

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO0001 - RO0100

SEPTEMBER 2020

300

To whom it may concern. I am a resident of Rainford and live at 2 Meadow View. Below are my reasons for rejecting the proposed building plan for Rainford 2020 - 2035.

- 1. Using prime agricultural land. After Brexit, when the uk has to produce more of our own food vegetables and corn land used for building will be unavailable.
- 2. Changing the use of the land from agriculture to housing will take away the 'living' of agricultural workers, without bringing in any other form of employment.
- 3. The area is surrounded by quite narrow country lanes, Higher Lane being the main route between Rainford, Billinge and Wigan. There is only enough room for traffic to flow in single file in both direction with very few safe 'overtaking places'. Where will the entry/exit from the housing area be placed? There are a number of bends along the road that would hide emerging traffic from view until the last moment.
- 4. The pavements alongside those are very narrow in places and non-existent in others. It is already unsafe to walk along there at busy times and after dark. At the moment, in some stretches of the road as the pavement is too narrow to place it there.
- 5. If the road is widened, it will mean demolishing an old historic stone wall on both sides of the road and, in some points, encroaching on the precious copses and woodlands, thus further decreasing the ares of habitat for much of the wildlife.
- 6. Mill Lane is already much-used by heavy industrial traffic from the Industrial Estate off Sandwash Close. Large holes frequently appear without much warning and these are very deep and wide under the surface of the road. It is unsuitable for any more traffic.
- 7. Any increase in the amount of vehicles leaving or returning to the village will further 'clog up' an already constant stream of traffic in and out of the village at certain times ie, in the mornings from 7.30 9.30 am; and in the evenings from 4.30 6.00 pm.

 Mill Lane is often used like a race-track which is only moderately slowed down by the 'traffic-calming' system in place. This is often made worse by car owners parking their cars in the south-bound lane (which is where the cars heading towards the By-pass should be able to pause whilst waiting for the cards heading for Higher Lane to go past).

At the by-pass, the cars will be filtering into an already long stream of traffic heading out of Rainford towards the East Lancashire Road.

Rainford towards the East Lar	ncashire Road.
8. Lack of recreation ground	for children.
accessible to where the propos	are the nearest recreation land/playground sed new houses will be. (About 1 mile away.)
Yours sincerely,	
Karen Abbott	





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

Ref: LPSD

0 6 MAR 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

we will contact you by your postal address.

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:
	First name:
Last Name: ABBOTT	Last Name:
	Organisation/company:
Address: 2 MEADOW VIEW, OFF MILL LANE, RAINFORD	Address:
Postcode: WAII &AA	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 4/3/2019
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred mo	ethod of communication. If no email address is provided.

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)

1.

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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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.

Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	/	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)			
	consider the St Helen ead the Guidance note			nd the Te	ests of Soundness
Legally Co	mpliant?		Yes No		
Sound?	* 5 m. T.	П	Yes No		
	vith the Duty to Cooper	rate \square	Yes No		
Please tick	as appropriate				
	repared? with National Policy? give details of why yo	u consider the La	cal Plan is not legally	v compli	iant or is unsound
or fails t	so comply with the du ish to support the leg box to set out your c	ty to cooperate. <u>F</u> al compliance or	lease be as precise a	as possi	ble.
See	e attach.	el con	rments		

incapable of modification at examination)	onsider necessary to make the Local Plan legally matter you have identified at 6. above where this t any non-compliance with the duty to cooperate is . You will need to say why this modification will make . It will be helpful if you are able to put forward your or text. Please be as precise as possible.
	Please continue on a separate sheet if necessary
nd issues he/she identifies for examination.	cation; do you consider it necessary to participate at rings in public)
No, I do not wish to participate	Yes, I wish to participate at the oral
at the oral examination	examination
at the oral examination	of the examination, please outline why you consider
9. If you wish to participate at the oral part of	
9. If you wish to participate at the oral part of	
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9. If you wish to participate at the oral part of	

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

Please keep a copy for future reference.

1800756M

TO WHOM IT MAY CONCERN



- · I am a resident of Rainford and live at 2 Meadow View.
- Below are my concerns regarding St Helens local Plan for Rainford and the roads around the development site
- Higher Lane, Mill lane Rookery Lane, Pasture Lane
- The increased traffic on these roads will make the listed safety concerns worse
- Pavements in the area of the proposed development are not safe for pedestrians
- They are dangerously narrow in places and only on one side of the road with poor kerb stones in places
- Some bus stops are located in the farmers hedges with no safe place for bus passengers to stand
- Trees and bushes protrude onto the pavements and roads in places so pedestrians have to step into the road
- The pavements are not suitable for people on scooters
- · The pavements are not safe for families out with their children for a walk
- There are no safe pedestrian crossings in the area
- The traffic on Higher Lane can be very heavy in the morning and evening and very fast moving

Yours sincerely

David Abbott





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

Ref: LPSD

0 6 MAR 2019

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	Title:
	First name:
The state of the s	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Measow VIEW	Address:
ST HELRYS	
Postcode: WAII 8 A A	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 04-07-2019
Please be aware that anonymous forms ca considered you MUST include your details	annot be accepted and that in order for your comments to be above.
	ture stages of the St Helens Borough Local Plan 2020-2035? nation, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's prefer we will contact you by your postal address	rred method of communication. If no email address is provided,

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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 Pla	an does this repre	sentation relate?		
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	V	Habitats Regulations Assessment
	uments (please name and relevant part/secti	on)			
	consider the St Helen ead the Guidance note			nd the Te	ests of Soundness
Legally Co	mpliant?		Yes No		
Sound?			Yes No		
Complies v	with the Duty to Cooper	rate	Yes No		
Please tick	as appropriate				
Positively P Justified? Effective?	ead the Guidance note Prepared? with National Policy?				
or fails t	give details of why yo to comply with the du ish to support the leg box to set out your c	ty to cooperate. <u>F</u> al compliance or	lease be as precise a	s possi	ble.
	See attache	d comme	nts		

Suç		d. It will be helpful if you are able to put forward your or text. Please be as precise as possible.
000		Please continue on a separate sheet if necess succinctly all the information, evidence and supporting
	his stage, further submissions will be o sues he/she identifies for examination.	
l iss	our representation is seeking a modification or all part of the examination? (the heat	cation; do you consider it necessary to participate a arings in public)
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If y	our representation is seeking a modifice oral part of the examination? (the heat No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If y	our representation is seeking a modifice oral part of the examination? (the heat No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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If y	our representation is seeking a modifice oral part of the examination? (the heat No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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

Ref: LPSD

3 MAR 2019

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address is provided, we will contact you by your postal address.

1. Your Details	Your Agent's Details (if applicable (we will correspond via your agent)
Title: VR	Title:
First Name: ALAN Last Name: ABBOTT	First name:
Last Name: ABBOTT	Last Name:
Organisation/company: A	ABBOTT Organisation/company:
Address: FIR TREE WINGS MOSS, GENERAL ST. HELENS	FARM Address:
Postcode: WAII 84	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 9-3-19
	s forms cannot be accepted and that in order for your MUST include your details above.
Plan 2020-2035? (namely sub Inspector's recommendations	odated of future stages of the St Helens Borough Local omission of the Plan for examination, publication of the and adoption of the Plan)
Yes 🗸 (Via Email)	No 🗌

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	ments (please nam and relevant n)	A	th Polic	にころ
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Sound?		Yes □	No ☑	
	ith the Duty to	Yes □	No 🗹	
Cooperate				
Please tick as	s appropriate			
	nsider the Local Pla the Guidance note for		because it is not: ne Tests of Soundness	
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ase note your representation should cover succinctly all the information, evidence and aporting information necessary to support / justify the representation and suggested diffication, as there will not normally be a subsequent opportunity to make further resentations based on the original representation at the publication stage. For this stage, further submissions will be only at the request of the Inspector, base matters and issues he/she identifies for examination. If your representation is seeking a modification; do you consider it necessary to participate oral part of the examination? (the hearings in public) No, I do not wish to participate at the oral examination. If you wish to participate at the oral part of the examination, please outline why you consider the oral examination.	ites to soundness (NB please note that any no apable of modification at examination). You will Local Plan legally compliant or sound. It will be gested revised wording of any policy or text. P	I need to say why this modification will make helpful if you are able to put forward your
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Representation (i.e. Comment) Form

St Helens Borough Local Plan 2020-2035 (Submission Draft)

Ref: LPSD

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Last Name: ABBOTT	Last Name:
Organisation/company:	Organisation/company:
Address: FIR TREE FARM PIMBO ROAD. WINGS MOSS Postcode: LENS WALL &RG.	Address: Postcode:
rostode.	Tel No:
	Mobile No:
	Email:
lease be aware that anonymous forms cann	그렇지 않는 것이 그렇게 하면 사람들이 하면 가지 않는데 하면 하는데 하면 하는데
omments to be considered you MUST include	de your details above.
Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	n of the Plan)
Yes (Via Email)	No 🔲
Please note - e-mail is the Council's prefer address is provided, we will contact you by	red method of communication. If no e-mail vour postal address.

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Policy	h part of the Local Pl Paragraph	Policies	Sustainability	Habitats
	/ diagram / table	Мар	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
Other docu	uments (please name		Assessment	4
	and relevant			
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	consider the St Heler			
			egal Compliance and the	Tests of Soundness
Legally Co	mpliant?	Yes 🗆	No 🗆	
Sound?	W. H. D. L. L.	Yes 🗆	No 🗹	
	with the Duty to	Yes 🗆	No 🗆	
Cooperate	s appropriate			
r lease tick a	s appropriate			
5. If you co	onsider the Local Pla	n is unsound, is it	because it is not:	
	the Guidance note for			
Positively I	Prepared?			
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Please set out what modification(s) you consider the compliant or sound, having regard to the matter you	ou have identified at 6. above where this
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he Local Plan legally compliant or sound. It will be uggested revised wording of any policy or text. P	
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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



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).

2105 YAM E 1

PART A - YOUR DETAILS

address is provided, we will contact you by your postal address.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: Paul	First name:
Last Name: ADAMS.	Last Name:
Organisation/company:	Organisation/company:
Address: 15 NEW BOLD COURT	Address:
ST. HELENS	
Postcode: WA9 HTE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 26 4/19.
lease be aware that anonymous forms cannot omments to be considered you MUST include you	be accepted and that in order for your your details above.
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of	e stages of the St Helens Borough Local Plan for examination, publication of the the Plan)
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the R	e stages of the St Helens Borough Local Plan for examination, publication of the the Plan) No

Representor Details

Web Reference Number	WF0227	
Type of Submission	Web submission	
Full Name	Mrs Kathryn Adamson	
Organisation	The state of the s	
Address	5 Regal Drive	
	Windle St Helens	
	WA10 6BJ	
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	LI AUS EF AUG
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.

8HS is not a sustainable part of land on which to build over 1000 houses. It is adjacent to the A580 which is main route for traffic from liverpool super port to the M6 This area is noisy and polluted. 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. Windle Brook runs through the site and this lies on a flood plain.

The local road networks, health service, schools policing, public transport cannot support the proposed massive expansion of housing. The plan is not effective. The local plan submission draft is based on flawed employment forecasts and cannot be supported by historical facts.

8HS should be maintained as green belt for the above reasons

7. Please set out modification(s) you consider are necessary Retain all green belt areas for the future of our communities redevelop 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	3/11/2019 10:42:59 AM	



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

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: r√k	Title:
First Name: GRANAM	First name:
Last Name:	Last Name:
Organisation/company: BOLD ACTION GROWP	Organisation/company:
Address: 64 EVERGREEN WAY	Address:
Postcode: VA9425 Tel No:	Postcode: Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: GTH MARCH 19

	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the d 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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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 <u>PART B</u> of this form, setting out your representation/comment.



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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:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 64 EVORGREGOD WAY	Address:
Postcode: WA9 425	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 9TH 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 stage Plan 2020-2035? (namely submission of the Plan for Inspector's recommendations and adoption of the F	or examination, publication of the
Yes (Via Email) No	
Please note - e-mail is the Council's preferred meth address is provided, we will contact you by your pos	od of communication. If no e-mail stal address.

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



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004 13 MAY 2019

PART A - YOUR DETAILS

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

Your Agent's Details (if applicable) (we will correspond via your agent)	
Title:	
First name:	
Last Name:	
Organisation/company:	
Address:	
Postcode:	
Tel No:	
Mobile No:	
Email:	

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 Plan 2020-2035? (namely submission Inspector's recommendations and a	d of future stages of the St Helens Borough Local on of the Plan for examination, publication of the idoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. If no e-mail you by your postal address.

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

157 13 MAY 2019

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: NICOLA	First name:
Last Name: Addrson	Last Name:
Organisation/company:	Organisation/company:
Address: 44 GORSEM LANE	Address:
Postcode: WARLYXB	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 16 RPRU 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 Plan 2020-2035? (namely submission Inspector's recommendations and accommendation of the commendation of the com	on of the Plan for examination, publication of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	preferred method of communication. If no e-mail you by your postal address.





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1 3 MAR 2019

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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	Your Agent's Details (if applicable (we will correspond via your agent)	
Title: Mrs	Title:	
First Name MARCARET	First name:	
Last Name: AINSCOUGH.	Last Name:	
Organisation/company:	Organisation/company:	
Address: 13, ECCIES ROAD. KITT GREEN, WIGAN	Address:	
Postcode: WNS QUR.	Postcode:	
Tel No:	Tel No:	
Mobile No:	Mobile No:	
Email:	Email:	

Signature:	Date:	12/3/19.	

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 fur Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Council's prefer address is provided, we will contact you by	red method of communication. If no e-mail your postal address.

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Local Plan

St. Helens Council

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or by hand delivery to:

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Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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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 <u>PART B</u> 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.

Policy	part of the Local F	Policies	Sustainability	Habitats
rolley	/ diagram / table	Map	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
	uments (please nam and relevant n)	ne		
Please read	d the Guidance note f	ens Borough Loca for explanations of L	Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Co	mpliant?	Yes 🗆	No 🗆	
Sound?		Yes	No 🗵	•
Complies of Cooperate	with the Duty to	Yes □	No 🗵] ✓
5. If you co	s appropriate onsider the Local Pl			
		for explanations of the	he Tests of Soundness	
Justified?	Prepared?			
Effective?		X		
	t with National Polic	-		
or fails to o	comply with the duty	y to cooperate. Ple	ocal Plan is <u>not legally or</u> ease be as precise as po oundness of the Local P	ossible.
Green Belt, The Submis National Pla a) Positively b) Justified - would erode c) Effective -	is more vulnerable to de sion Draft, in some polic nning Policy Framework prepared – In fact too per jobs and housing num e 'exceptional circumsta the policies would be	evelopment without the cy areas, fails to meet k (February 2019) (NF positive, leading to over abers are over estimate nces; more effective if the s	e protection of an up to date, the tests of soundness as se PPF): er-planning for jobs and hous ed and more brownfield reus ite allocations were based or es that conflict with the NPPF	et out in paragraph 35 of the sing. e is possible, these combine a a brownfield preference.

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.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

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Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

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It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

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Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

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Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling. Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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 the oral part of the examination? (the hearings in the oral part of the examination?)	
No, I do not wish to participate at the oral examination	

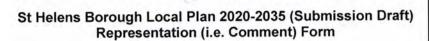
9. If you wish to participate at the oral	part of the examination,	please outline why you co	nsider
this to be necessary:			

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.





Ref: LPSD

1 3 MAR 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 <u>5pm on Wednesday 13th March</u> 2019. Any comments received after this deadline <u>cannot</u> 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: M2	Title:	
First Name CARY	First name:	
Last Name: AINSCOUGH.	Last Name:	
Organisation/company:	Organisation/company:	
Address: 13, Eccles ROAD,	Address:	
KITT GREEN, WIGAN		
Postcode: WMS OHR.	Postcode:	
	Tel No:	
Mobile No:	Mobile No:	
Email:	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 upda Plan 2020-2035? (namely submi Inspector's recommendations and	sted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Councilable address is provided, we will contain	cil's preferred method of communication. If no e-mail act you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

WA10 1HP

St. Helens Council

Town Hall Victoria Square St.Helens Merseyside

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 <u>PART B</u> 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.

Policy	part of the Local F Paragraph	Policies	Sustainability	Habitats	
rolley	/ diagram / table	Map	Appraisal/ Strategic Environmental Assessment	Regulation Assessment	
	uments (please nam and relevant n)	ne			
4. Do you	consider the St Hele	ens Borough Loca	l Plan 2020-2035 is: egal Compliance and the	Tests of Soundness	
Legally Co		Yes	No C	Toolo of Countries	
Sound?	inpliant:	Yes 🗆	No 🗵	1 ✓	
		Yes 🗆		No ⊠ ✓ No ⊠ ✓	
	is appropriate				
Positively Justified? Effective? Consistent	t with National Polic	y? 🛛			
or fails to	comply with the duty	y to cooperate. Ple	ocal Plan is <u>not legally c</u> ease be as precise as po	ossible.	
box to set	out your comments			lan, please also use this	
The Submis National Pla a) Positively b) Justified - would erode c) Effective	sion Draft, in some policening Policy Framework prepared – In fact too persons and housing number exceptional circumsta	cy areas, fails to meet k (February 2019) (NF positive, leading to ov- bers are over estimat nces:	e protection of an up to date the tests of soundness as seper): er-planning for jobs and housed and more brownfield reus ite allocations were based or	et out in paragraph 35 of the sing. e is possible, these combine	

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.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

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8. If your representation is seeking a modification the oral part of the examination? (the hearings in	
No, I do not 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

1 3 MAR 2019

(For official use only)

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PART A - YOUR DETAILS

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Title: M@	Title:	
First Name CRAIG	First name:	
Last Name: AINSCOUGH.	Last Name:	
Organisation/company:	Organisation/company:	
Address: 23, Pracfield ST WICAN	Address:	
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Signature: Date: 01/3/19.		
Please be aware that anonymous forms cannot b comments to be considered you MUST include yo		
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Please note - e-mail is the Council's preferred raddress is provided, we will contact you by you		

RETURN DETAILS

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

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01744 676190

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The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St.Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land.

There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling. Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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 the oral part of the examination? (the hearings in	n; do you consider it necessary to participate at public)
No, I do not 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.



