

② - Para 1-7.2



green belt

CllrBGrnewald to: [REDACTED] planningpolicy

12/03/2019 12:31

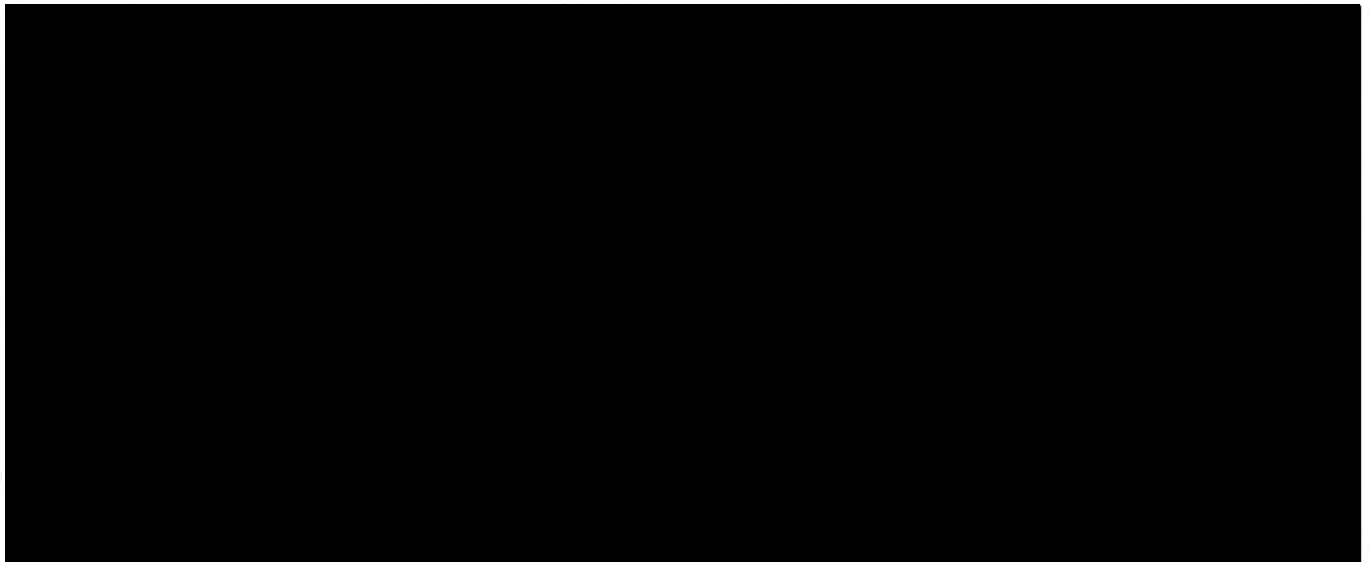


1 attachment



Green belt letter.doc

My response to local plans I'm happy for it to be published





St. Helens Council

Planning Policy Team
St. Helens Council
Town Hall
St Helens

Town Hall
Victoria Square
St Helens
Merseyside
WA10 1HP

Rainhill Ward Councillor

11th March 2019

Local Plan Preferred Options Report – Comments

The following comments are made in response to consultation on the St. Helens Local Plan Preferred Option Report

I deplore this Government's changed policy that requires all local councils to assign *even more* land for development into at least a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land across Rainhill.

I wish to place on record that it shares residents' concerns that the proposal would:

Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;

Have a detrimental effect on highway safety, for vehicles and pedestrians alike; increase the pressure on schools and nurseries, which are already over-subscribed;

Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;

Exacerbate existing health problems for residents, due to increase vehicle pollution; and increase air pollution

Be detrimental to residential amenity, due to the loss of Green Belt.

I also believe that the proposed Halsnead Village development in Knowsley will add pressure to existing infrastructure and services, once it starts to be developed, and we are on record as expressing our concerns on several occasions and asking St Helens Council to prepare for the consequences of Knowsley Borough's action.