Representations on the revised St Helens Plan Lisa Ainsworth to:

planningpolicy 11/03/2019 06:11

Dear Sir/madam

I wish the following comments to be passed on to the inspector relating to the revised St Helens plan.

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

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.

Kind regards Mrs Lisa Ainsworth 53 Pilkington st (2

Rainford St. Helens Merseyside Wall8hg

Representor Details

Web Reference Number	WF0048
Type of Submission	Web submission
Full Name	Mrs Pauline Ainsworth
Organisation	
Address	135 Victoria Road
	Garswood
	WN4 0UH
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?

or to trinon part or the lotter rain about the representation related	
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?	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.

The population of St Helens has been in decline over the last 30 years, therefore it is not justified to build this large area of housing using greenbelt land.

The Council and building companies should be encourages to use derelict and other urban land rather than choosing the easier option of greenbelt land.

Further housing in this area is not sustainable. We have a lack of school places, public transport services and doctors surgeries are already overstretched.

The added daily number of cars generated by this housing proposal will seriously impact on the safety and well-being of our community. The country roads of Garswood/Billinge are totally inadequate to deal with an increase of traffic that this development will generate.

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	3/13/2019 3:44:00 PM
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 3 MAR 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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name STUART	First name:
Last Name: ALDRIDGE	Last Name:
Organisation/company:	Organisation/company:
Address: 6376 ASTAWG ROAD, PRESTON Postcode: PR3 5DQ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 08/03/19

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.

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Yes 🛛 (Via Email)	No 🗌
	ncil's preferred method of communication. If no e-mail tact you by your postal address.

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St. Helens Council

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I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St.Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date — along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land.

There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling. Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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

our representation is seeking a modification and part of the examination? (the hearings	on, do you consider it necessary to participate at in public)
No , I do not 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.

RO0018

Save Rainhull Campaign clo Sh. Helex Town Hall (Br onward transmission) Crownik / planning-building control) Dear Sir,

Re Save Rainfull from hihre developments

Habrierd Crarles Village , Ecceston Park Croll Course

and owing a property in Stilled and living in close proximity to Whiston Mospital or ready lity-year, I feel, along will my family appalled at the prospect of taking advantage of using more 'Creen Bell'

and although I like to think I am bound thinking, this latest prospect of the Madsnead Grande Village Estate and the development of the Eccleston Park Golf Course tills me, my family, threads a reighbours with Loror.

I think to be brel I will list below my feelings: -

Ar nature is holy unacceptable; and the derise of much environment the discuss of holy unacceptable; and the discuss of the green half and built on by Anchor Mome or baking over more of the green half for both resides and nature to enjoy. Added to this, the bottom where I am situated there was a large hald enjoyed by wattern, children young men playing bottoull, (No Knile Crime Then) all this has long gone, and what have we been left will - a cul-de-sac where its almost impossible to pate or indeed him one car around. I am at an age where I will not see the decimation and dange this will have, but I am concerned about what we leave the next generator.

2) As far as the extra trathe and pollution are concerned it would be totally unacceptable. Here roads were only made originally be light trathe or indeed "horse a courts" At the bottom of the road we have hiverpool to the right direction

Conhaued: -

Ro: Save Ranhell Campaign - 2 -Widnes | Wannaghen - M62 to Me Iell, and the Leavy brather now is imnerse, along with the constant 10 110A Bus Service . Ambulances.

Whishon Hospital, Warnington Road Rambell is at
the bottom of the road, and
A & E' now will a 7 hour waiting home,
which I understand, but how much more pressure
will this have on the aven will more resident making
use of our G.P. Suggnes etc etc.

Someone, somewhere should be thinking about

the residents living here now

development is due to the Railway system to 3 stations in the vicinity to Rainholf, Thathoppent, Ecotober Park with the suggestion that a Park a Ride parking facility be located along side, or near the Willow brook thospice in Portico have, Shitteless just how insensitive and thoughtless the plan is one cannot imagine.

I personally feel the pollution, chases a may how these developments will create will come home to roost " and someone or indeed those in authority should have some regard to the people that live in Rainhill now a have done so to- many years

Some call this progress - not is my book - that you be listering a please consider very deeply this senous matter

Your L. W.C.l.

RO0019



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)

1 3 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: NRS.	Title:
	First name:
Last Name: AUDUSON	Last Name:
	Organisation/company:
	Address:
ST. HEVENS	
Postcode: WAG 4SY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	nail:
Signature:	Date: 11-3.10

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 - 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.

RO0020



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

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title
	Title:
	First name:
Last Name: AUNSON	Last Name:
	Organisation/company:
Address: 47 NGLLS ROAD	Address:
800	
STHELENS	
Postcode: WAS 454	Postcode:
	_ Tel No:
Mobile No:	Mobile No:
Emai	ail:
Signature:	Date: 11. 3.19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, p adoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's preferred met	thod of communication. If no email address is provided,

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RO0021



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

Ref: LPSD

- 1 MAR 2018

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we will contact you by your postal address.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

0 1 MAR 2019

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: ALVCOCK	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 21-2-2019
Please be aware that anonymous forms cannot be a	
considered you MUST include your details above.	
Nould you like to be kept updated of future stage namely submission of the Plan for examination, pubadoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? plication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

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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.

Policy -PA 06 HS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmenta Assessment	Regulations Assessment
	ments (please name and relevant part/secti	on)		
	consider the St Helen and the Guidance note			and the Tests of Soundnes
Legally Cor	mpliant?		Yes	No
Legally Cor Sound?	mpliant?	_	Yes □ M	
Sound?	mpliant? with the Duty to Coope			No
Sound? Complies w			Yes 🔽	No
Sound? Complies w Please tick 5. If you co	with the Duty to Coope	rate	Yes Yes Yes because it is not:	No
Sound? Complies w Please tick 5. If you co	vith the Duty to Cooper as appropriate ensider the Local Plan and the Guidance note	rate	Yes Yes Yes because it is not:	No
Sound? Complies w Please tick 5. If you co	vith the Duty to Cooper as appropriate ensider the Local Plan and the Guidance note	rate n is unsound, is it for explanations of	Yes Yes Yes because it is not:	No
Sound? Complies w Please tick 5. If you co Please re Positively P	vith the Duty to Cooper as appropriate ensider the Local Plan and the Guidance note	rate n is unsound, is it for explanations of	Yes Yes Yes because it is not:	No

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

Not justified - the council should be put to strict proof of its population restimates. The population of st. Helens has been in deckine since 1981. Where are all the extra people coming from. One of the purposes of the Gruenbett is to assist in urban regeneration by encouraging the re-cycling of develocition and other urban land. Using 'Greenbett' fails to encourage this the rebase of Greenbett' with cause significant ham to the purposes of the Greenbett' thousing in this area isn't sustainable because of the lack of school places, doctors surgeries bus routes and other sorries. The use of cap is being encouraged because of lack of facilities.

compliant or sound, having regard to the marelates to soundness (NB please note that incapable of modification at examination). the Local Plan legally compliant or sound.	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your
suggested revised wording of any policy of	r text. Please be as precise as possible.
	Please continue on a separate sheet if necessa
ormation necessary to support/justify the repres	sentation and suggested modification, as there make further representations based on the original
er this stage, further submissions will be on	nly at the request of the Inspector, based on matters
ter this stage, further submissions will be on d issues he/she identifies for examination.	ation; do you consider it necessary to participate at
ter this stage, further submissions will be on d issues he/she identifies for examination. . If your representation is seeking a modifica	ation; do you consider it necessary to participate at
ter this stage, further submissions will be one dissues he/she identifies for examination. If your representation is seeking a modification the oral part of the examination? (the hearing No, I do not wish to participate	ation; do you consider it necessary to participate at ngs in public) Yes, I wish to participate at the oral
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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.

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RO0022



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

Ref: LPSD

- 1 MAR 2018

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1. Your Details

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.

view at http://www.legislation.gov.uk/ukpga/2004/5/contents

0 1 MAR 2019

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company;
ASHTON-IN-MAKERFIELD	Address:
Postcode: WN4 OXJ	Postcode:
Tel No:	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 27-2-2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred met we will contact you by your postal address.	thod of communication. If no email address is provided,

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post to: Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

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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	h part of the Local Pla	n does this repre	sentation relate?	
Policy LPA 06	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/sectio	n)		
	consider the St Helens ead the Guidance note f		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Co	mpliant?	\checkmark	Yes No	
Sound?			Yes No	
Complies	with the Duty to Coopera	ate	Yes No	
Please tick	as appropriate			
	onsider the Local Plan ead the Guidance note f		because it is not: f the Tests of Soundness	
Positively F	Prepared?	Ø		
Justified?				
Effective?				
Consistent	with National Policy?	V		
or fails t If you wi use this	to comply with the duty ish to support the lega box to set out your co	y to cooperate. P I compliance or s mments.	cal Plan is not legally con lease be as precise as po soundness of the Local F	ossible. Plan, please also
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Thank you for taking the time to complete and return this response form.

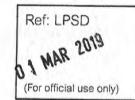
Please keep a copy for future reference.

RO0023



(1)-LPAOS PROIS9 (2)-LPAOS 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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name:	First name:
Last Name: ALLCOCK	Last Name:
Organisation/company:	Organisation/company:
Address: 1 CANNOS NOS	Address:
Postcode: WAII OBU	
	Tel No:
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ould you like to be kept updated of future	stages of the St Helens Borough Local Plan 2020-2035? In, publication of the Inspector's recommendations and
Yes (via email)	□ No
lease note - email is the Council's preferred e will contact you by your postal address.	method of communication. If no email address is provided,

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

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.

Policy LPA-55	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic	Habitats Regulations
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	e details of why you	consider the Loca	al Plan is not legally com ase be as precise as pos	pliant or is unsound

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 PROPOSED REMOVAL FROM
THE GREEN BELT

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)

10

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.

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.

Policy Paragraph/ diagram table Other documents (please name document and relevant part/section) 4. Do you consider the St Helens Borough Local Plan Please read the Guidance note for explanations of Leg Legally Compliant? Legally Compliant? Sound? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it bec Please read the Guidance note for explanations of the Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local F or fails to comply with the duty to cooperate. Pleas If you wish to support the legal compliance or sound	I Compliance and No No No No No	DONT KNOW
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DELETE THIS LAND FROM PROPOSED REMOVAL FROM GREEN BELT

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at the oral examination

RO0024

1 2 MAR 2019

PFOS5



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 A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
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Last Name: ALLEN	Last Name:
Organisation/company:	Organisation/company:
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	el No:
	/lobile No:
Signature:	Date: 5 March 2019
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ould you like to be kept updated of future	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	□ No
lease note - email is the Council's preferred re will contact you by your postal address.	method of communication. If no email address is provided,

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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.

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

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3. To which	part of the Local Pla	an does this represe	entation relate?	Line Wilderiger Desired	i de
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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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.

Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)		
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 10 hai ---

(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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: WILLIAM	First name:
Last Name: ALLEN	Last Name:
Organisation/company:	Organisation/company:
Bolb.	Address:
Postcode: WA9 45 Y	Postcode:
	Tel No:
	Mobile No:
Signature:	Date: 12 March 2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me	thod of communication. If no email address is provided,

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

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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.

	E = 1	n does this repre	esentation relate?	
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/sectio	n)		
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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 incapable of modification at examination). You will need to say why this modification will refer the Local Plan legally compliant or sound. It will be helpful if you are able to put forward youngested revised wording of any policy or text. Please be as precise as possible.	is nake
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indicated that they wish to participate at the oral part of the examination

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

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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1. Your Details

13 MAY 2019

2. Your Agent's Details (if applicable)

(we will correspond via your agent)

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

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First Name: M DAKYL	First name:
First Name: MDAKYL Last Name: ALLEN	Last Name:
Organisation/company:	Organisation/company:
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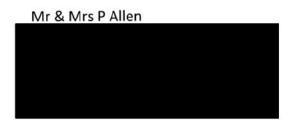
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Title: MRS	Title:
First Name: Angela	First name:
Last Name: Aנגנית	Last Name:
Organisation/company:	Organisation/company:
Address: 74 THE ASTURES	Address:
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	Tel No:
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Signature:	Date: 17/4/19

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Would you like to be kept upon Plan 2020-2035? (namely subn Inspector's recommendations a	lated of future stages of the St Helens Borough Local nission of the Plan for examination, publication of the nd adoption of the Plan)
Yes (Via Email)	No 🗌
	ncil's preferred method of communication. If no e-mail tact you by your postal address.



21 February 2019



25 FEB 2019

FOR THE ATTENTION OF THE LOCAL PLAN OFFICER CONCERNING 8HS

Dear Sir/Madam

My wife and I are objecting most strongly, about the changing of the greenbelt land (8HS) to safeguarded land in our area.

The reason's we object to these plans are set out below:

- 1) We are living on a floodplain (that is what the insurance companies tell us when we try to renew are building insurance each year. More houses are only going to add to this problem).
- 2) Not enough amenities in the area (Doctor's, Dentist's, shops and school's).
- 3) Poor road net work (you can be sat in a queue of traffic on Rainford Road, wanting to turn into Bleak Hill Road a good 15 min and that is on a Monday morning at 10.30am because Windle Island is so congested).
- 4) Bus service in the Windle area is terrible (buses run every hour and finish early and the weekend service is unreliable).
- 5) Bleak Hill School (the school already had plan's in place to extend due to the number of children who live in this area and are refused a place. They are making 70 more places. The average class 32 children.

 and there were between 30 32 in a class. We do not have room for the children in Windle and Eccleston, let alone another 300 plus children.

The government have recently done surveys on high volumes of traffic and how it affects children suffering from asthma and it does contribute highly.

Can you imagine how much damage 1000

more cars would do?

We feel the decisions being taken by the council are haphazard and not heeding what the public want. Once the land is gone there is no turning back.

We want to keep 8HS as Greenbelt, not Safeguarded, as Safeguarded is not what it seems. The council could decide to build next year if it is changed to **Safeguarded.**

Please re-think this plan, let us have some greenery to look at and utilise the brown belt instead.

Yours Sincerely

Mr & Mrs Paul and Ann Allen.

25 FEB 2019



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Ref: LPSD

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Part B - Your Representation(s)

1 3 MAY 2019

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: ALLERTON	Last Name:
Organisation/company:	Organisation/company:
Address: 2 EASTHAM CRESCENT CLOCKFACE, ST. HELENS MERSEY SIDE	Address:
	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 7/5/19.

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 Monday 13th May 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

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	Title:
	First name:
Last Name: ALLENTON	Last Name:
	Organisation/company:
Address: 2, EASTUAM CRESCENT,	Address:
MENSEYSIDO.	
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Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
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	Last Name:
Organisation/company:	Organisation/company:
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Tel No:	Tel No:
	Mobile No:
	Email:
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Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
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Yes (via email)	× No

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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.



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)

PART A - YOUR DETAILS

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

1 3 MAY 2019

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title:
	First name:
	Last Name:
	Organisation/company:
	Address:
Postcode: WR9 467	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 7/5/2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	yes of the St Helens Borough Local Plan 2020-2035? Iblication of the Inspector's recommendations and
Yes (via email)	✓ No
Please note - email is the Council's preferred meth we will contact you by your postal address.	nod of communication. If no email address is provided,

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 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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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.

RO0033



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

1 3 MAY 2019 Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name:	First name:
Gillian	
Last Name:	Last Name:
HIMOIN	
Organisation/company:	Organisation/company:
Address: 73 CTO/SEY Lane Clock Face, ST Helens	Address:
Clock face, STHEIRAS	
Postcode: WAGUXA	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	
Signature:	Date: 23.3.19.

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.	

Representor Details

Web Reference Number	WF0208
Type of Submission	Web submission
Full Name	Miss Gillian Allman
Organisation	
Address	73 Gorsey Lane
	Clock Face
	St Helens WA9 4XA
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?

or to trinon part of the zood that does this topics	2011001011010101
Policy	Local plan 2020-2035 x
Paragraph / diagram / table	
Policies Map	x
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.

Please note supporting information from Clock Face & Bold Action Group. Please note I am in total agreement with all its contents

7. Please set out modification(s) you consider are necessary

Please note supporting information from Clock Face & Bold Action Group. Please note I am in total agreement with all its contents

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

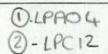
No, I do not wish to participate at the oral examination

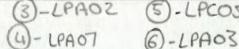
9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

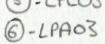
Response Date	3/11/2019 8:45:26 PM

RO0034









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 3 MAY 2019

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mc	Title:
First Name: David	First name:
Last Name: Almond	Last Name:
Organisation/company:	Organisation/company:
Address: 33 Mill brook Lane Eccleston, St. Helens, Merseyside Postcode: WAIO 4QX	Address: Postcode:
CONTRACTOR OF THE PROPERTY OF	el No:
	lobile No:
British Bulletine	mail:
Signature:	Pate: 11th May 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.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🗹 (Via Email)	No 🗌
Please note - e-mail is the Council address is provided, we will contact	's preferred method of communication. If no e-mail of 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

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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 <u>PART B</u> 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.

Policy /	are or end Look	I I Idii	TOGS THIS I	chiese	ntation relate?		· 大学的 · · · · · · · · · · · · · · · · · · ·	
	Paragraph / diagram / table	/	Policies Map	/	Sustainability Appraisal/ Strategic Environmental Assessment	/	Habitats Regulation Assessment	1
Other docume document and part/section)	ents (please na I relevant	ame	1					
					n 2020-2035 is: Compliance and t	he Test	s of Soundness	
Legally Compl		Ye			No	N/	No	
Sound?		Ye	s C			M	No	
Complies with Cooperate	the Duty to	Ye	es 🗆		No		No	
Please tick as ap	propriate			UA-WANTHUMINININININI				
Effective?			X/No					
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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.

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering. Wind turbine factories. Then if they come and need employees, the council would be able to justify the need for housing in the 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.

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.

RO0035



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

Ref: LPSD

2 8 FEB 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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mrs.	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 28, CARMELITE CRES ECCLESTON. PA. HELENS. MERSENSDE	Address:
Postcode: WAIO SEP.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 24/02/2019

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 V

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.

Policy	Paragraph	Policies	Sustainability	Habitats
	/ diagram / table	Мар	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
Other docu	ments (please nan	ne		
document a part/section	and relevant n)			
Please read	the Guidance note i		Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Cor	mpliant?	Yes 🗆	No ⊠	
Sound?		Yes	No 🗵	
Complies w	vith the Duty to	Yes 🗆	No 🗵	
Cooperate				
Please tick as	s appropriate			
	nsider the Local Pl		t because it is not: ne Tests of Soundness	
Please read	the Guidance note i	or explanations of th	ie resis di Souridress	
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Please note your representation should cover sur- upporting information necessary to support / just- nodification, as there will not normally be a subse- peresentations based on the original representations. If the this stage, further submissions will be on an matters and issues he/she identifies for example to the processor of the submissions. If your representation is eaching a modification.	rify the representation and suggested equent opportunity to make further ion at the publication stage. Inly at the request of the Inspector, based amination.
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	Yes, I wish to participate at the oral
No, I do not wish to participate at the oral examination	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.

RO0036



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 A - YOUR DETAILS

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: CHRISTINE	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 28 CARMELITE CRES., ECCLES TON, ST. HELENS MERSEYSIDE Postcode: WAID SLP	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	

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.

	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the d adoption of the Plan)
Yes (Via Email)	No M
Please note - e-mail is the Councaddress is provided, we will conta	il's preferred method of communication. If no e-mail act you by your postal address.

capable of modification at examination). You wi e Local Plan legally compliant or sound. It will b uggested revised wording of any policy or text. F	be helpful if you are able to put forward your
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

RO0037





(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

we will contact you by your postal address.

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Address: 207 LUER POOL R.D	Address:
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	Tel No:
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	stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and
Yes (via email)	□ No

Please note - email is the Council's preferred method of communication. If no email address is provided,

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

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FURTHER INFORMATION

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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.

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PÁRT B - YOUR REPRESENTATION

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RO0038



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

Ref: LPSD

0 5 MAR 2019

(For official use only)

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	First name:
	Last Name:
	Organisation/company:
	Address:
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Yes (via email)	□ No
Please note - email is the Council's preferred me	ethod of communication. If no email address is provided,

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Please keep a copy for future reference.

RO0039



Eccleston Parish Council Response to Local Plan Eccleston Parish Council

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 D-LPA06

2) - LPA04

3) - LPAOS

(4)-10P

S-LPAOS

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,

(L038)

consistent with national policy or positively prepared and as a consequence, it would surely follow that it is therefore unsound.

Policy specific response

LPA04 - A Strong and Sustainable Economy

We believe the economic growth scenario outlined in the LPSD is not achievable or sustainable.

St Helens Council's planning policies for the economy are extremely aspirational. These are based on data derived from the Oxford Economics Forecasts. These forecasts are themselves optimistic and contain a circular argument in that they are impacted upon by the input of supply side i.e. land allocations from St Helens Council planners. Assumptions that have not been tested at examination, namely the release of Green Belt land. This is not an objectively assessed need it is a weighted, self-fulfilling circular argument.

Modification:

The economic analysis is flawed and based on over-optimistic assumptions, which mean that 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. As such, St Helens Council should bring forward more realistic economic growth predictions that are line with neighbouring local authorities which in turn will have less impact on the environment, lead to less need for new infrastructure and protect Green Belt land from unnecessary development.

LPA05 - Meeting St. Helens Borough's Housing Needs

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The Housing Need assessment does not use Standard Methodology and therefore there is no case for "exceptional circumstances" for Green Belt land such as land at the Eccleston Park Golf Course (Site 3HS) to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Why, for instance, are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15-year plan. When making important decisions the best available data should be used and St Helens Council's decision to use this 2014 based data is fundamentally flawed.

The justification for the Greenbelt Review (2018) is an erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt, such as 8HS and 3HS for so-called "safeguarding". We do not consider an overambitious and aspirational housing target to be "exceptional circumstances" for the removal of Green Belt land and the 2016 ONS population projection figures should be applied.

Modification:

St Helens Council should adopt the most up-to-date ONS (2016) projection figures, which set a requirement for 383 new homes to be built per annum. This would remove the need for any Green Belt release during the Local Plan period 2020 – 2035, with development concentrated solely on previously developed brownfield sites, of which there are many across St Helens.

2



E.L. DU51

LPA06 - Safeguarded Land

The Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The Housing Need assessment does not use Standard Methodology (SM) and therefore there is no case for "exceptional circumstances" for Green Belt land such as land at 8HS and 3HS to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Table 4.8 of the Local Plan outlines the requirements for Safeguarded Land for Housing beyond 2035. It estimates that 3096 homes to be needed, if a development restriction at Eccleston Park Golf Club related to highway issues, is lifted requiring 148 ha of land, 97% of which is Green Belt, including 8HS and 3HS Eccleston Park Golf Club site contributing approximately two thirds of these homes and Green Belt Land in the Eccleston ward

In addition, the Local Plan proposes 2955 new homes in Bold from the Allocated Housing Need beyond 2035 (Table 4.5). This equates to 6 years housing supply beyond 2035 using the 486-pa housing need proposed in the Local Plan. If a housing need of 298 pa beyond 2035 is adopted from LPSD Table 4.7 then the Allocated housing supply period extends to just short of 10 years. As such both of these analyses show that the 5 Year Housing Supply is met without the need for safeguarding at all.

Moreover, para 4.24.4 of the LPSD also acknowledges that small/windfall sites will further influence housing need beyond 2035 as well as a reduction on the annual housing need mentioned above. For instance, applying the small /windfall sites allowance of 93 homes pa will add 558 homes over 6 years and 930 homes over 10 years housing supply discussed in the previous paragraph. A further 2-3 years of housing need on top of the 6-10 years from Allocated Housing need provision.

It is therefore clear that without the Safeguarded sites, there will be a buffer totalling between 8, or as appears more likely given the reduced housing need, 13 years of housing land supply, more than enough to satisfy the 5 Year Housing Land Supply requirements. Put another way, between 53 and 87% of a 15-year plan period.

Modification:

The above demonstrates the safeguarding provisions in the LPSD are extraordinarily excessive and completely unnecessary. As such, safeguarding should be withdrawn completely from the LPSD proposals with all safeguarded Green Belt sites retained within their current Green Belt boundaries.

LPA08 - Infrastructure Delivery and Funding

A major concern that we have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it.

The IDP highlights quite well the projects currently underway in the Borough to try to alleviate the problems of today, however seems to lack any substance on what will be done to solve the issues of the future. The Local plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, on the A580 and at Windle Island (8HS) and on Portico Lane and Rainhill Road that surround 3HS (for example, a restriction on

housing development on the 3HS site has been imposed until traffic issues are investigated and resolved).

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best.

All the local Primary and Secondary Schools are all oversubscribed at present (for example Bleak Hill Primary School is to be extended subject to planning permission being granted, but, these expansion plans are to cater for existing demand and projected increase in primary school age population for Eccleston and Windle due to ongoing and recently completed residential developments in the local area). There will be more school places required if close to 2000 new homes are built on the 8HS and 3HS sites. The IDP does not deal with the long-term impacts of the education needs of new and existing communities.

The IDP also acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided. Whiston and St.Helens Hospitals have long waiting lists above the national average. The A&E department at Whiston Hospital is also overstretched.

Taking all of the above in to account, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely follow that it cannot be considered sound.

Modification:

The IDP is neither clear nor defined and does not present solutions to current or future development issues. St Helens Council needs to provide a more detailed and comprehensive IDP to ensure that any such development proposals that take place in the future are both deliverable and sustainable. Without such a document, the LPSD cannot, and should not be considered sound at inspection.

Section 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)

Yes, I wish to participate at the oral examination.

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

Eccleston Parish Council is a statutory consultee on planning matters. We are also made up of councillors that represent the views and interests of Eccleston residents. Therefore, we feel that it necessary for our elected body to participate in the oral part of the examination.

ECCLESTON PARISH COUNCIL





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

Ref: LPSD

1 3 MAR 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;

Your Detaile

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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
MICC	_ Title:
First Name: BARBARA	First name:
Last Name: ANDERTON	. Last Name:
Organisation/company:	Organisation/company:
Address: 33 DEE ROAD	Address:
RAINHILL NR PRESCOT	
MERSEYSIDE	
13C 91C	
Signature:	Date: 10/3/2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Nould you like to be kept updated of future stage namely submission of the Plan for examination, publicadoption of the Plan)	
Yes (via email)	☐ No
Please note - email is the Council's preferred methode will contact you by your postal address.	od of communication. If no email address is provide

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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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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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.

Policy	LPA 06	Paragraph/ diagram table	3 HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulations Assessment
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Sound'	?				Yes	No		
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The council should not land from greenbelt to	consider removing this to place into safeguarded.
	Please continue on a separate sheet if necessary ccinctly all the information, evidence and supporting
and issues he/she identifies for examination.	ly at the request of the Inspector, based on matters tion; do you consider it necessary to participate at
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 this to be necessary:	the examination, please outline why you consider

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.

In my opinion it is vital to have greenbelt separating areas of urban development. In conjunction with the new building already agreed in the surrounding boroughs of Halton and Knowsley, taking 3HS out of greenbelt and putting into safeguarded would -

- Give the possibility one continuous urban area.
- Put an intolerable strain on the road network in Rainhill. At busy times it is already very difficult to travel on the A57 through the village and the grade 2 listed Stephenson skew bridge over the railway makes road widening impossible. With new development, Rainhill Road and Portico Lane would be heavily congested and all minor roads would become rat runs for people trying to access A57 and M62 junctions 6&7.
- Increase air pollution. Increased / idling traffic is detrimental to health and can cause breathing difficulties, heart problems and certain types of cancer.
- Put a strain on already full to capacity NHS resources, doctors, dentists and hospital especially A&E.
- Increase the probability of flooding in the surrounding houses and on roads. 3HS is already identified as a flood plain so any development would make the situation worse.

We need to

- · Reduce levels of greenhouse gasses.
- · Plant more trees and shrubs not cut them down.
- · Conserve/preserve wildlife, not destroy their natural habitats.
- Maintain open spaces for walking and recreation.
- Prioritise the building of affordable and social housing on the brownbelt sites already identified by St Helens council.

Representor Details

Web Reference Number	WF0385
Type of Submission	Web submission
Full Name	Mrs Julie Andrew
Organisation	
Address	9 Gunning close
	Eccleston
	St Helens WA10 5DP
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?

The state of the s		
Policy	LPA06	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Ref 8HS	

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.
- 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 11:35:58 AM



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.

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This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

1151 13 MAY 5018

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: MARY FREDA	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 122 CLOCKFACE RA., ST. HELENS.	Address:
Postcode: WA9 4QS.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
	Date: 281312019
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Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Planspector's recommendations and adoption of	lan for examination, publication of the the Plan)
Yes ☑ (Via Email)	No 🗌
Please note - e-mail is the Council's preferred address is provided, we will contact you by you	



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13 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
FIREDDY WC	First name:
Last Name: ANG	Last Name:
Organisation/company:	Organisation/company:
Address: H22 CLOCKPACE RD., ST. HELENS Postcode: NA9 4QS	Address:
Postcode: NA9 405	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 28/3/19

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.	



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9 APR 2019

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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

2. Your Agent's Details (if applicable)
(we will correspond via your agent)
Title:
First name: Clockface Johan
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
Date: 1. April 19

Would you like to be kept update Plan 2020-2035? (namely submiss Inspector's recommendations and a	ed of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan)
Yes [(Via Email)	No 🔲
Please note - e-mail is the Council's address is provided, we will contact	s preferre d method of communication. If no e-mail tyou 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.

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Other documents (please name document and relevant part/section)		
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally a compliantion 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 helpfullif you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

As per Clockface Achon 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.

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Part B - Your Representation(s).

PART A - YOUR DETAILS

Ρk

Organisation/company: Address: 35 Growford St Address: Clockface Postcode: WA9 4XQ Postcode: Tel No: Mobile No: Email:	1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Last Name: Appleton Organisation/company: Address: 35 Growford St Clackface Postcode: WA9 4xQ Postcode: Tel No: Mobile No: Email:	Γitle: Mr	Title:
Organisation/company: Address: 35 Growford St Address: Clockface Postcode: WA9 4XQ Postcode: Tel No: Mobile No: Email:	First Name: Paul V	First name:
Address: 35 Grawford St Clockface Postcode: WA9 4xQ Tel No: Mobile No: Email:	Last Name: Appleton	Last Name:
Postcode: WA9 4×Q Postcode: Tel No: Mobile No: Email:	Organisation/company:	Organisation/company:
Postcode: Postcode: Tel No: Mobile No: Email:	Address: 35 Grawford St	Address:
Postcode: Postcode: Tel No: Mobile No: Email:	Clockface	
Tel No: Mobile No: Email:	-	Postcode:
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	Would you like to be kent undated of fut	ure stages of the St Helens Borough Local
Would you like to be kent undated of future stages of the St Helens Borough Local	Plan 2020-2035? (namely submission of th	e Plan for examination, publication of the
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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post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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01744 676190

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Policy	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmenta Assessment		Habitats Regulation Assessment
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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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Part A - Personal Details

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Vivienne	First name: Cladeface Achon Your
ast Name: Appleton	Last Name:
Organisation/company:	Organisation/company:
Address: 35 Crawford St Cladeforce	Address:
Cladique Postcode: WA94XQ	Postcode:
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Signature:	Date: April (9
ease be aware that anonymous forms cannot bomments to be considered you MUST include you	
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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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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.

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



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;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

we will contact you by your postal address.

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

Title: MKS	Title:
	First name:
Last Name: APPLETON	Last Name:
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Address: 14 MELIDEN GARDENS	Address:
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Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred	method of communication. If no email address is provided,

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)

PART A - YOUR DETAILS

1. Your Details

or by email to:

planningpolicy@sthelens.gov.uk

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

art E - Your Representation(s)

ian 5pm dn Wednesday 13th March 2019

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.

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

0 5 APR 2019



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1. Your Details	2. Your Agent's Details (if applicable) and the last row his
(we will correspond via your agent)	Elitali planningpolicy@sthelens.gov.uk
Title: MR	First name: 02744 676190
Last Name: APPLE TON	Last Name: 84918 TX3N
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Would you like to be kept updated of future stage (namely submission of the Plan for examination, puadoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred meth	nod of communication. If no email address is provided

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Part A - Personal Details

Part B - Your Representation(s).

1100

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Fitle: MR	Title:
First Name: PAUL	First name:
Last Name: APPLETON	Last Name:
Organisation/company:	Organisation/company:
Address: 30 GUNNING AFFULE	Address:
ECCLESTON	
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Yes (Via Email)	No 🗀
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Part A - Personal Details

Part B - Your Representation(s).

1110

1 3 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: ・ SHEILA	First name:
Last Name: RPPLETON	Last Name:
Organisation/company:	Organisation/company:
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Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact y	preferred method of communication. If no e-mail you by your postal address.



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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M.R.	Title:
First Name: ALBERT.	First name:
Last Name: APPLE TON	Last Name:
Organisation/company:	Organisation/company:
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Postcode: WA9 402.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
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Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	of the Plan)
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Please note - e-mail is the Council's preferre address is provided, we will contact you by	ed method of communication. If no e-mail your postal address.

Representor Details

Web Reference Number	WF0006
Type of Submission	Web submission
Full Name	Mr Peter Appleton
Organisation	Mr
Address	7 Mill Brow Close St. Helens WA9 4JR
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?

Sustainability Appraisal & Green Belt Review
see question 6 of this questionnaire

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.

The included Sustainability Appraisal states 7 strategic aims, each is addressed below specifically regarding the apparent 'need' for loss of Green Belt land for future development:

1. Supporting regeneration and balanced growth: By definition to regenerate an area is to rebuild and improve an existing urban area, it is not to convert green space into an urban area, it is questioned as to how converting green belt land is a net contribution to regeneration for the future of St Helens (a few one off section 106 agreement payments from developers does not constitute a long term regeneration strategy). Loss of Green Belt land will have little benefit and much drawback on the existing urban areas, through issues such as: increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.

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Whilst 'balanced growth' needs to be sustainable in terms of the environment and balanced across a range of different economic sectors, it is questioned how this will be achieved through loss of Green Belt land. The local environment will be damaged if more Green Belt is urbanised, that is a fundamental impact of replacing vegetation with roads and buildings. With regard to balancing across economic sectors, the plan in item 1.17 of the Dec 2018 Green Belt Review main report identifies 'large scale distribution uses' as a key market opportunity in St. Helens as a factor in the need for Green Belt review. No other economic sectors (except perhaps housebuilding which creates temporary work during the few months of construction only) have been identified in the statements

for 'The Need For A Green Belt Review in St. Helens'. This lack of diversity in economic growth is a fundamental matter in the future of the borough, it is effectively a gamble on a single corner of the market, it is an unsustainable high risk strategy. Therefore the need to address 'balanced growth' has not been met as plan of the proposed plan, therefore need for Green Belt loss has not been justified, and more worryingly the future economic sustainability of the existing urban area appears at risk through lack of diverse economic strategy.

03

2. Ensuring quality development: Quality of development is difficult to ensure with respect to release of significant portions of green belt land as large corporate organisations such as national housebuilders and national commercial developers will likely buy up large plots (as has already been demonstrated in the area) with a view to maximising their profit in developing land. This is at odds with quality development which is more generally seen when smaller scale developments by local persons as they are more accountable to local people and have more personal connection to investing quality in their region. Large scale distribution centres are low quality 'large shed' type buildings offering huge capacity to store goods as their objective, they offer little to nothing with regard to Architectural merit and offer very few employment opportunities relative to the size of the development, which will no doubt reduce further as distribution centres become further automated in future years.

04

We have recently seen similar developments to the North of Warrington at Burtonwood. These series of large shed distribution centres replaced a series of WWII aircraft hangers on seemingly brownfield land, very close to the St. Helens borough, it is questioned also therefore how will quality not be further reduced due to a high supply of such buildings in the area as developers/ landlords cut costs wherever possible to remain competitive.

cut costs wherever possible to remain competitive.