Therein no statement of common ground with neighbouring authorities

Yours faithfully

Councillor Barrie Grunewald
Rainhill Ward Councillor

PO0284

E10094



St Helens Borough Local Plan 2020-2035: Submission Draft - Representation from
Billinge Chapel End Parish Council

Tom Kelly

to:

planningpolicy

12/03/2019 14:03



1 Attachment



Local Plan Representation MARCH 19.pdf

I am attaching a representation from Billinge Chapel End Parish Council

Many thanks

Tom

Tom Kelly

Clerk to the Council and Responsible Financial Officer

Billinge Chapel End Parish Council | Public Hall | Pingot Road | Billinge | WN5 7LX |





Billinge Chapel End Parish Council

Public Hall, Pingot Road, Billinge, WN5 7LX

12 March 2019

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

Dear Sirs

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Reference AC06 – Barrows Farm, Carr Mill Road, Billinge

I am writing on behalf of Billinge Chapel End Parish Council about an anomaly in the Submission Draft proposals that is not in the interests of residents. Under the "Correction of Green Belt Anomalies", the Draft recommends site AC06 (Barrows Farm, Carr Mill Road) should be released from the Green Belt. Residents are very concerned about this proposal and the likely impact on the area.

The Parish Council considers the Submission Draft proposals are unsound as they are not consistent with national policy and cannot be justified. It is also concerned about the process of community consultation and the duty to cooperate. The reasoning behind these concerns is set out below.

Soundness

Encroachment

Under the National Planning Policy Framework (February 2019), the Green Belt serves five purposes, including "to assist in safeguarding the countryside from encroachment" (para 134). The Submission Draft refers to the proposed change as a "minor adjustment to the Green Belt boundary" (Green Belt Review: table 6.1). However, the Parish Council believes this adjustment will lead to further encroachment into the Green Belt.

There are several businesses on the "Barrows Farm" site, including an area where enforcement action was taken following the unauthorised use of land as a hardstanding to store vehicles, plant and machinery. Although this area won't be affected by the proposed boundary change, it has the same owner as the remainder of the Farm. A history of retrospective planning applications and unauthorised development does not bode well for safeguarding the countryside and is likely to

Duty to cooperate

The process of community involvement in developing the Plan has not been followed properly. The Council's Revised Statement of Community Involvement (November 2013) states that at submission a report will be prepared outlining "the number of representations made and a summary of the main issues raised in those representations" (para 9.2).

Residents were not included in the initial consultation for the Local Plan Preferred Options in 2017. This was subsequently addressed with residents and the Parish Council given an extended deadline to make representations. Both the Parish Council and residents did make representations. In addition, a district councillor and resident met with officers to highlight their concerns.

The Council's Local Plan Preferred Options Report Of Consultation - December 2018 sets out a summary of the main issues raised by representations and how these were addressed. Despite the level of concerns from residents, district councillors and the Parish Council, their representations are not mentioned anywhere in the 265 pages of the Report on Consultation. I am not sure how the Council defines "main issues" but it is disappointing that this level of community concern has had no impact. I realise that there are many significant issues arising from the consultation, but it appears that community views have been ignored on this matter.

We are happy about the effectiveness of the overall process of consultation. However, there is some doubt whether the duty to cooperate under section 20(5) of the Planning and Compulsory Purchase Act 2004 has been met regarding the proposals to change the Green Belt designation of Barrows Farm.

Conclusion

The Parish Council believes the proposal to change the boundary is unsound; it does not comply with National Planning Policy Framework and has not been justified. We also have concerns about whether the duty to cooperate under section 20(5) of the Planning and Compulsory Purchase Act 2004 has been met.

We therefore believe the proposed boundary change in AC06 should be deleted from the Submission Draft. As an alternative proposal, ward district councillors have met Planning Officers and proposed the Greenbelt Boundary be realigned along the rear garden fences of the properties standing on Carr Mill Road and that the cluster of converted farm buildings remain in the Greenbelt. The Parish Council would support this proposal.

The Parish Council would be happy to participate in the oral examination of the Plan.