3. Creating an accessible St Helens: Item 1.17 of the main report identifies St. Helens as being in close proximity of the M6, M62, A580 & strategic rail routes. None of these major transport assets are recent developments and all appear to have future capacity problems on the horizon for any noticeable increase in use, it is therefore questioned as to how giving up Green Belt land for housing and employment in mostly large scale distribution can possibly have a positive impact on the accessibly of St. Helens. Quite simply an increase in demand of HGVs (on the road or when loaded onto Goods Trains) for distribution centres and commuters in additional homes will put significant

additional strain on local transport infrastructure, therefore St. Helens is at risk of becoming less

00

accessible though loss of Green Belt land.

4. Meeting housing needs: Nationally it is reported in the media that the UK has a housing stock shortage, however in reality this is very unequal across the country. The south east in particular may have an acute housing shortage, as demonstrated by significant increases in house prices over recent years, however that is not the case in the St. Helens area. Looking at data from the UK House Price Index it appears the average house price percentage increase in England's approximately twice as much as the average increase for St. Helens in the same time period. This implies demand for housing in the St. Helens borough is not outstripping supply and has not done so for a sustained period, therefore it is questioned as to the 'need' to vastly increase the housing stock of the borough through building on Green Belt land, as opposed to the 'want' of housebuilders seeking land which is simple to build on compared to brownfield.

06

5. Ensuring a strong and sustainable economy: It has already been identified in item 1 of this response that plans towards a sustainable economy for St. Helens are seriously lacking with respect to how further Green Belt land may be used for sustainable employment. It is also questioned on what evidence base the claim in item 1.20 of the 'risk that residents would need to move out of the borough' if Green Belt land was released elsewhere rather than in St. Helens. This is a bold claim with serious consequences as to if it can be justified or not. Given: relatively low for England local house prices are, as identified from the UK House Price Index; and the previous identification of good strategic transport assets in close proximity: it is reasonable to assume a significant portion of existing residents work outside of the borough and use St. Helens as a suitable commuter town to larger economic centres such as Liverpool and Manchester — as no doubt will be a similar case for all

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other towns in neighbouring boroughs. It is therefore questioned as to how the decision to not release Green belt land would prompt local residents to move out of the borough to areas which may by then have committed to reducing their Green Belt. This appears an unjustified assumption which misleads the case for a sustainable economy. A further question is raised as to how sustainable economically a set of large distribution centres can be in the long term given the further automation of such activities in future, thus requiring fewer employees and with little incentive for the national and international nature of companies who run these centres to invest in any other aspect of the local economy.

6. Safeguarding and enhancing quality of life: Safeguarding is to protect from harm or damage, it is questioned as to how building on Green Belt land is protecting our health and wellbeing in future years. We have recently seen in national media the UN Global Assessment report declare human activity 'threatens 1million plant and animal species with extinction', with loss of habitat the main significant factor in this, which concerns converting Green Belt land into land for housing or employment. At this time as a society we are on the brink of irreparable damage to biodiversity which will have major impact on human health and wellbeing in future years. At a local level the safeguarding and life quality of local people is put at risk if Green Belt land is lost as biodiversity will be impacted negatively - as it will be cumulatively in every borough of the UK if reports written in a similar manor to this are carried forward without more serious environmental impact assessment and mitigation measures implemented prior to any plans proceeding.

7. Meeting resource and infrastructure needs: Item 1.20 of the main report claims justification for the loss of Green Belt in St. Helens as otherwise it will be lost elsewhere, but this assumption appears based on only immediately neighbouring authorities and not tested against the wider North West region, therefore it is questioned as to the weight given to this assumption in with respect to 'meeting needs' justifying loss of Green Belt. As an example, the relatively low house price value compared to the average for England is a strong indicator that housing resources in St. Helens are not subject to adverse demand to justify thousands of additional units to be built on Green Belt land.

7. Please set out modification(s) you consider are necessary

Wider environmental impact assessment needs to be made with respect to reducing Green Belt land in any area. At what point will Green Belt land be designated to not be given up - once it is all gone? No significant area of Green Belt land should be made available for release to development as the Local plan does not meet its 7 Strategic Aims in the Sustainability Assessment and the just case for Need for Green Belt Review has not been made.

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	5/13/2019 12:53:12 AM
---------------	-----------------------

Representor Details

Web Reference Number	WF0489
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	
Address	8 Mallard Gardens, St Helens, Merseyside WA9 5BL
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	LPC01, LPC02, LPC05, LPD03
Paragraph / diagram / table	7HS
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.

The area is subject to flooding and the underground drains only just cope with the heavy rain due to previous low lying land and 3 x ponds that were previously in situ around Broadlands and the three closes including Mallard.

There are too many houses being built in the area and insufficient roads to be able to cope with the additional traffic. This will cause heavier use of the roads. At present it can take 20 minutes to get out of our close at present and this is before the end of Elton Head Road is opened up to all the new houses there

The road and drainage will not be able to sustain more houses plus the infrastructure as there were multiple power cuts when the Broadlands were being built and also the Larches and Retirement village on Elton Head Road.

The field is also one of the last pieces of open land in the area now that Riverside and the Sutton sites are being built and the industrial units on the link way will make the area look more city than country. Building more houses on open land is unecessary and there are many existing sites that can be redeveloped rather than destroying more green belt land.

The council needs to gain more funds because of cuts but to destroy the areas for short term gain and put additional strain on the infrastructure and make the area more like one huge housing estate is ludicrous and unjustifiable.

7. Please set out modification(s) you consider are necessary

Review the actual turnover of homes and what is being sold before deciding to build even more homes without the supporting schools, hospitals, utilities and roads and look at rebuilding areas that already have had buildings and get the builders to use those sites rather than destroy virgin green 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	1/21/2019 8:52:56 PM
	, ,

Representor Details

Web Reference Number	WF0312
Type of Submission	Web submission
Full Name	Mr Keith Appleton-Derrick
Organisation	
Address	22 Thames Road
	St Helens
	Merseyside wa9 4hb
Agent Details	

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Yes (via e-mail)

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

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Policy	St Helens plan 2020-2035
Paragraph / diagram / table	GBP_074_C, GBP_074_D, GBP_74_B
Policies Map	
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Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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Lack of communication between the council and the local residents, a vast amount of residents will be impacted and minimal numbers are currently aware of this vast amount of green belt will be used as development

7. Please set out modification(s) you consider are necessary

Minimal of postal documents to all resident is the surrounding areas, adverts in the local newspapers on consultations. Local councillors to be proactive in resident communications. A poor standard of engagement for all residents concerned, St Helens council's pure lack of understanding.

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

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Part B - Your Representation(s).

PART A - YOUR DETAILS

3 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MC	Title:
First Name: Kevin	First name:
Last Name: Ardom	Last Name:
Organisation/company:	Organisation/company:
Address: Tunstalls Form	Address:
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Plan 2020-2035? (namely submission Inspector's recommendations and adoptions and adoptions are submission.)	f future stages of the St Helens Borough Local of the Plan for examination, publication of the otion of the Plan)
Yes [(Via Email)	No 🗌
Please note - e-mail is the Council's praddress is provided, we will contact you	eferred method of communication. If no e-mail u by your postal address.

RETURN DETAILS

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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-

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or by e-mail to:

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Telephone:

01744 676190

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

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

1 3 MAR 2019



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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LORRAINE	First name:
First Name: LORRAINE Last Name: ARMSTRONG	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode: Tel No:
	Mobile No:
	Email:
Signature:	Date: IIR March 2019.
lease be aware that anonymous forms cannonments to be considered you MUST include Would you like to be kept updated of fut	de your details above.
Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	of the Plan
Yes (Via Email)	orthornan)

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 w	hich pa	t of the Loca	al Plan	does this repr	resentation relate?	
Policy	06	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other of docume part/see	ent and	its (please n relevant	ame			
7.5						
Please I	read the	Guidance not	lelens B e for exp	orough Loca	Plan 2020-2035 is:	Tests of Soundness
Legally	Complia	ant?	Ye	s 🗆	No 🗷	colo di codifulless
Sound?)		Ye	s 🗆	No 🗹	

Cooperate
Please tick as appropriate

Complies with the Duty to

5. If you consider the Local Plan Please read the Guidance note for a	is <u>unsound</u> , is it because it is not: explanations of the Tests of Soundness
Positively Prepared?	M Section Section 1
Justified?	Ø
Effective?	Ø
Consistent with National Policy?	Ø

No W

Yes 🗆

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>

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

Poor consideration if any to the inevitable increase in traffic to motorways. Wavington Rd, Rainhill is already at maximum level during peak. School times. The alternative route of mill Lane to Whiston Hospital for emergency retrictes is already stretoled. Patients using MillLane are subject to additional discomfact due to the large amount of calming measures. Tull and extensive investigations into traffic measures in Rainhill don't appear to have taken place in respect of 3HS.

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.

Carry out lengthy (not one or two days) investigations into the volume of traffic already woing Rainhill as a route to Whiston Hospital, M62/M57, all school traffic affected in the areas of 3H5. * Access roads from new development.

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 y the o	our representation is seeking a modification ral part of the examination? (the hearings in	; do you consider it necessary to participate at public)
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

P. 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.



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Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address



1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent	
First Name:	First name: First Name:
Organisation/company:	Organisation/company:
	u Coc-d Address:
Muzyno	U
Postcode: WA9 4	Q L . Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: _	Date: 25-3.19
Please be aware that anonymous for considered you MUST include your	rms cannot be accepted and that in order for your comments to be details above.
Nould you like to be kept updated namely submission of the Plan for eadoption of the Plan)	I of future stages of the St Helens Borough Local Plan 2020-203 examination, publication of the Inspector's recommendations and
Yes (via email)	Ø No
Please note - email is the Council's	preferred method of communication. If no email address is provide

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

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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Telephone: 01744 676190

NEXT STEPS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Marren	First name:
Last Name: ASNCTOFY	Last Name:
Organisation/company: ALD I	
Uphol/and	Address:
	Postcode:
Tel No:	Tel No:
Mobile	e No:
Email:	:
Signature:	Date: 03/03/2014
Please be aware that anonymous forms canno considered you MUST include your details abo	t be accepted and that in order for your comments to be ove.
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

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3. 10 Which p	art of the Local Pl	an does this repre	sentation relate?	
Policy HA LPAS -	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)		
	nsider the St Helen I the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Comp	liant?		Yes No	
Sound?			Yes No	
Complies with	the Duty to Coope	rate	Yes No	
Please tick as	appropriate			
Positively Prep Justified? Effective?	2 mar (1 merc) and		f the Tests of Soundness	
or fails to d If you wish use this bo	to support the leg ox to set out your o	ty to cooperate. Pal compliance or someonts.	cal Plan is not legally con lease be as precise as po soundness of the Local F	ossible.
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	Delete	LAND	from	Propo	gent	self rl
				Please d	ontinue on a separa	te sheet if necessa
	ally be a subsequent	opportunity to	make furthe	r representation	ns based on the	e originai
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Please keep a copy for future reference.

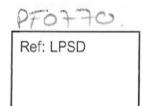
7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this

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3. To which part of the Local	Plan does this repre	sentation relate?	
Policy Paragraph/diagram table LP ADB BIVEN 6	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please nan document and relevant part/s			
4. Do you consider the St He Please read the Guidance r	선물 경영 경기 시간 중요한 경기를 가게 되었다. 그 경기 기가 있다.		ne Tests of Soundness
Legally Compliant?		Yes No	
Sound?		Yes No	
Complies with the Duty to Coc	perate	Yes No	
Please tick as appropriate			
5. If you consider the Local I			
Positively Prepared? Justified?			
Effective?			
Consistent with National Policy	<i>o</i>	~	
6. Please give details of why	you consider the Lo	cal Plan is not legally co	mpliant or is unsound
or fails to comply with the If you wish to support the use this box to set out you	duty to cooperate. P legal compliance or s	ease be as precise as po	ossible.
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from propried
Remarch greenbelt



(For official use only)



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	Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title: Has. S. ASHTON	Title:
		First name:
		Last Name:
	Organisation/company:	Organisation/company:
		Address:
		Postcode:
		Tel No:
		Mobile No:
		Email:
		* .
	ž 2	1 1
	Signature	Date: 20/2/2019
	Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
	Would you like to be kept updated of future stages (namely submission of the Plan for examination, publicadoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? ication of the Inspector's recommendations and
[Yes (via email)	☐ No
,	Please note - email is the Council's preferred method we will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/2004/5/cd	actives the terror to the community of the second of the second of the second second second second of the second o

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3. To w	hich pa	rt of the Loca	l Plan c	loes this re	epresent	ation relate?				
Policy LP AOS.	SITE	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	R	abitats egulations ssessment		
	Other documents (please name document and relevant part/section)									
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	Complia	ant?			Yes	☐ No				
Sound?				731	Yes	No				
Compli	es with th	ne Duty to Coo	perate	- [Yes	No				
Please	tick as a	ppropriate								
		l er the Local I ne Guidance r				use it is not: ests of Soundness	3			
Positive	ly Prepa	red?		1	1		100			
Justified	1?			1						
Effective	∍?			. A	\preceq					
Consiste	ent with I	National Policy	/?	1	Z		¥			
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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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 matter	relatinca the L sugg	pliant or sound, having es to soundness (NB properties of modification and composite of Plan legally composited revised wording	please note at examinat pliant or so g of any pol	that any no ion). You wil und. It will b icy or text. F	n-compliance Il need to say e helpful if y Please be as	e with the do why this mou are able precise as p	uty to coop nodification to put forw possible.	perate is n will make ward your
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 matter and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate the oral part of the examination? (the hearings in public) No, I do not wish to participate at the oral part of the examination, please outline why you consider.	Ple	are delete	this	land	from	He -	froftos	red
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 matter and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate the oral part of the examination? (the hearings in public) No. I do not 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	la	nd removal	from	the	Grænbel	b.		
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 matter and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate the oral part of the examination? (the hearings in public) No, I do not 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								
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9. If you wish to participate at the oral part of the examination, please outline why you consider	and issu	ues he/she identifies for	er examinati eeking a mo	on. dification; c	lo you consid	- 175 - 175		
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who								

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

Please keep a copy for future reference.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

1800756M

Representor Details

Web Reference Number	WF0015
Type of Submission	Web submission
Full Name	Mr David Ashton
Organisation	
Address	35 Bold Road
	Sutton
	St. Helens
	Merseyside WA9 4JG
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	3HA, 4HA, 5HA
Paragraph / diagram / table	3HA, 4HA, 5HA
Policies Map	3HA, 4HA, 5HA
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:

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.

Leave the natural environment alone.

There are already tens of thousands of empty homes all over the district of St. Helens, house people there.

Growth for growths sake is shortsighted and unnecessary. We are facing the tipping point of an irreversible global climate crisis. We will need all the natural countryside we can get. Building upon it with only further exacerbate the problem.

St. Helens has an alarmingly high suicide rate, more grey warehouses and factories won't make anyone feel any better, and will contribute to the already oppressive and run down aesthetic here. There aren't enough trees in St. Helens as it is, so removing more is the last thing we need to do.

7. Please set out modification(s) you consider are necessary

Turn it into a publicly owned park / nature reserve.

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:

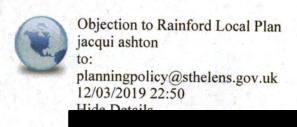
Response Date	4/30/2019 9:17:57 PM

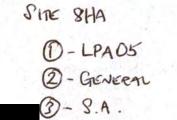
RO0061



> 0 - OLC PARA 1.7.2

B-LPAO2





1 Attachment



REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD.docx

See attached Representation.

Sincerely Jacqui Ashton

REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD

Name: Jacqueline Ashton

Address; 79 Rookery Lane, Rainford. St Helens. WA11 8BL

I am a Rainford resident

I am horrified at the proposed removal of greenbelt status and subsequent development plan for around 1200 houses across the six greenbelt sites

In relation to Rainford, my reasons for my opposition of the plans are as follows:

within the village, (and also the 2000 plus across other greenbelt sites in St Helens).

The scale of the proposed development in Rainford is disproportionate, given the size of the village. It will increase the village footprint by a third.

The existing infrastructure is barely coping with the demands on it currently, as illustrated below:-

There are major parking problems in and round the village centre already- these present a risk to safety on the roads and also compromise our elderly residents accessing the shops and amenities easily. The road junction adjacent to the Village Hall, when turning right down Church Rd is already dangerous due to traffic coming around a blind bend in the other direction. The risks of a road accident have increased here since Thickwood Moss Rd became one way and there is now a need for a mini roundabout. I mention this as illustrative of how the wider impact of seemingly small changes to infrastructure- if not thought through holistically, can be detrimental to the environment and public safety - yet change on the scale proposed in the Preferred Options contain no details of how infrastructure and increased traffic— including heavy construction vehicles over an unknown period of development - will be managed safely.

I am also very concerned that emergency vehicles such as fire engines would not be able to access the two residential roads either side of the Co-op Supermarket and RED café in the event of an incident.

As congestion is still a problem, despite traffic management strategies having been completed in 2016 along the Church road section where the village centre shops are situated, I am certain this situation can only get worse with the Council's proposals designed to increase the village population and accompanying traffic so drastically.

Rainford residents already have to wait up to several weeks for access to GP appointments in both surgeries. We have recently lost one full time GP, with no plans to recruit a replacement at the Higher Lane surgery.

There is no NHS dentistry service meaning many of our citizens have to travel out of area.

In relation to public services – Rainford has lost its bank, the police station is not manned and the library hours have been reduced. The bus service is inadequate, with a very scant service

compared to other areas of the Borough, whilst the train station at Rainford North End has limited parking and limited direct destinations. The Council has not reassured Rainford constituents how these services will develop in order to accommodate the proposed increased population. / The three primary schools are at capacity in terms of the numbers they can accommodate on site, they do not have capacity for expansion. The secondary school has already been rebuilt to maximise its potential for accommodating secondary education students. There are existing drainage problems in and around the village, as evidenced by last year's floods, though the issue of flooding has been known about for many years by St Helens Council. Rainford has a high water table and relies on agricultural land and greenspace as 'soak away'. The scale of the tracts of housing development across the 6 sites will only increase the flooding risk though no account appears to have been taken of this within the proposals. In coming to their proposals the Council is failing to take account of Climate Change which adds to the flooding risk and also ignores government policy guidelines on the protection of green space and sustainability. 1 Allowing housing development upon current greenbelt will further increase the risk of flooding that is already an issue - especially to houses on Higher Lane and Rookery Lane but also to the Beech Gardens area which were very badly affected in the past year and lie approximate to Lords Fold area and Rainford Brook (which has had no improvement works carried out to prevent a recurrence to my knowledge). It is difficult to see where the infrastructure can be improved in order to reflect the increased demand from the population who would be residing in those circa 1200 homes -average households now have at least two cars, furthermore the proposed housing is for family homes so we are talking an influx of at least 3000 people in the first wave, 2000 more cars in a semirural village community where the amenities and infrastructure are already at capacity. Within the proposed plans there is no acknowledgement of the impact the proposals will have on the infrastructure of the village at all. Within the plans there is a failure to acknowledge the £6 million planned improvements to the Windle Island area to ease congestion. These measures will prove inadequate if the proposals go ahead given the planned expansion to Rainford's population as they are based on current traffic levels. These points I raise show that the proposals are not sustainable yet sustainability is a basic premise when considering removal of greenbelt to allow new developments of this kind. The National Planning Policy Framework states that greenbelt should be protected in order to I. Prevent urban sprawl.

- 2. Safeguard the countryside from encroachment.
- 3. Preserve the setting and character of historic towns/villages (Rainford is a heritage site).
- 4. Assist urban regeneration by recycling derelict and Brown Land.
- 5. To conserve visual amenity and biodiversity.

In St Helens we have a lower population than 30 years ago (Official Census years 1981 through to 2011). Despite the statistics cited by the LPA- which the census figures disprovethere is no housing crisis, as the Plans would have us believe.

Why, based on the Councils own figures- when it is claimed that St Helens population will increase by 6843 in the future, are their preferred option proposals to build almost double that amount of new houses (13110)?

Why, when we are an ageing population (the Council's own figures state there will be an increase by 15000 in the 65 and over age group, and 8000 fewer people under 65) are the proposed developments in Rainford predominantly family homes. What of the elderly and their housing requirements?

Currently there are 3500 empty homes in and around St Helen -almost the amount required according to the local plan (4000 homes) - whilst Government policy requirement is to prioritise the refurbishment of such housing stocks, bringing them back into use, if necessary using compulsory purchase powers before consideration of other development means.

Having such a large number of empty (and decaying?) properties across the Borough (4.5% of the housing stock- almost double that of its neighbour Halton!) is detrimental to St Helens, whereas the re-categorisation and subsequent development on all of the Towns greenbelt not only fails to address this issue but will also destroy forever the visual and recreational amenity such areas provide.

What of the Brownland stocks across St Helens, I was unable to access the brownland register which the Council has not made publically available. Government policy is to develop brownsites before resorting to removal of greenbelt only under exceptional circumstances. There are no exceptional circumstances in this case, except the Council's greed for revenue that is not in the wider interest of its tax paying population.

Turning specifically to the Rainford at-risk greenbelt, as well as being Grade A agricultural land, that is more productive now than ever in its history, it supports the local and wider economy, local employment and wildlife biodiversity.

It provides a valuable visual amenity that supports sport and leisure facilities and overall offers a rich environment for rural tourism in Rainford. There are cycling groups, ramblers associations, horse riders and birdwatchers coming specifically into Rainford for its village character, and culture.

Turning specifically to HS21, HS20 and HS21) those farms that have diversifies into equestrian business that will be directly reflected by the Local Preferred Options. I know that two of these local businesses are reliant on livery for horses for their livelihoods, neither are

REFORD TO LIPPO SITCH NO-LONGOR BEING TORKN FORWAS. the elite landowners wishing to cash in, but tenants who work hard and whose business also support associated local agricultural-related industry – feed and bedding merchants, hay/haylage /straw producers, farriery, livery services and who have important stewardship responsibility for the land and wildlife thereon.

The removal of the greenbelt and subsequent development will change the character of these areas forever - as an example, Holiday Moss farm has 60 plus horses, all of these are owned, loaned, ridden, cared for and enjoyed by 100 plus people, their friends and families. Multiply this by the other livery areas affected and Rainford stands to lose essential character and valuable income associated with this lifestyle.

NOT REUSUNIA

Horses need acreage to graze, their action on the land supports habitat and food sources for birdlife, the paths around these farms are used by dog walkers, ramblers and family groups etc – Will they come in future to walk through the housing estates envisaged by the Council? To Let I doubt it! Grazing land will be lost, and the associated benefits of outdoor lifestyle enjoyed by many will be compromised.

The case for the Council's preferred options is essentially flawed, its own figures dispute the need for the scale of housing development on Rainford's greenbelt that they are proposing, whilst failing to state the negative impact on infrastructure, pollution levels, village character and green spaces this will have - all of which are proven detrimental to physical and mental wellbeing of those living in Rainford and those who visit for the leisure and recreational opportunities that this heritage village offers.

I would also like to add, in respect of the overall figures in the Plan, that the case for development is essentially flawed for the following reasons:

- 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

0

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. I 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. • 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 Sincerely Jacqui Ashton

Concerned householder

RO0062



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 <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

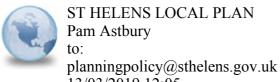
Part B – Your Representation(s).

PART A - YOUR DETAILS

eros YAM E 1

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)		
Fitle:	Title:		
First Name:	First name:		
JEHN MALCOLM			
ast Name:	Last Name:		
ASPINALL			
Organisation/company:	Organisation/company:		
Address: 21 PENDLEBURY ST	Address:		
Clock FARE ST HEL	LENS		
Postcode: WAG LARF	Postcode:		
Tel No:	Tel No:		
Mobile No	Mobile No:		
=mail:	Email:		
Signature:	Date: 1610412019		
ease be aware that anonymous forms omments to be considered you MUST	s cannot be accepted and that in order for your include your details above.		
Would you like to be kept updated Plan 2020-2035? (namely submission Inspector's recommendations and ad	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the loption of the Plan)		
Yes ☐ (Via Email)	No 🗌		
— ` '	preferred method of communication. If no e-mail		

RO0063



13/03/2019 12:05

F.A.O. THE PLANNING OFFICER

From: Pam Astbury, 77 Church Road, Rainford, St. Helens. WA11 8EZ

I would like to take this opportunity to comment on the proposals to release Green Belt Land in the St Helens Borough.

I am a resident in Rainford and believe that the Grade 1 Agricultural Land in the area should be preserved, particularly with the political uncertainty the country is facing at the present time.

I understand that Green Belt Land should only be released in exceptional circumstances.

There are sufficient Brownfield Sites to support the housing need.

The 259 houses proposed on the Top Quality Farming Land in Rookery Lane/Higher Lane, Rainford would bring increased traffic problems to a Village, which already struggles with the amount of vehicles on the roads. There would be an impact on the environment, schools, 6th form technical college, doctors, dentists, wildlife and the risk of flooding.

I trust that you will consider my comments when making a decision..

COULD YOU PLEASE ACKNOWLEDGE RECEIPT.

Sirv 8HA



FW: ST HELENS LOCAL PLAN Pam Astbury

planningpolicy@sthelens.gov.uk

15/03/2019 12:32

From: Pam Astbury

Sent: 13 March 2019 12:05

To: planningpolicy@sthelens.gov.uk Subject: ST HELENS LOCAL PLAN

F.A.O.

THE PLANNING OFFICER

From:

Pam Astbury, 77 Church Road, Rainford, St. Helens. WA11 8EZ

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I trust that you will consider my comments when making a decision..

COULD YOU PLEASE ACKNOWLEDGE RECEIPT.

RO0064



Submission to Draft Local Plan Peter Astles

11/03/2019 16:03

Cc:



(1) - LPCO6 (2) - Gew (3) - LPAO4

2 Attachments



PBA representation Draft Local Plan 2019.pdf



PBA representation form - St Helens MBC Draft Local Plan 2019.pdf

Please find attached my submission to local plan and response form.

I have ticked on the response form to orally present at the hearing if possible I would like to raise a point about specific biodiversity planning

Peter Astles



Virus-free. www.avast.com



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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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.

 Your Agent's Details (if applicable) (we will correspond via your agent) 	
Title:	
First name:	
Last Name:	
Organisation/company:	
Address:	
Postcode:	
Tel No:	
Mobile No:	
Email:	
Date: 11th 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	et you by your postal address.	

RETURN DETAILS

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

post to:

Local Plan

WA10 1HP

St.Helens Council

Town Hall Victoria Square St.Helens Merseyside

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 <u>PART B</u> 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.

	erore you complete				
3. To which	part of the Local F	lan does this repre	esentation relate?		
Policy LPA 10	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
document a part/section					
			Plan 2020-2035 is: egal Compliance and the	Tasts of Soundhass	
Legally Cor		Yes	No 🗆	esis or Soundness	
Sound?		Yes 🗆	No X		
Complies w Cooperate Please tick as	vith the Duty to	Yes 🗆	No X		
Please read Positively P Justified? Effective?		or explanations of the X X X	because it is not: e Tests of Soundness		
or fails to co	omply with the duty	to cooperate. Plea	ocal Plan is <u>not legally coase be as precise as pos</u> undness of the Local Pla	ssible.	
Please see Final sent v		onse to St Helens	Local Plan Submission	Draft January 2019	

	Please continue on a separate sheet if necessa
ompliant or sound, having regard to the national lates to soundness (NB please note that capable of modification at examination). e Local Plan legally compliant or sound.	consider necessary to make the Local Plan legally matter you have identified at 6. above where this t any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.
lease see my document response to St F inal sent via email.	Helens Local Plan Submission Draft January 2019
nai sent via eman.	
	Please continue on a separate sheet if necessa
lease note your representation should c	cover succinctly all the information, evidence and
	ort / justify the representation and suggested
odification, as there will not normally be presentations based on the original repr	a subsequent opportunity to make further
	vill be only at the request of the Inspector, based
n matters and issues he/she identifies	s for examination.
	ification; do you consider it necessary to participate a
If your representation is seeking a modi	
	mige in pasite)
e oral part of the examination? (the hear No, I do not wish to participate at the oral examination	

vish to prese	nt the proposal	for more effectiv	e biodiversity pr	otection via impr	oved
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Th	ank you for taki P	ing the time to co lease keep a copy	mplete and retur	n this response tence.	form.

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RESPONSE BY

PETER BRIAN ASTLES

COMMUNITY GROUP OUR LOCAL VOICE

81 THE PARCHMENTS

NEWTON-LE-WILLOWS

MERSEYSIDE, WA120DX

THE RESPONSE IS IN TWO PARTS

- 1 BIODIVERSITY ACTION PLAN SECTION A
- 2 GENERAL COMMENTS SECTION B

<u>SECTION A – BIODIVERSITY ACTION PLAN</u>

Refers to

Policy LPA03 Development Principles

Policy LPA04 A Strong and Sustainable Economy

PolicyLPA04.1: Strategic Employment Sites

Policy LPA09m Green Infrastructure

PolicyLPA11 Health and Wellbeing

Policy LPA10 Parkside East

NPPF Statement

"The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature"

The Issue

St Helens MBC Draft local plan is ineffective in that it does not contain or any reference to Biodiversity Planning.

Whilst there are a number of general references and broad objectives to local biodiversity the plan contains no enablers to preserving or mitigating harm to local wildlife. Many areas of the St Helens borough are rich in wildlife and contain a variety of species that have existed in the borough for centuries. They are part of the fabric and character of the lives of local people and contribute to general well being. Simply inserting general objectives that without facilitation methods make St Helens MBC LP objectives meaningless and hence the plan ineffective and unsound. Where very large areas of land are to be developed, where it can be demonstrated that high quality local habitat and biodiversity, will be negatively impacted.

Then the local plan should include specific provision for biodiversity planning.

Currently this is absent in the draft local plan

What is Biodiversity Planning?

This is the specific recognition of the habitat and species in the area proposed to be developed, particularly very large scale projects in green belt and local countryside. The recognition of the potential harm to those species and the provision of specific mitigation measures. It is accepted that is land is proposed for commercial development it will not be possible to maintain the existing habitat and full biodiversity scale. However if the guidelines of the NPPF are to be achieved and St Helens Councils

own objectives then some form of facilitation capacity must be inserted into the local plan. Otherwise mitigation is impossible and simply lost in the fog of generalised and meaningless planning jargon.

The NPPF includes now specific provision for protection of local wildlife sites.

Local examples are Willow Tit, Barn Owl, and Brown Hare some of which have formed part of Wigan Metros Greenheart Project working alongside Lancashire Wildlife Trust. Birchwood Business Park via deliberate planning and habitat development is one of the best regional locations for Long Eared Owl. Chester Business Park by cultivating wild grassland habitat encouraging the vole population has preserved the Barn Owl population which now thrives alongside the business park. Local employers in the business park contribute financially to this scheme in addition to employees volunteering in community events with Cheshire Wildlife Trust. These are positive schemes where commercial development can sit alongside biodiversity and in some cases enhance it. This is absent from the St Helens MBC draft plan.

https://www.wildlifetrusts.org/news/some-protection-reinstated-

risk-local-wildlife-sites

The St Helens Local plan in its current version only logs local regional wildlife sites none of which are in the St Helens Borough. Whilst no doubt this is adherence strictly to planning guidelines surely it cannot be in the spirit of the NPPF to exclude potential and existing local wildlife sites in the plan area? Whilst the local

plan does point to Bold Forest Park, Sankey Valley and Lyme and wood pit Country Park these are essentially used as justification for ignoring biodiversity planning elsewhere. Bold Forest Park, Sankey Valley and Lyme and wood pit Country Park are not new areas of countryside they are simply designated as country parks. In order that future generations will have wildlife enjoyed by previous generations (as the NPPF directs) an interconnecting wildlife network and corridors should form an element of the 2020 – 2035 local plan. Tactically backed by biodiversity planning in areas appropriate such as large scale commercial development on local countryside.

This to be part of a spatial plan "what type of place St Helens borough" is to be from the context of biodiversity.

Local Examples of Biodiversity Planning alongside strategic commercial development

Birchwood Forest Park – forest park alongside Risley Moss SSSI.

This is integral with a large business park. Warrington MBC

Three Sisters Local Nature Reserve – Ashton in Makerfield – This is integral with a business centre and logistics facility. Wigan Metro

Chester Business Park – Biodiversity Planning integral with strategic business park with a number of large employers

These sites have specific biodiversity action plans and are part of interconnecting wildlife corridors planned by the borough e.g.

Project Greenheart Wigan Metro

Parkside West and East

This site is an example of where such biodiversity plans could be developed with perhaps input from local wildlife trusts and relevant societies. However this may be valid in other areas of the borough where major development is occurring on a scale where biodiversity is threatened to a degree that it can be said to impair St Helens MBC biodiversity objectives.

Parkside East and West and its importance to regional biodiversity (including its proximity to SSSI) are set out below.

Background

<u>Highfield Moss SSSI</u> – this was designated as SSSI in 1986. It is, and remains, one of the last natural mires in Lancashire.

It contains a number of rare plant and insect life. It is one of the few areas in Great Britain where the Marsh Gentian thrives. The importance of Highfield Moss is in three areas

- 1 Mixed Valley Mire
- 2 Acidic Marsh Grassland
- 3 Unimproved Acidic Grassland

In 2015 Lancashire Wildlife Trust undertook extensive work on a management plan for Highfield Moss. One of the key components was the re-wetting of the moss to preserve the mire and habitat.



Highfield Moss SSSI – Lancashire Wildlife Trust improved the hydrology of Highfield Moss in 2015.



Marsh Gentian at Highfield Moss.

The marsh gentian is a very rare plant found in Acidic Bogs, it is only found in three places in England of which Highfield Moss is one.

Highfield Moss is also a very well known site for Dragonflies. One is the Black Darter Britain's only black dragonfly and species found in marsh and acidic areas such as Highfield Moss.

Land around Highfield Moss, including Barrow Lane.

Highfield Moss and Barrow Lane are well known sites for local birdwatchers and naturalists. The very popular Manchester Birding Website which covers bird sightings for the North West Region has sections dedicated to each of these sites.

https://manchesterbirding.activeboard.com/

Both sites are valuable because of their habitat which including Parkside West covers a diverse range of habitat.

Broad Leaved Woodland

Wetland

Scrub and Heath

Wetland

Acidic Wetland

Agricultural Land

The area also acts (in classic green belt design) as a green buffer between town in this case Lowton, Newton-Le-Willows, Winwick and Kenyon. This is the prime (and only) habitat of its type and diversity in the local area. Its loss or unrestricted commercial development will have devastating consequences for

Spring and autumn migration corridors

Wildlife corridors in general

Breeding habitat for indigenous birds and spring migrants from Africa and Southern Europe.

Habitat areas for feeding and foraging

Wildlife in the area include a number of red listed species (species at risk of ultimate extinction) which rely on the existence of the habitat, such as

Skylark

Grey Partridge

Corn Bunting

Yellow Wagtail

Lapwing

Ringed Plover

Woodcock

Cuckoo

Merlin

Willow Tit

Starling

Fieldfare

Song Thrush

Redwing

Mistle Thrush

Whinchat

Tree Sparrow

Grey Wagtail

Linnet

Yellowhammer

Grasshopper Warbler

Although not currently red listed a number of Owl Species are resident or overwinter in the land proposed to be developed upon

Barn Owl (In past decade been subject to local recovery programmes via the Barn Owl Trust)

Tawny Owl

Little Owl

Short Eared Owl (Overwintering from Scotland / Scandinavia)



Barn Owl Nest Box on private farm buildings near to Parkside East

In addition to bird life the area also is one of the few areas left that contains the endangered Brown Hare.

Roe Deer also regularly roam the area. Other mammals such as hedgehogs, stoats, weasels, field and wood mice are also present.



Evidence of badgers has been found in the area.

Dead badger June 2015 Winwick Lane RTA

SECTION B - GENERAL COMMENTS ON LOCAL PLAN

PEOPLE OBJECTIVE – LOCAL PLAN – CONCERNS OVER MANAGEMENT OF DRAFT LOCAL PLAN

There have been concerned over St Helens MBC's approach to the local plan and engagement with the public one of the core strands of the governments planning policy.