2

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✓

Yours faithfully



Tom Kelly

Clerk to the Council and Responsible Financial Officer

PO0285

1510096



Policy No. LPA05 and LPA06
Sharon O'Connor
to:
'planningpolicy@sthelens.gov.uk'
12/03/2019 14:23

Since 8/11/14
① - LPA05
② - DBC
③ - S.A

TO WHOM IT MAY CONCERN

I would like to make my comments of the above policy numbers.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

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For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Sub
M201

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③
①

Kind regards
SHARON OCONNOR
12 MILL LANE
RAINFORD
ST HELENS
MERSEYSIDE
WA11 8LW

PO0286

ELO111



Representation on the Local Plan Submission Draft
 Stephen Hoyle
 to:
 planningpolicy@sthelens.gov.uk
 12/03/2019 17:24

SHC SHA

① LPAOS

② Para 1.7.2

③ S.A.

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St.Helens.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

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②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St.Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site (HA8) (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So St.Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

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effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Yours faithfully

Mr Stephen Hoyle
174 Higher Lane
Rainford
St. Helens
WA11 8BH



PO0287

E60115



St Helens Borough Local Plan 2020-2035, representations/comments
 Joseph Worsley
 to:
 planningpolicy@sthelens.gov.uk
 12/03/2019 17:40

J17C 8HA

① LPA08

② para 1.7.2

③ S.A.

To whom it may concern:-

Name:- Joe Worsley

Address:- 344 Ormskirk Rd, Rainford, St Helens, WA11 7ST

My representation/comment with regards to the St Helens Borough Local Plan 2020-2035

In respect of the overall figures in the Plan, there are no exceptional circumstances to justify not using the standard method to calculate housing need. The economic analysis used is flawed and based on over-optimistic assumptions. And because of this, the level of land needed is therefore not as high as set out in the Local Plan.

So exceptional circumstances to change Green belt boundaries are not existing.

We have found that other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane):-

• Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.

• The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

• There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I am therefore against the local plan as it stands until it has been shown to prove that figures have been updated/calculated using up to date data and all avenues with regards to preserving the Green Belt and using up brownfield sites, have been addressed.

KR - Mr J Worsley

PO0288

660118



St Helens Borough Local Plan 2020-2035, representations/comments
 Marie Worsley
 to:
 planningpolicy@sthelens.gov.uk
 12/03/2019 17:46

Name:- Marie Worsley

Address:- 344 Ormskirk Rd, Rainford, St Helens, WA11 7ST

My representation/comment with regards to the St Helens Borough Local Plan 2020-2035

In respect of the overall figures in the Plan, there are no exceptional circumstances to justify not using the standard method to calculate housing need. The economic analysis used is flawed and based on over-optimistic assumptions. And because of this, the level of land needed is therefore not as high as set out in the Local Plan.

So exceptional circumstances to change Green belt boundaries are not existing.

We have found that other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane):-

<!--[if !supportLists]-->• <!--[endif]-->Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

<!--[if !supportLists]-->• <!--[endif]-->This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

<!--[if !supportLists]-->• <!--[endif]-->The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

• <!--[endif]-->There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I am therefore against the local plan as it stands until it has been shown to prove that figures have been updated/calculated using up to date data and all avenues with regards to preserving the Green Belt and using up brownfield sites, have been addressed.

KR - M Worsley

PO0289

ELO119

SITE 8HA

①-LPHOK

②-PA 1-7.2

③-S.A.



Local plan
Georgina Wilding
to:
planningpolicy
12/03/2019 17:49

I have some points to make about the St. Helens local plan:

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

①

②

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

①

Regards
Georgina Wilding

111 Bushey Lane,
Rainford,
St helens,
WA11 7TE

PO0290

E60123

S11K 8HA

① - LPA05

② - Para 1.7.2

③ - S.A.