The approach has been one of confrontation with the public leading many members of the local public to believe largely their input will be ignored

The following supports this perception

A very febrile relationship has developed with the council over the local with senior councillors trading insults with the public over social media.

One example of many below this one from the then leader of St Helens Council

https://www.sthelensstar.co.uk/news/15257511.star-readersreact-to-nimby-comments-by-council-leader-towards-green-beltgroup/

There have also been cases of senior councillors have been subject to council internal disciplinary hearings ostensibly within the context of the local plan.

The following council meeting approving the draft local plan 19th December 2018 gives some insight into this confrontation. Whereas it is accepted politics is a passionate environment between competing parties but rarely are the electorate under such attack as is witnessed in this council meeting. Local countryside referred as "concrete coffin" deliberately provocative in the knowledge the public may have an opposing view. Other comments that it was the government that drove the changes. Implying the record 5,625 responses of the public had no effect. Interspersed with insults to the public and childish references to online confrontations.

From St Helens Council Webcast Portal - Full Council Meeting

https://sthelens.publici.tv/core/portal/webcast_interactive/390498

Whilst this has no relevance to the content of the plan this does reflect very badly on the core strand of public engagement.

It is necessary and unprofessional

I wish this aspect to be directly brought to the attention of the inspector

ST HELENS COUNCIL DIRECT FINANCIAL INTEREST IN CORE
LOCAL PLAN COMMERCIAL STRATEGIES

2

The Parkside development is managed via a joint venture partnership Parkside Regeneration LLP. The funding for this is largely provided by St Helens MBC

The Parkside Development is a very large part of the draft local plan commercial development. The draft local plan is a facilitator of this, the local plan is also the councils own document.

The NPPF prescribes that developments are planning led. It naturally follows that such plans should have the confidence of the local public that they are objectively assessed.

Given the council would lose substantial investment in the several millions if the venture was not approved and the matters rose in the previous point.

It's hard not to conclude public confidence in the integrity of the process is almost nonexistent and is "failure to co-operate

PARKSIDE WEST REMOVAL FROM DRAFT LOCAL PLAN

There is no provision for Parkside West in the local plan. Despite this being in the preferred options stages and despite no planning hearing or examination of local plan by inspector. Parkside west is in the existing 2012 local plan and the protections within CAS3.2 and the inspector's recommendations have been removed.

These were hard won protections by the local public and approved by the inspector and now removed without explanation

LOCAL EMPLOYMENT INSUFFICIENT POSITIVE PREPARATION

Future employment and growth in the borough is largely dependent on Logistics. A sector the St Helens Authority will be in direct completion with nearby authorities, particularly Warrington. There is little in the draft local plan in any other sector despite the regeneration of the North West and the growth of Liverpool and Manchester conurbations. The future St Helens is to be a backwater with little other than warehouses providing employment and multiplier growth. The plan has the hallmarks of the easy option and even that supported by public funds.

Given the councils own financial interest in these warehouse developments there is concern the plan is insufficiently positively prepared.



NEWTON-LE-WILLOWS INFRASTRUTURE AND PRESSURE ON GREEN BELT

Newton-Le-Willows are in the local plan taking large areas of green belt for both new housing and vast warehouse complexes. The latter almost as big as the town itself. There is little or no road infrastructure being put in place to mitigate this. The area already suffers from high congestion and much of the town is in Air Quality management measures. It is recognised thanks to the efforts of local councillors the housing growth has been reduced from that in the preferred options. Whilst this is very welcome the town of Newton-Le-Willows is in a very precarious situation having similar housing to other areas of the borough yet also being future home to one of the biggest logistics complexes in the country.

This is ineffective preparation and this aspect should be subject to further examination.



RO0065



Proposed change to Green belt at site AC 03

Keith Atherton to: planningpolicy

12/03/2019 16:43

From:

Keith Atherton

To:

planningpolicy@sthelens.gov.uk

Sirs,

Our serious concern with a removal of the site from the green Belt is that, without the protection of the green belt, the way will be open for plans to be accepted for developments that will be out of keeping with the existing listed buildings and be extremely detrimental to at least six properties that back on to the site.

At this stage, we believe that it is not possible to make further specific comments about the proposal.

Yours faithfully,

W.K. and Mrs. M. Atherton 15 St. Marys Avenue Billinge Wigan WN5 7QL

Sent from my iPad



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

Ref: LPSD

1 3 MAR 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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M.	Title:
First Name ROBERT	First name:
Last Name: ATMERTON	Last Name:
Organisation/company:	Organisation/company:
Address: 2 HOWFURD MILL CO SELKIRIK Postcode: TO7 SJH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 21/02/19

	ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Councaddress is provided, we will conta	cil's preferred method of communication. If no e-mail act you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> 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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Telephone:

01744 676190

NEXT STEPS

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Now please complete <u>PART B</u> 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.

Policy	part of the Local F	Policies	Sustainability	Habitats
Folicy	/ diagram / table	Map	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
	iments (please nam and relevant n)	ne		
CONTRACTOR OF THE PARTY OF THE			Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Co	mpliant?	Yes □	No □	
Sound?		Yes 🗆	No 🗵	✓
Complies v	vith the Duty to	Yes 🗆	No ⊠] ✓
Please tick a	s appropriate			
Positively F Justified? Effective? Consistent	repared? with National Polic	y? 🗵		
or fails to c	comply with the duty	to cooperate. Ple	ocal Plan is <u>not legally case be as precise as po</u> oundness of the Local P	
	out your comments			
Green Belt, is	s more vulnerable to de	evelopment without the	e protection of an up to date,	adopted local plan.
National Plar a) Positively b) Justified – would erode	nning Policy Frameworl prepared – In fact too p jobs and housing num 'exceptional circumstal	k (February 2019) (NP positive, leading to ove bers are over estimate nces;	er-planning for jobs and hous	ing. e is possible, these combined

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.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St.Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land.

There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling. Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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 the oral part of the examination? (the hearings	on; do you consider it necessary to participate at in public)
No, I do not 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.

Representor Details

Web Reference Number	WF0011	
Type of Submission	Web submission	
Full Name	Mrs Lorraine Atherton	
Organisation		
Address	40 Junction Road Rainford St Helens WA11 8SJ	
	Wa11 8SJ	
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	Rainford local plan	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment Habitats Regulation Assessment	1	
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.

Dear all,

The consultation on the Local Plan - extended because of a council error - finally closes on Monday 13th May 2019. If you haven't commented yet, please do so. There is still plenty of time to have your say.

Here are some points we recommend making on the plan overall:

- 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 not as high as set out in the Local Plan
- There are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target housing figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure

01

• The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

01

Rainford Specific points (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 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 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.
- 7. Please set out modification(s) you consider are necessary Please note above my point.
- 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	5/9/2019 11:56:42 AM

01



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.

WAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: KiM	First name:
Last Name: 477 WOOD	Last Name:
Organisation/company:	Organisation/company:
Address: TUNSTALLS FARM	Address:
Postcode: WA9 (Q)	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 13.5 2019
lease be aware that anonymous forms cannomments to be considered you MUST included.	
Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	ne Plan for examination, publication of the
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferraddress is provided, we will contact you by	

RETURN DETAILS

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post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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Ground Floor Reception, St. Helens Town Hall (open Monday-

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3. To wi	nich par	t of the Loca	l Plan (does this r	eprese	ntation relate?		
Policy	·	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
docume		ts (please na	ame					
part/sec		elevant						
parivsec	tion)							
4. Do yo	ou consi	der the St He	elens E e for exi	lorough Lo	cal Pla	n 2020-2035 is: Compliance and t	he Tesis	of Soundness
Legally	Complia	ant?	Ye			No		
Sound?			Ye	es 🗆		No		- -
		he Duty to	Ye	es 🗆		No		, <u></u>
Coopera								
Please tic	k as appr	ropriate						
Please re	ead the (Guidance note	Plan is For exp	unsound, Danations o	is it be of the T	cause it is not: ests of Soundness		
Positivel		red?		<u></u>				
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or fails to	<u>o compl</u> sh to <u>su</u>	<u>y with the du</u>	<u>ty to co</u> al com	operate:	Please	be as precise as	possible	ant or is unsound ease also use this
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						Please continue o	on a separ	ate 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 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	compliant or so relates to sound incapable of mo the Local Plan le	und, having regard to th Iness (NB please note the dification at examination egally compliant or sour	e matter y nat any no n). You wil nd. It will b	necessary to make the Lo ou have identified at 6. al n-compliance with the du I need to say why this mo e helpful if you are able t Please be as precise as po	oove where this ity to cooperate is odification will make to put forward your
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 7 MAR 2019

(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)	2. Your Agent's Details (if applicable)
	Title:
First Name: THOMAS KESING	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 5 FISTRAL DRIVE	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 7-3-19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Vould you like to be kept updated of future stage namely submission of the Plan for examination, pudoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035 ablication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred method will contact you by your postal address.	nod of communication. If no email address is provided

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Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)				
	Title:				
First Name: MARGARET	First name:				
	Last Name:				
	Organisation/company:				
Address: 15 FISTRAL DR WINDLE	Address:				
	Postcode:				
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Please be aware that anonymous forms cannot considered you MUST include your details abo	t be accepted and that in order for your comments to be ove.				
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and				
Yes (via email)	☐ No				
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,				

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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 matthe Local Plan legally compliant or sound. It will be helpful if you are able to put forward you 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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	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination				
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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WAY 2019

PART A - YOUR DETAILS

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Organisation/company:
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Postcode:
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Mobile No:
Email:
ite: 154 MAY 2019

Would you like to be kept updated of ful Plan 2020-2035? (namely submission of the	ne Plan for exami	e St Helens Boroug nation, publication o	gh Local f the
Inspector's recommendations and adoption Yes (Via Email) PREF POST	No [
Please note - e-mail is the Council's prefer address is provided, we will contact you by	red method of co your postal addr	mmunication. If no e	e-mail



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1 3 MAY 2019

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Title: mR	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company: RETIRED	Organisation/company:
Address: 2. 9BERIS GARDEN NEWBORD ST HELENS. MERSEYSIDE	Address:
Postcode: WAG4FY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date:
Please be aware that anonymous forms cannot be comments to be considered you MUST include you	our details above.
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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 170, HIGHER LAWE RAINFORP ST HELENC Postcode: WALL & BH	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/2019.

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.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🗹 (Via Email)	No 🗌
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Thank you for taking the time to compl	

Comments on Local Plan proposal

Planning applications for the greenfield sites should only be accepted in **exceptional circumstances** (as per government policy), whilst there is capacity on brownfield sites

The land required for future housing in the Local plan of 486 house per year is based on assumed growth of the boroughs population however the office for national statistics indicates Rainsford needs 383 houses per year

St Helens council commissioned GI Hearn to produce a Strategic Housing Market Assessment (SHMA) which has just been published in January 2019 . The results bear out the office of national statistics figures. The figures being 391 houses per annum which increased to 398 per annum when taking into account the 2017 mid year estimates of the Sub-National Population Projections

The available brownfield sites in St Helens could accommodate circa 5800 houses.

The latest SHMA report indicates a requirement for 5970 houses over the next 15 years (15*398) Only 170 more than that available on brownfield sites.

This is sufficient for the next 14.57 years at 398 units per year or just under 12 years at the local plans inflated figure of 486.

The local plan envisages 7000 potential new jobs in the next 15 years and proposes 7290 new homes, more than 1 new home for each potential new job

I appreciate that the GL Hearns report was not available when the Local Plan was published however from the above it is clear that the Local Plan has overestimated the housing requirements.

Complies with duty to co-operate

West Lancashire one of the adjacent authorities has plans for a garden village bordering the Rainsford bypass (A570) and roughly 1 mile from the Rainsford border. When I raised the subject of cooperation between the authorities regarding housing needs with one of the St Helens planning officers he responded that those plans had nothing to do with them and that they took care of their own needs it was up to West Lancs to take care of their own requirements. Considering the size of the West Lancashire proposal plus LPSD 8HA in Rainsford this insular attitude displays a total disregard for the housing needs in the wider area and use of greenbelt to fulfil that need.

The two authorities should be cooperating to ensure best possible use of available land and avoid urban sprawl

Safeguarded land

The plan is to cover the period from 2020 to 2035 as further reviews will take place before then there is no need to assign parcels of land to be removed from the greenbelt as part of this plan. Reviews in 5 & 10 years' time will have a clearer picture of future requirements.

LPSD 8HA

This parcel of land should not be removed from the green belt

From the figures in the latest Strategic Housing Market Assessment it is clear that the release of green field land is not required on the scale published in the Local Plan

Grade 1 Agricultural land used for much needed crops especially in view of an impending BREXIT

Main issues

It is not suitable as a residential area as the land is immediately adjacent to the industrial site with related **noise** and **smell** problems

Drainage – The existing drainage system requires an upgrade to ensure there are no problems with flooding or sewage. The south east boundary of this field floods. No safeguards proposed to ensure that this is carried out.

Schools — Whilst there are a few places at primaries available the schools could not cope with the increase in children from the additional housing

Doctors -- insufficient to meet the increased needs (current wait for an appointment just shy of two weeks)

Congestion – there is insufficient parking in the village centre at present the increased population would exacerbate this.

Traffic - The upgrade to Windle Island is based on current volumes

NO guarantees of supporting infrastructure

LPSD 9EA

This parcel of land should not be removed from the green belt

The parcel of land is in an area that is subject to flooding and a part of which was rejected by the government inspector as a potential sub regional waste management site in 2012

There is no need for green belt land to be used for industrial use as there are many derelict industrial sites in St Helens which could be developed and at the same time enhance the town.

There are currently unused units on the Rainsford industrial estate and hundreds of thousands of square feet of vacant warehouse/industrial space available 10 minutes away on the A580

(2)





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

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1 2 MAR 2019

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Title: MRS	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 170 HIGHER LANE RAINFORD STHELENS Postcode: WALL & BH	Address: Postcode: Tel No:
	Mobile No:
	Email:
Signature:	Email: Date: 5 3 2019

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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.

. To which part of the Local F	Plan does this representat	tion relate?	731
olicy Paragraph / diagram / table	Policies Su Map Ar	ustainability praisal/ rategic Habitats Regulation Assessment	
		nvironmental ssessment	
Other documents (please name document and relevant	ne		
part/section)			
Do you consider the St Hele	ens Borough Local Plan 2 for explanations of Legal Co	2020-2035 is: Impliance and the Tests of Soundness	
egally Compliant?	Yes 🗆	No LJ	v
Sound?	Yes 🗆	No 🗆	
Complies with the Duty to	Yes 🗆	No 🗆	
Cooperate			
Please tick as appropriate			
5. If you consider the Local Pl	an is unsound is it becau	se it is not:	7
Please read the Guidance note t	or explanations of the Tests	of Soundness	ALL
Positively Prepared?			
Justified?			
Effective?			
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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.

The proposed plans should be removed from remain Greenbelt. LPSD 811A & GEA

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 3 0 APR 2019 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
• • •	Title:
	First name:
Last Name: Bacon	Last Name:
	Organisation/company:
	Address:
ST Helens Merseyside	
Postcode: LAG 3 PA	Postcode:
Tel No:	Tel No:
Mobile_No	Mobile No:
	Email:
Signature:	Date: 18-4-2019

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)

П	Yes (via email)]	Ν	(
	1ES IVIA EIIIAIII	, ,	, ,	٧

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 Monday 13th May 2019

post to: Local Plan

St.Helens Council

Town Hall

WA10 1HP

Victoria Square St Helens

or by hand delivery to:

Ground Floor Reception

St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

by:

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

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Telephone: 01744 676190

NEXT STEPS

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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.

1 2 MAR 2019



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

Ref: LPSD

(For official use only)

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This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

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

Title: ML	Title:
First Name: KEVIN	First name:
Last Name: BAILEY	Last Name:
	Organisation/company:
	Address:
ST HELENS	
Postcode: WAII OSR	Postcode:
Tel No:	Tel No:
Mobile N	Mobile No:
Email:	Email:
Signature:	Date: 5/3/19
considered you MUST include your details abo	
	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

RETURN DETAILS

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

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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.

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Other documents (ple document and releva)		
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Sound?			Yes No	
Complies with the Du	uty to Cooperat	te 🗌	Yes No	
Please tick as approp	priate			
Positively Prepared?				
Justified?	onal Policy?			
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Please continue on a separate sheet if necessary
tation and suggested modification, as there e further representations based on the original
at the request of the Inspector, based on matters
n; do you consider it necessary to participate at in public)
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.

LPA -05 SITE - ZHA

Box 6 Continuation

Not justified. The Council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981.

Where are all the extra people coming from?

Housing in this area isit sustainable because of a lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of a lack of facilities.

The access to the site is inaclequate, a left in/left out from the East Lanes HS80 init safe and the proposal for a junction at Livepool Rd. + Vicarage Rd Would put additional traffic on an already overstretched high ways system. There would be problems of 'Tat-remning' through the proposed development.

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.

. Io which part	of the Local Pla	an does this rep	resentation	relate?	
olicy A 4 Es	Paragraph/ diagram table	Policies Map	App Stra Envi	tainability braisal/ itegic ironmental essment	Habitats Regulations Assessment
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Sound?] Yes	No	
Complies with th	e Duty to Coope	rate] Yes	No No	
Please tick as ap	propriate				
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re	anoval of	of the Gr	embelt.	
			Please continue on	a separate sheet if necessar
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reser er thi d issu	ntation at the publication is stage, further subues he/she identifies	ion stage. missions will be one for examination. seeking a modification? (the hearing participate	y at the request of the Inspecto	or, based on matters
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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

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: MR	Title:		
First Name: CHARLES	First name:		
Last Name: 3AILE 7	Last Name:		
Organisation/company:	Organisation/company:		
Address: 336 GAREWOOD ROAD	Address:		
Postcode: Wall a TV	Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:			
Signature:	Date: 11-5-2019		

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.

Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)	A LANGE
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 Manager 13⁷ # 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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Telephone:

01744 676190

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Policies Map	Sustainability Appraisal/	Habitats Regulation Assessment
	el magnes	2
Borough Local F		Tests of Soundness
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Yes	No ⊠	
Yes	No □	
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Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Garswood Road/I GILLINGE Road is not adequate due to narrow road and lack of pavements. Also, the amount or trainc already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition . there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

/ support the above.