Local plan - Rainford

julie

to:

planningpolicy@sthelens.gov.uk

12/03/2019 19:16

Dear Sir

I would like to raise some points with regard to the building of a large number of houses on green belt land in Rainford.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

①

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Rainford Specific points (HA8 - 8HA Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

①

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Margaret Julie Henry

PO0291



Local Planning Consultation HA (Rookery Lane)
pippa wisedale
to:

12/03/2019 19:20

8178HA

ELO124

① - LP105

② - PAR 1.7.2

Mrs June P Wisedale
89 Heyes Avenue
Rainford
WA118AP

The site has been selected when it is the least appropriate Green Belt site allocated for housing in Phase 1

Why select land that is near an industrial site, so would be at risk from industrial activity such as pollution, explosions, I also note that other sites have been excluded due to being near similar industrial sites. (SHL22 2016 ref 16M & 142)

The site is grade 1 agricultural land and is actively used, so therefore provides jobs which the plan says is intended to promote employment so this is counterproductive.

Should you not have consulted with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

With regards to the rest of the plan there seems reason why you have not used a standard method to calculate housing need.

The economic analysis is flawed and based on over optimistic assumptions, meaning that the level of land needed is therefore not as high as set out in the local plan. Which means there are no exceptional circumstances to change Green Belt boundaries.

You have failed to fully explore reasonable alternatives such as using previously developed land, which in return would have less impact on the environment and lead to less need for new infrastructure.

You have failed to co-operate with other councils and have not published any statement(s) of common ground.

I wish all my points to be considered before these plans go ahead. Because for all these reasons & unless the plan is significantly modified it should fail both the legal tests it has to pass the tests of soundness.

JP Wisedale
12/03/2019

PO0292

EL0129

Site SHA



St Helen Local Plan comments for submission
Carolyn Barton to: planningpolicy

12/03/2019 20:36

1 attachment



image1.jpeg

① - LPA05

② - PPA 1.7.2

③ - S.A.

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SUGGESTION
MOD

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

①

• There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.]①

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time /

Mrs Carolyn Barton
Mr Gregory Barton



232 Higher Lane
Rainford
St Helens
WA11 8NH



PO0293

ELO132



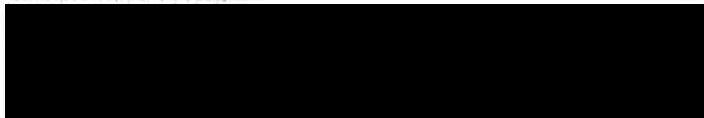
Local Plan Representatioin

hunt elaine

to:

planningpolicy

12/03/2019 21:28



1 Attachment



Local Plan letter John Hunt.docx

Please find attached a joint representation regarding the Local Plan.

Mr JA and Mrs E Hunt

Site 8HA

① - LPAOK

② - PARA 1.7.2

③ - S.A.

Dear Sir/Madam,

Please find below a joint representation on behalf of my family regarding the St Helens Borough Local Plan 2020-2035.

We have noted issues relating to the entire plan but with particular reference to policies LPA02, LPA05 and LPA06 regarding the need for housing and the circumstances surrounding the justification for release of Green Belt Land.

Official government and council policy states that Green Belt land should only be released in exceptional circumstances. This remains a central part of planning law in this country. St Helens is a borough with a falling population with house prices both below the national and regional average. Evidence shows that housing in St Helens is comparatively cheap and in low demand. The council want to build 486 houses per year, however, the figures from the Office of National Statistics show St Helens only needs 383 houses a year. Taking this into account, the economic analysis used to create the plan is flawed and based on over-optimistic assumptions that the need for housing is far greater than is actually required. Therefore, there are no exceptional circumstances to justify not using the standard method to calculate housing need in St Helens. If the council took these into consideration and created the plan appropriately with reasonable housing numbers, there would be no need to release any Green Belt land at all.

A secondary concern is the lack of consideration given to exploring more reasonable alternate options that would be more beneficial to developing St Helens effectively. The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply - even on its inflated figures - for 12 years. Why is this not being utilised? If the council were to lower target figures to the level that is genuinely required and ensured development is placed on previously used or Brown Field sites it would help to expand the town and effectively 'clean up' the areas that do need to be developed. These alternatives would have less impact on the environment and lead to less need for new infrastructure - infrastructure

that would require the release of further land. To add, the council have failed to co-operate with other councils and have failed to publish any statement of common ground.

②

Relating our comments specifically to plot ^{SHA}HA8 (Higher Lane/Rookery Lane, Rainford) we believe the repercussions of development on this land would be catastrophic. The reasoning behind the release of this piece of land is flawed. The site is next to an industrial area and subject to risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land (see SHLAA 2016 site assessment ref 16m and 142). Plot HA8 is still being considered and yet almost identical plots have been classified as inappropriate. Only 4 sites score 4 negatives on the Sustainability Appraisal. The other 3 have been discarded, however, the council's assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1. Clear anomalies are present.

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③

It is of great concern that the majority of these Green Belt sites (in particular HA8) are Grade 1 Agricultural Land which is actively used and regularly farmed. HA8 is arguably one of the most fertile lands in the region. This land provides not only food but employment in the agricultural sector which is threatened by the proposed removal of this site from Green Belt protection. The local plan is intended to promote employment and economic growth and yet this will have the opposite effect. At a time when Britain is facing an uncertain financial and economic future (with the prospect of a no-deal Brexit) we should be striving to maintain thriving local business and employment, particularly those areas that provide food supply. To implement a plan that could potentially damage this is ill advised. Efforts should be made to preserve farming land in order to be more self-sufficient.

①

The new Local Plan allocated 259 homes to be build on ^{SHA}HA8. The original plan allocated just 174 homes for this land. The council have offered no reasoning for such a significant increase in housing or how this would logistically fit. The plot is on a rural road which is struggling to carry the

①

weight of traffic currently using it. Accident figures (with particular reference to the junction at Higher Lane/Mill Lane neighbouring the plot) reveal the danger that the road currently possesses. However, the influx of such a large estate has the capacity to bring 1000+ extra vehicles to these lanes. It would cause higher levels of carbon emissions and toxicity putting health care at risk. This, alongside the issues regarding the potential for an increase in traffic accidents, would deem the area unsafe and put residents at significant risk.

①

As it stands, if the plan is not significantly modified it will not be legally sound and should, therefore, not be allowed to go ahead. The evidence does not support the current plan and certainly does not support the need for loss of Green Belt land. The council should be reducing the housing and employment targets and allocating more previously developed land. If they were to do this, these precious Green Belt areas could remain protected.

We urge you to take into account our representation and its contents.

Yours faithfully,

J. A Hunt

Mr John Hunt
83 Rookery Lane
Rainford
St. Helens
Merseyside
WA11 8BL

E Hunt

Mrs Elaine Hunt
83 Rookery Lane
Rainford
St. Helens
Merseyside
WA11 8BL

T J Hunt

Mr Thomas Hunt



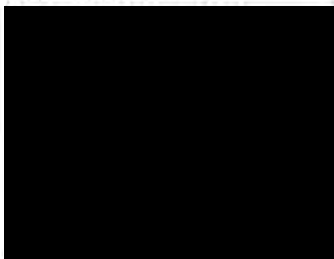
E J Hunt

Mr Ethan Hunt



O J Hunt

Mr Owen Hunt



PO0294

E10134



Representation on the local plan submission draft
Kirstie Hoyle
to:
planningpolicy
12/03/2019 21:44

Sinc SH4

① - LAOK

② - PRX 1.7.2

③ - S.A

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St.Helens.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St.Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site ^{SH4}HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So St.Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

①

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

]①

Yours faithfully

Mrs Kirstie Hoyle
[174 Higher Lane](#)
[Rainford](#)
St. Helens
WA11 8BH

Sent from my iPad

PO0295



St Helens Borough Local Plan 2020-2035 (Submission Draft)
Jeremy Calderbank to: planningpolicy

12/03/2019 21:51

Dear sir/ madam

I am sending this email as a resident of Rainford [REDACTED] In connection with the proposed release of Greenbelt land namely (HA8 Rookery Lane). I would like to make my thoughts known to you as to why I would judge the proposals as being totally inappropriate for Rainford and for the borough. I would ask you to consider my points below.