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.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

/ support the above.

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 no document and relevant part/section)	ame		
4. Do you consider the St H Please read the Guidance not	e for explanations of Le		Tests of Soundness
Legally Compliant?	Yes 🖾	No C	
Sound?	Yes	No ⊠	
Complies with the Duty to Cooperate	Yes 🗆	No C	
Please tick as appropriate			
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Please tick as appropriate 5. If you consider the Local Please read the Guidance not			
5. If you consider the Local Please read the Guidance not Positively Prepared?	e for explanations of th		

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 <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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Support the above.



Please continue on a separate sheet if necessary

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13 upport the above.

	Please continue on a separate sheet if necess
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If your representation is seeking a modification	
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Representor Details

Web Reference Number	WF0119
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13 Peebles Close
	Garswood
	Wigan
	Lancs WN4 0SP
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 and 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.

The council has already granted planning permission in the Greenbelt in respect of Site 2EA, Florida Farm North. An absolute blot on one of the beautiful areas of the borough and all involved should be ashamed of themselves!

Greenbelt has many purposes, one of which is to encourage the recycling of derelict land. This must take place as a priority and preserve the Greenbelt.

The council must be put to strict proof of the population estimates. Figures have fallen consistently since 1981, where is the increase in people coming from?

The risk of flooding in Clipsley Brook will increase if this development is allowed.

The high volumes of predicted increase in traffic will add to the already over capacity on the roads in the area. Any improvements necessary must be paid for by the developer and not the Council Tax payers.

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 11:08:45 PM

Representor Details

Web Reference Number	WF0121
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13 Peebles Close
	Garswood
	Wigan
	Lancs WN4 0SP
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 - Site 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?	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.

The greenbelt must be preserved. The derelict land must be recycled and brownfield land used as a priority. Greenbelt preserves wildlife and are necessary in preventing urban sprawl.

The council must prove their population estimates. It has fallen steadily since 1981 yet they estimate a huge increase. Greenbelt cannot be lost to a lie.

Access to the site is unsuitable and the roads around the area are already overstretched.

Flooding is already an issue at Clipsley Brook and this proposal would exacerbate the problem.

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 10:30:19 PM

Representor Details

Web Reference Number	WF0141
Type of Submission	Web submission
Full Name	Miss Emily Bailey
Organisation	
Address	13 Peebles Close
	Garswood
	Wigan
	Lancs WN4 0SP
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 - 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?	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.

This Greenbelt must not be released for housing at any time. The recycling of derelict land must be the primary objective of this plan and protect the purposes of Greenbelt.

The wildlife and its habitats must be protected at all costs.

The council state that there is an expected increase in population, so needing the extra housing. The council must be put to strict proof of these estimates; the population of St Helens has declined steadily since 1981 - where are all these extra people coming from? We cannot lose this precious Greenbelt on a lie.

The infrastructure of Garswood is unsuitable. The country roads can't take the additional vehicles, either during building works or once the houses are occupied. Access to the site from Billinge Road or Leyland Green Road would be inadequate and if there are any additional necessary highways works then this must be funded by the developer and not the Council Tax payers.

The infrastructure is inadequate for increased housing. The doctors surgery already has long wait times. Local schools are inadequate for a large increase in numbers.

There is no statement of common ground with neighbouring authorities, Wigan infrastructure will be severely impacted, housing, education, roads and medical facilities.

- * The adjacent playing fields MUST NOT be removed from Greenbelt. They are a precious amenity, land donated for the benefit of Garswood residents. The council haven't given a good reason for the removal and this cannot be allowed.
- 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 8:37:08 PM
1100000100000000	0, ==, =0=0 0.07.00

(1)-LPAOS (2) LPAOS, IHA (3)-Statement of Common Ground

Representor Details

Web Reference Number	WF0163
Type of Submission	Web submission
Full Name	Miss Emily Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan Lancs WN4 0SP
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?

LPA 05 - Site 1HA

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.

*The area is unsuitable for housing: the roads are narrow country lanes, the access from either Smock Lane or Billinge Road is inadequate and safety is a real concern, both during building works and once the houses are occupied. Public transport is poor, bus routes are limited and the railway station is wholly inadequate. There is no disabled access to the Liverpool bound line, no parking and nowhere to build a car park.

*The Greenbelt should be used as a last resort. One of the purposes of Greenbelt is to encourage recycling of derelict land and the council haven't taken into account the derelict and brownfield land in the borough that will enable building but protect precious Greenbelt.

*The wildlife in Garswood must be protected. We have bats, small animals, ducks and wild birds that will lose their habitat and disappear, never to return.

*The council must prove where the estimates of growth in population have come from. As the population has steadily decreased since 1981, it is highly unlikely that there will suddenly be a rise and the evidence must be shown. There is too much at stake for Greenbelt to be lost to speculation — and lies.

	quate; the doctors surgery already has long wait times and more. The local primary schools wouldn't be able to cope with a large
influx of children.	- The least printer, serious western the district to cope with a large
* There is no statement of common	ground with neighbouring authorities.
* Primary and high schools in Wigar	n would be impacted.

- 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 7:37:39 PM	X
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Representor Details

Web Reference Number	WF0167
Type of Submission	Web submission
Full Name	Mr Neil Bailey
Organisation	
Address	13 Peebles Close
	Garswood
	Wigan WN4 OSP
Agent Details	A CANADA CAN

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-Site1HS
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

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 Council should be put to strict proof of its population estimates. The population of St Helens has been in steady decline since 1981 and now they think it's suddenly going to improve. Where are all these people going to come from?

The Greenbelt must be protected at all costs and the removal of this Greenbelt for immediate and future housing must be a last resort. The Council has taken the easy option of removing Greenbelt rather than the most environmentally friendly option of using brownfield and derelict land. This option must be utilised first. Once the Greenbelt is sold to developers it will never be replaced. One of the purposes of Greenbelt is to encourage the recycling of derelict land and this must be observed.

Garswood has a large amount of wildlife - bats, wild birds and small animals that will lose their habitat and never return.

The infrastructure in Garswood is not sustainable. The narrow country roads couldn't take the extra traffic, either during building works or once the houses are built. The site access to either Billinge Road or Smock Lane would be inadequate and any necessary highway works must be funded by the developer and not the Council Tax payers.

There is a lack of doctors surgeries - the current one already has long waiting times.

0

The Council have admitted that there isn't a village centre but seem intent on building more houses without infrastructure. Garswood is unsuitable as the commuter area they appear to want. The railway station has NO parking and nowhere to put any and there is no disabled or pram access to the station platforms. Residents are forced to use their cars and if they want to use public transport the bus routes are few and the railway station not fit for purpose.

The local schools wouldn't be able to cope with an influx of children.

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to be used for children in Garswood, these plans would appear to show that there is no statement of common ground with the neighbouring authorities.

* The adjacent playing fields are also planned to be removed from the Greenbelt. This mustn't be allowed to happen as it is one of the very few amenities that young people in the area have. If it isn't planned for housing, and the council line is that it isn't, then it MUST stay as Greenbelt. As a professional football coach I know of the benefits to young and old alike of all sports and this land must be protected.

7. Please set out modification(s) you consider are necessary

Delete this land - and the playing field - 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:

A COLUMN TO A COLU	
Response Date	3/12/2019 7:03:25 PM

Representor Details

Web Reference Number	WF0242
Type of Submission	Web submission
Full Name	Mr Neil Bailey
Organisation	
Address	13, Peebles Close
	Garswood
	Wigan
	Lancs WN4 0SP
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?	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.

The Greenbelt must be preserved and only released after all other options of derelict and brownfield sites have been explored which certainly doesn't appear to be the case.

The wildlife around Garswood; bats, wild birds, ducks and geese would disappear and never return. This land must be preserved at all costs.

The Council say that this land is needed for housing because of the expected rise in population that is expected. As the population has declined steadily since 1981, the council must prove this statement and where these people are coming from. We cannot lose precious Greenbelt for the sake of a wish list.

The infrastructure in Garswood is unsuitable for this high number of planned housing. The roads are narrow, winding country roads, the bus service barely exists and the rail station has very few parking spaces and no room to build any. There is no disabled or pram access either so is unsuitable for the 'commuter' area the council appear to have in mind.

The doctors surgery already has long wait times. There are few amenities for young people. Any necessary improvements that are needed, especially to the roads, must be funded by the developer and not the council tax payers.

There is no statement of common ground with neighbouring authorities. This plan will have a massive impact on Wigan Council primary and high schools as well as GP surgeries.

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	3/10/2019 6:55:09 PM
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Representor Details

Web Reference Number	WF0247
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13, Peebles Close
	Garswood
	Wigan
	Lancs WN4 0SP
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	
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.

The Greenbelt shouldn't be the first, easy, choice to release for housing. It is universally accepted that protecting Greenbelt land is a sign of good, positive planning and this plan is the opposite. There are approximately 6,000 properties that could be built in the borough on derelict and brownfield sites and these must be looked at first. It is vital that we preserve Greenbelt and once it's gone for housing there's no turning back.

The wildlife in Garswood is never seen in the urban sprawl up the road in Winstanley and we are fortunate to have varieties of bats, wild birds, and small animals here and they must be protected. The Council have stated that the population 'is expected to grow' and they need to build these houses. They must prove not only the figures but how they have been reached as the population in St Helens has declined every year since 1981. Where are all these people needing homes expected to come from? We must see the evidence. I'm not a 'NIMBY' but don't wish to lose precious Greenbelt and associated wildlife benefits because the Council have a wish list of a higher population, that cannot happen.

This area isn't suitable for the planned housing. The roads are narrow country lanes with already too many cars using the. The doctors surgery has long waiting times and schools are almost at capacity, if not full. Where are these children going to go to school.

St Helens Council have stated that 'Garswood has some shops and services.....no distinct central shopping/service centre...it is large enough to form a key settlement.' There are few amenities in the area and the houses that are planned will force people into their cars. The rail service isn't suitable for commuters, it's a slow train to Liverpool and you need to change trains (and station!) at Wigan to get to Manchester. The train station has no parking and no space to create one. There is no disabled or pram access or lift so is not suitable for the large numbers that the Council intend to potentially use the station.

The buses are practically non existent so it would be rail or car. As the train station and roads are unsuitable, the Plan should be rejected. Access to the site from either Leyland Green Road or Billinge Road would be inadequate on the narrow country roads. Should this plan go ahead, the developers must fund any necessary improvements, not the Council Tax payers.

The Council state that they have worked in conjunction with neighbouring authorities. They must prove this as Wigan will be adversely affected with schools and GP surgeries needing expanding as it is so close to the boundary and speaking from personal experience most of Garswood use Wigan amenities for convenience. There is already a formal agreement in place for education and it's isn't just the local primary schools in Bryn that will be affected but the 3 high schools in Ashton-in-Makerfield that will be impacted.

The playing fields adjacent to LPA06-Site 1HS are also in the plan to be removed from Greenbelt. The planners have tried to say that there are no plans to build and there's no point having 'an island' of Greenbelt. If there's no intention of building in the future, why remove it from the Greenbelt? This MUST continue to be protected as it is one of the precious few amenities the young people of Garswood have, greed cannot be allowed to prevail.

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	3/10/2019 6:05:50 PM
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Representor Details

Web Reference Number	WF0435
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13, Peebles Close
	Garswood
	Wigan
	WN4 0SP
Agent Details	N/A

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?

or to triner part of the zoour fair account representation related		
Policy	LPA 05 - SITE 1 HA	
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.

- *The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.
- *One of the purposes of Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.
- * The local playing fields have also been removed from the Greenbelt. There is very little for young people to do in the area and if thiey were to be removed in the future, and there are no guarantees that they won't be if they included in the Plan, then this would be disastrous, not only for young people already living here but for the large numbers predicted to be moving here.
- *The Plan is not justified. The figures put forward by the Council don't add up and they need to provide evidence to back up their population estimates. They have estimated a huge increase in the local population to justify Greenbelt being released for housing yet the population of St Helens has been in decline since 1981.
- *Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and an inaccessible railway station. There is inadequate parking around the station and nowhere to build a car park. The use of cars is being encouraged because of the lack of facilities.

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	2/27/2019 9:57:45 PM
Response Date	2,27,2013 3.37.131.11

^{*}The access to the sites on either Billinge Road or Garswood Road would be wholly 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

EL0209

D-LPAO6 2)-APRENDIX 7

LPSD comments Cllr D Baines

planningpolicy@sthelens.gov.uk

13/03/2019 15:35



1 Attachment



LPSD comments - Cllr David Baines.pdf

Hello,

Please find attached my comments regarding the LPSD.

Best wishes,

David

Councillor David Baines Ward Councillor for Windle, St Helens

<u>Councillor David Baines, Ward Councillor for Windle</u> Local Plan Submission Draft

On behalf of residents I wish to make the following comments regarding the Local Plan Submission Draft (LPSD) site reference 8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.

Residents who live near the site proposed as safeguarded land have raised a series of concerns about this. Residents have expressed concerns about the methodology behind the housing demand target; the methodology behind the scoring system used for the Greenbelt Review and choosing sites; removal of the land from the green belt; impact on wildlife; the impact on residents' health and quality of life; and increased noise and air pollution. In addition, residents have the following specific concerns about this site:

- Impact on **traffic and roads**, particularly those areas already often heavily congested such as Windle Island and the East Lancashire Road, Bleak Hill Road, and Rainford Road;
- Impact on local schools, already fully or over-subscribed and being expanded to cope with the growth in pupil need already expected without the potential addition of 1000+ homes nearby;
- Impact on health services: there is no GP service or health centre in Windle ward at all. The nearest services are in Eccleston or the town centre. Residents report it can already be incredibly difficult to get appointments when needed. There is no health service within reasonable walking distance from current homes, let alone the proposed site;
- Lack of existing amenities: there are no convenience stores within easy walking distance of
 the proposed site with the exception of the Tesco Express at Windle Island, to which we do
 not want to be directing even more traffic, and a garage across the 4 lanes of traffic on the
 East Lancashire Road. Residents believe that neither location is convenient for this proposed
 site of 1000+ homes.

In its assessment of the site in LPSD Appendix 7: Site Profiles – Safeguarded Employment and Housing Sites, there is an acknowledgement of the concerns about the impact on highways, which I welcome, and several recommendations are made to mitigate the impact on existing roads. Residents have expressed scepticism that these recommendations would go far enough to alleviating any negative impact.

In a further recommendation, the assessment in Appendix 7 states: "Financial contributions or the provision of on-site infrastructure for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage."

Like the other recommendations regarding highways, this is welcome, but residents would like an additional statement that provision for on-site amenities such as convenience stores or even health provision may be required with any future development, for the benefit of both the new and existing local residents.

I support the LPSD but I understand the concerns raised by residents regarding site 8HS and on their behalf I would ask that in further stages of this process full consideration continues to be given regarding the impact on highways, schools, health services and amenities, and the work necessary to protect and improve these essential features of our community.

Councillor David Baines





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).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name:	First name:
Last Name: BAKER	Last Name:
Organisation/company:	Organisation/company:
Address: bb EVERGREEN WAY	Address:
BOLD	
Postcode: WA 9 HZS	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 23./4/19

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.	



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 <u>www.sthelens.gov.uk/localplan</u>.

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

1 3 MAY 2018

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR_	Title:
First Name: ドルコンドイリ	First name:
Last Name: Last Name: LAKER	Last Name:
Organisation/company:	Organisation/company:
Address: 66 EVERGRIED WAY	Address:
Postcode: 4A9 4ZS	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 23/4/19
lease be aware that anonymous forms canromments to be considered you MUST include	not be accepted and that in order for your details above.
Would you like to be kept updated of fut Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's prefer address is provided, we will contact you by	red method of communication. If no e-mail your postal address.

Representor I	Detail	ls
---------------	--------	----

Web Reference Number	WF0219
Type of Submission	Web submission
Full Name	Mrs Judith Baker
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	LPA 052HA	
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 o	r
fails to comply with the duty to cooperate. Please be as concise as possible.	

, , , , , , , , , , , , , , , , , , , ,
I have lived in Haydock all my life apart from a short period travelling. The main reason I came back
was to belong to a small community, I chose a house to live near greenbelt . I like
to see the wildlife and have keenly watched woodpeckers, Jays, finches, rabbits, fox's mice, voles,
newts, frogs and stoats to name but a few of the creatures near my home. I also wanted to live near
a greenbelt area to raise in cleaner air. She has since been to and finds the air in
this area to be detrimental to her therefore more buildings would mean contaminating the
air more. St.Helens has the highest rate for suicide in the UK. To
increase our population without increasing services would also increase the rates of suicide.
to utilize nature using mindfulness, by removing our greenbelt and increasing the
population would again be detrimental.
I among many others in Haydock find it difficult to get a GP appointment, flooding the area with
additional people will make this even more difficult. I had to take to school in
Garswood as there were too few places in Haydock, schools have closed so how are
we to find places for youngsters?
Getting out of Liverpool Road by car is already a nightmare, its difficult to join Vicarage road as it is

Getting out of Liverpool Road by car is already a nightmare, its difficult to join Vicarage road as it is each morning, then the queue down Stanley Bank way to work, additional cars are not whats needed here. Also, additional junction from the East Lancashire road will be dangerous as well as

causing tailbacks of traffic, this may cause people to take short cuts through any new housing development. The flooding each year down Blackbrook also has an impact on my work journey. If more buildings were added to the warehouses and water added to the Clipsley brook we would surely see a surplus of water.

I feel very strongly about this proposed development, the council sold us down the river with the warehouses, please re think the building of additional houses, we have enough vacant houses in the St. Helens area.

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 6:40:33 PM
Response Date	3/11/2013 0.40.33 FW



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

Ref: LPSD

0 1 MAR 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.

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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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: USS	Title:
First Name:	First name:
Last Name: Ball	Last Name:
Organisation/company: Res Work	Organisation/company:
Address: 15 Mossbooten Fld Rainford Postcode: WALL 800	Address: Postcode:
Posicode. WHILL OWN	Tel No:
	Mobile No:
	Email:
Signature:	Date: 26 2 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.

	odated of future stages of the St Helens Borough Local omission of the Plan for examination, publication of the and adoption of the Plan
Yes Via Email)	No
	uncil's preferred method of communication. If no e-mail ontact you by your postal address.

RETURN DETAILS

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St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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FURTHER INFORMATION

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NEXT STEPS

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DATA PROTECTION

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	mon part of the Local File	an does this representation re	elate!
Policy	Paragraph / diagram / table	Policies Sustain Apprais Strategi Environ Assessi	Regulation ic Assessment mental ment
	ocuments (please name ent and relevant ction)	Payford Green od	n ad designature of the for housing development
		ns Borough Local Plan 2020-2	2035 is: nce and the Tests of Soundness
	Compliant?	Yes 🗆	No 🔽
Sound?		Yes 🗆	Now
	es with the Duty to	Yes 🗆	No U
Cooper	. 이사이네요요 - 보니에서 아니아 아이에 가지면 다른데 아이에	. 55	y
	ck as appropriate		
	or Foreign		
5. If you	consider the Local Plan	n is <u>unsound</u> , is it because it i	s not:
		explanations of the Tests of So	
	ly Prepared?		
Justified			
Effective		N	
	ent with National Policy?		
		u consider the Local Plan is rocooperate. Please be as pr	not legally compliant or is unsound recise as possible.
or fails 1	to comply with the duty t	o cooperate. Please be as pr	
or fails f	to comply with the duty t	o cooperate. Please be as pr	recise as possible.
or fails to	ish to support the legal of set out your comments	compliance or soundness of the agricultural	the Local Plan, please also use this
or fails to so to	ish to support the legal of set out your comments	compliance or soundness of the agricultural	the Local Plan, please also use this local Grade 1 ees al employeed as a rural ruraje
or fails to so to	ish to support the legal of set out your comments or local from the legal of the set out your comments or local from the legal of the set out your comments	compliance or soundness of the agricultural englished in character and agricultural englished in case of the case	the Local Plan, please also use this land Grade I es ad employend as a rural rurage Tarkist School
or fails to so to	to comply with the duty to the comply with the legal of set out your comments. The of Process of the control o	compliance or soundness of the agricultural erun employed eping in chandles transition to transition are accepted in accepted.	the Local Plan, please also use this lard Grade I es ad employed as a rural ruraje Torbist, School cangestian
or fails to the second of fails to the second of the secon	to comply with the duty to the comply with the legal of set out your comments. The of Process of the control o	compliance or soundness of the agricultural	the Local Plan, please also use this lard Grade I es al employer g a rural rurage [Jarlist, School cargostran

7. Please set out what modification(s) you consider compliant or sound, having regard to the matter you relates to soundness (NB please note that any nor incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text. Pl	ou have identified at 6. above where this n-compliance with the duty to cooperate is need to say why this modification will make helpful if you are able to put forward your
Themoval of land designed by use	rated to be
Greenbelt Land Gre	ide 1, Improstructure
Uneble to cope as	associated hazardo
modification, as there will not normally be a subserepresentations based on the original representation of matters and issues he/she identifies for example. 8. If your representation is seeking a modification;	dy the representation and suggested equent opportunity to make further on at the publication stage. The stage of the Inspector, based amination. The stage of the Inspector of
Mo, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the e this to be necessary:	examination, please outline why you consider

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Council

D-LPAOS Q- Skatement of Common Ground

Ref: LPSD

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Organisation/company:	Organisation/company:
Postcode: WNLEXS	Address: Postcode:
THE RESERVE OF THE PARTY OF THE	Tel No:
	Mobile No:
	Email:
Signature:	Date:

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Inspector's recommendations and ac	on of the Plan for examination, publication of the Plan for examination, publication of the plan)
Yes (Via Email)	No 🗌

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3. To which part of the Loca	Policies	Sustainability	Habitats	
LPACS I HA Paragraph / diagram / table	Map 1 HA	Appraisal/ Strategic Environmental Assessment	Regulation Assessment	
Other documents (please na document and relevant part/section)	ame			
4. Do you consider the St H Please read the Guidance not	elens Borough Local of for explanations of L	Plan 2020-2035 is:	Tests of Soundness	
Legally Compliant?	Yes 🔼	No C		
Sound?	Yes 🗆	No K		
Complies with the Duty to Cooperate	Yes 🗆	No &	No 🗷	
Please tick as appropriate 5. If you consider the Local			ere i di nasara bake atake ye kebaba barin	
Please read the Guidance not				
Positively Prepared?	П		X TAN TRANSPORT MANUFACTURE SEL	
Justified?	B		2000	
Effective?	M			
Consistent with National Pol	icy?			
6. Please give details of why or fails to comply with the di	ity to cooperate. Ple	ase be as precise as po	ssible:	
If you wish to support the let box to set out your commen	gal compliance or so ts	undness of the Local Pl	an, please also use thi	
			mates, as the	

sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

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Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road and Garswood Road is not adequate due to narrow road and lack of pavernents. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

N.B. The number of children with asthma is increasing due to pollution and

AH!

Please continue on a separate sheet if necessary

7(2)

6.PACS

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 remessantation is seaking a producation Half-bent of the extantication? (the heatings in	:do you consider it necessary to participate at oublic)
×	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

this to be necessar	dicipale al the oral part of the examinable	
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		<u>, l</u>

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

Please keep a copy for future reference.

(1)-LPAO6 (2)-Statement of Common Ground





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Ref: LPSD

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First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 48 % KARI WOOD RO	Address:
Postcode: WN4 OXJ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
Signature:	
mments to be considered you MUST incli	nnot be accepted and that in order for your ude your details above.
Plan 2020-2035? (namely submission of Inspector's recommendations and adoptic	the Plan for examination, publication of the on of the Plan)
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)			
4. Do you consider the St Helens Please read the Guidance note for o	Borough Local	Plan 2020-2035 is:	Tests of Soundness
Legally Compliant?	Yes 🗶	No E	
Logary Compress	Yes 🗆	Nox	
		111 9	
Compiled mar are any re	Yes 🗆	No 🗷	•
Cooperate	Yes ⊔	No E	•
Cooperate Please tick as appropriate 5. If you consider the Local Plan Please read the Guidance note for Positively Prepared?	is unsound; is il	because it is not	
Cooperate Please tick as appropriate 5. If you consider the Local Plan Please read the Guidance note for	is unsound, is i explanations of th	because it is not	

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

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Please continue on a separate sheet if necessary

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

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HOSI YAMEI

PART A - YOUR DETAILS

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

Title: MR First Name: GARETH Last Name: BALC Organisation/company: Address: 66 Easington Road St. Helens Postcode: WA9 5LH Tel No: Mobile No:	(we will correspond via your agent) Fitle: First name: Last Name: Organisation/company: Address: Postcode: Fel No: Mobile No:
Last Name: BALC Organisation/company: Address: 66 Easington Read St. Helens Postcode: WA9 5LH Tel No: Mobile No:	Last Name: Drganisation/company: Address: Postcode: Fel No: Mobile No:
Organisation/company: Address: 66 Easington Road St. Helens Postcode: WA9 5LH Tel No: Mobile No:	Organisation/company: Address: Postcode: Tel No: Mobile No:
Address: 66 Easington Road St. Helens Postcode: WA9 5LH Tel No: The Mobile No: No. 1	Address: Postcode: Fel No: Mobile No:
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ease be aware that anonymous forms cannot be a mments to be considered you MUST include your	ccepted and that in order for your details above.
Would you like to be kept updated of future sta Plan 2020-2035? (namely submission of the Plan	for examination, publication of the
nspector's recommendations and adoption of the res (V) (Via Email)	
,	o []
Please note - e-mail is the Council's preferred met address is provided, we will contact you by your po	hod of communication. If no e-mail ostal address.

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495

1 2 MAR 2019

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Me.	Title:
Title: MR. First Name: Sames: Last Name: RacmeR.	First name:
Last Name: Bac well.	Last Name:
Organisation/company:	Organisation/company:
Address: 53 common have.	Address: Postcode:
Posicode: CON +	el No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 5-3-19.

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 upda Plan 2020-2035? (namely subm Inspector's recommendations ar	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the adoption of the Plan).
Yes [(Via Email)	No 🗹
Please note - e-mail is the Coun address is provided, we will con	cil's preferred method of communication. If no e-mail
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this form before you complete it			
3. To which part of the Local Pla	an does this repre	esentation 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 Heler Please read the Guidance note for	ns Borough Local rexplanations of L	egal Compliance and the	Tests of Soundness
Legally Compliant?	Yes	No L	
Sound?	Yes 🗆	No C	
Complies with the Duty to Cooperate	Yes 🗆	No C	
Please tick as appropriate			
5. If you consider the Local Pla Please read the Guidance note fo Positively Prepared? Justified? Effective? Consistent with National Policy	r explanations of the	t because it is not: ne Tests of Soundness	
6. Please give details of why your fails to comply with the duty If you wish to support the legal box to set out your comments	to cooperate. Ple	ase be as precise as p	iossible.
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Brownfield Si	te Noi	د دار ال	
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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.

Detete propose of LAND form

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 r	nedification; do you consider it necessary to participate at
the trail 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

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.

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 par	t of the Local Plan	does this repre	contotion value 2		
Policy HS -ROD	Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
Other document document and re	s (please name elevant part/section)				
4. Do you conside Please read the	der the St Helens E e Guidance note for	Sorough Local Percentage of explanations of	lan 2020-2035 is: Legal Compliance and th	e Tests of Soundness	
egally Compliar			es 11 No		
Sound?		☐ Ye	es PNo		
Complies with the	e Duty to Cooperate	☐ Ye			
Please tick as ap	propriate				
Positively Prepare ustified? Iffective? Consistent with No					
If you wish to s	ply with the duty to	cooperate. <u>Plea</u> Impliance or sou	Plan is not legally com use be as precise as pos undness of the Local Pla	sible.	
Urban	sprawl.			6	
D. 80	numbon	· non	thed		
100815					

Delte proposel to remove 100 four greenbelt

Representor Details

Web Reference Number	WF0476
Type of Submission	Web submission
Full Name	Mrs Lynn Balmer
Organisation	
Address	59 SANDHURST ROAD
	RAINHILL
	L358NF
Agent Details	Mrs Lynn Balmer
	59 Sandhurst Road, L35 8NF

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

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.

As a parent, I am concerned by tge amount of extra traffic building these houses on Eccleston Park Golf Club will create. Parking in Rainhill is already inadequate and traffic is extremely busy. Drs and schools are already at stretching point, with it taking weeks to get a drs appointment, which will get worse with so many more people moving in, putting strain on Whiston Hospital. There will also be no greenland around locally for families to enjoy nature.

7. Please set out modification(s) you consider are necessary

The community of Rainhill has not been approached by the council for their opinions as the majority are against this development.

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:



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

Ref: LPSD

(For official use only)

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Please 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).

9 MAY 2019

PART A - YOUR DETAILS

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

Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
Date: 27 4-2019

	sted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the d adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Councaddress is provided, we will conta	cil's preferred method of communication. If no e-mail act you by your postal address.



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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MC	Title:
First Name: BRIAN	First name:
Last Name: BAMBER	Last Name:
Organisation/company:	Organisation/company:
Address: 209 LEACH LANE SUTTON LEACH STHELENS	Address:
Postcode: WA9 4PM	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature: lease be aware that anonymous forms cannonyments to be considered you MUST include	Date: 29 - 4 - 19 not be accepted and that in order for your de your details above.
lease be aware that anonymous forms canromments to be considered you MUST include	not be accepted and that in order for your de your details above. ture stages of the St Helens Borough Local ne Plan for examination, publication of the



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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mr	Title:
First Name:	First name:
Last Name: BANBER	Last Name:
Organisation/company:	Organisation/company:
Address: 209 LEACH LANE SUTTON LEACH STHEZENS	Address:
Postcode:	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature: [lease be aware that anonymous form omments to be considered you MUST	Date: 28 · 4 · 2019 Is cannot be accepted and that in order for your include your details above.
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	on of the Plan for examination, publication of the



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

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

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1 3 MAY 2019

PART A - YOUR DETAILS

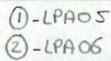
Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name:	First name:
Last Name: BAMBER	Last Name:
Organisation/company:	Organisation/company:
Address:	Address:
Address. 126 CARTONS LAWE	
	Postcode:
Postcode: WA9 492	Postcode:
	el No:

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.	





504

1 2 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 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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MiSS	Title:
First Name: Michaela	First name:
Last Name: Bancla	Last Name:
Organisation/company:	Organisation/company:
Hoydock Postcode: Wall OGA	Address:
Postcode: Wall OGQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 5/3/19

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.

	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the ad adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Coun address is provided, we will cont	cil's preferred method of communication. If no e-mail act 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 <u>PART B</u> 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.

this form before you complete	I			
3. To which part of the Local P	lan does this rep	resentation rela	ate?	
Policy Paragraph / diagram / table	Policies Map	Sustainal Appraisa Strategic Environm Assessm	nental	Habitats Regulation Assessment
Other documents (please nam document and relevant part/section)	е	× 1		
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Legally Compliant?	Yes 🗆		No 🗗	
Sound?	Yes	THE RESERVE THE PARTY OF THE PA	No 🗗	
Complies with the Duty to Cooperate	Yes 🗆		No C	
Please tick as appropriate			numan a	PROPRIED
Positively Prepared? Justified? Effective? Consistent with National Policy 6. Please give details of why your fails to comply with the duty If you wish to support the legal box to set out your comments	ou consider the L to cooperate. Ple	ease be as pred	cise as pos	ssible.
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capable of modification at examination). You will e Local Plan legally compliant or sound. It will be uggested revised wording of any policy or text. P	e helpful if you are able to put forward your
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Thank you for taking the time to complete and return this response form.

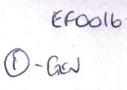
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PART B - YOUR REPRESENTATION

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 PI	an does this repre	sentation relate?	
Policy H 5 LP ADE	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nents (please name nd relevant part/sect	on)		
4. Do you co	onsider the St Helen ad the Guidance note	s Borough Local I	Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Com	pliant?		Yes No	
Sound?			Yes No	
Complies wi	th the Duty to Coope	rate	Yes 🖃 No	
Please tick a	as appropriate	onthinant		
S. If you or Please rea	nsider the Local Plan ad the Guidance note	n is <u>unsound,</u> is it for explanations of	because it is not: the Tests of Soundness	
Positively Pr	epared?			
Justified?				
Effective?				
Consistent v	vith National Policy?			
6. Please gi	ve details of why yo comply with the du	u consider the Loc ty to cooperate. P	cal Plan is not legally cor lease be as precise as po	mpliant or is unsound
use this b	ox to set out your c	omments.	soundness of the Local F	
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poste	,,,,			

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St Helens Local Plan Submission - Representation Form Jo Banks to: planningpolicy

2) -PARA 1.7.2

11/03/2019 09:28

- LPAOS

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



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

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: 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 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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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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01744 676190

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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.

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 He Please read the Guidance note	lens Borough Local P	Plan 2020-2035 is: al 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 Please read the Guidance note for e	is <u>unsound</u> , is it because it is not: 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 <u>support</u> 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.

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.

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 great and the council wanting to make a quick profit ra	een belt is gone for the benefit of house builders ather than rejuvenating exiting brownfield sites.
Please note your representation should cover su	Please continue on a separate sheet if necessary
supporting information necessary to support / just modification, as there will not normally be a substrepresentations based on the original representations will be of the control of the	stify the representation and suggested sequent opportunity to make further stion at the publication stage.
8. If your representation is seeking a modification the oral part of the examination? (the hearings in	; do you consider it necessary to participate at
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 other this to be necessary:	examination, please outline why you consider
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Please note the Inspector will determine the most who have indicated that they wish to participate at	t appropriate procedure to adopt to hear those the oral part of the examination
Thank you for taking the time to comp Please keep a copy fo	lete and return this response form. r future reference.



Objection to plans to build on Eccleston/Windle Greenbelt land. Gerard Banks

to:

planning policy @sthelens.gov.uk

11/03/2019 09:35

1 Attachment



Planning Objection.pdf

Dear Sir/Madam

Please find attached my objection to your plans to build on Eccleston/Windle Greenbelt land.

Kind regards

Gerard Banks 54 Ecclesfield Road Eccleston Mr & Mrs G Banks 54 Ecclesfield Road Eccleston St Helens WA10 6BN

11 March 2019

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

Dear Sir or Madam

agricultural land.

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan (2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on.

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From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an overambitious and aspirational housing target to be "exceptional circumstances".

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The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and

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According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term.

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Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier.

As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-



"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB:(Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more:

- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;
- Daily average speed will change by 10km/hr or more; and
- Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councillors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release.



Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt.



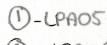
For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours faithfully

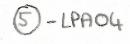


Gerard Banks

RO0099







Page 1 of 1 **ELOOIS**



LOCAL PLAN RESPONSE Maureen B to: planningpolicy@sthelens.gov.uk 06/03/2019 08:47

1 Attachment



LOCAL PLAN EMB.docx

PLEASE FIND ATTACHED MY RESPONSE TO LOCAL PLAN 2020-2035 SUBMISSION DRAFT

I have chosen to respond by letter as your online form is not user friendly.

Hard copies of the form do not provide sufficient space for considered response.

ELLEN M BARKER
1 THE NOOK
WINDLE
ST HELENS
WA10 6EN



6 FEBRUARY 2019

LOCAL PLAN
ST HELENS COUNCIL
TOWN HALL
VICTORIA SQUARE
ST HELENS
WA10 1HP

Dear Sir/Madam

Reference: St Helens Local Plan Green Belt Review (2018) Policy LPA05

I have chosen to respond by letter as your online form is not user friendly. Hard copies of the form do not provide sufficient space for considered response.

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when a the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.





The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues. The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period. Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that. The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring. The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has , significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23 The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP. The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities. The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided. The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal

document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

YOURS FAITHFULLY

ELLEN M BARKER (MRS)

RO0100

Page 1 of 1



FW: LOCAL PLAN

Colin b

to:

planning policy @sthelens.gov.uk

06/03/2019 18:21

1 Attachment



local plan cb.docx

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COLIN BARKER
1 THE NOOK
WINDLE
ST HELENS
WA10 6EN



LOCAL PLAN ST HELENS COUNCIL TOWN HALL VICTORIA SQUARE ST HELENS WA10 1HP

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