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I trust that the correct and logical decision can be made and the above land to be spared any form of development and be preserved as greenbelt, allowing the valuable attributes of the land to be utilised by continuing to farm and produce crops in a sustainable manner, preserving jobs and contributing to the local economy,

Kindest regards

Jeremy Calderbank
 91 Rookery Drive
 Rainford
 St Helens
 WA118BA

PO0296

ELO136

Site SHa



Rainford HA8 objection
Jo Meredith
to:
planningpolicy@sthelens.gov.uk
12/03/2019 22:10

① - LPAOS

② - PARA 1.7.2

③ - S.A.

My full name and address:-

Joanne Michelle Meredith
19 Mossborough Road
Rainford
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith
19 Mossborough Road
Rainford
WA11 8QN

Dear St Helens Council,

We are writing to object to your plans to build on grade one agricultural land.

Here are our reasons concerning the overall plan:-

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

①

②

Here are some Rainford Specific points (HA8 Rookery Lane) regarding our objection:-

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated

③

for housing in Phase 1

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

①

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

PO0297

ELO136

Site SHa



Rainford HA8 objection
Jo Meredith
to:
planningpolicy@sthelens.gov.uk
12/03/2019 22:10

① - LPAOS

② - PARA 1.7.2

③ - S.A.

My full name and address:-

Joanne Michelle Meredith
19 Mossborough Road
Rainford
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith
19 Mossborough Road
Rainford
WA11 8QN

Dear St Helens Council,

We are writing to object to your plans to build on grade one agricultural land.

Here are our reasons concerning the overall plan:-

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

①

②

Here are some Rainford Specific points (HA8 Rookery Lane) regarding our objection:-

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated

③

for housing in Phase 1

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

PO0298

Sinc 8HA

E60140



Revised Local Plan representations

to:

planningpolicy

12/03/2019 22:41

① - LPAOK

② - PARA 1.7.2

③ - S.A.

Dear Sir , please accept this email as our comments on the revised St Helens Local Plan.

Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So it is very reasonable to conclude that SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1 and should have been removed.] ③

As far as we are aware the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.] ②

We are unaware of exceptional circumstances to justify not using the standard method to calculate housing need, therefore there are no exceptional circumstances to change Green belt boundaries]

All available brownfield land , contaminated land and previously developed land should be used before any grade 1 agricultural land is used for housing.....this should be a national requirement. ①

We understand that there has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. The Council should be required to undertake such a consultation and publish the response.

The loss of Dial House wood adjacent to HA8 is unacceptable. The Council's statement that this is mitigated for is not accepted. Rainford has very little mature woodland and the removal of this wood is detrimental to the wildlife which need such woodland for survival.]

Yours faithfully

Nigel and Helen Powell

13 Mossborough Road

Rainford

WA11 8QN

PO0299

ELO142



Objection to Rainford Local Plan

jacqui ashton

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:50

Hide Details



SITE 8HA

① - LPA05

② - GENERAL

③ - S.A.

> ④ - DEC PARA 1.7.2

⑤ - LPA02

1 Attachment



REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD.docx

See attached Representation.

Sincerely Jacqui Ashton

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

SUGGESTED
AMENDMENTS

In respect of Rookery Lane, where I live, specific points apply:-

Specific points in re HA8 (Rookery Lane)

• Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

③

• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.

• The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

①

• There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Sincerely

Jacqui Ashton

Concerned householder

PO0300



Representation on the Local Plan Submission Draft
Lindsay Mellors

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:15

Hide Details

From: Lindsay Mellors

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Smc 8HA

① LPA05

② PARA 1.7.2

③ S.A.

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St. Helens. ✓

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St. Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land. ✓

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So St. Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

③

①

effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

10

Yours faithfully

Mrs Lindsay Mellors
1 Springvale Reeds Brow
Rainford
St. Helens
WA11 8PB

Kind Regards

Lindsay Mellors

