



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO0201 – RO0300

SEPTEMBER 2020

RO0201

Representor Details

Web Reference Number	WF0322
Type of Submission	Web submission
Full Name	Mr Paul Brabin
Organisation	
Address	13 East Close Eccleston Park Prescot Merseyside L34 2RA
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
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
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 proposal to remove the 3HS parcel of land from greenbelt is fundamentally unsound for the following reasons:

- 1) The surrounding road network is overloaded at peak times as it is (Portico Lane, Delph Lane, Two Butt Lane, Warrington Road etc). The overloading will be exacerbated by the hundreds of new houses being built on Scotchbarn Lane and Halsnead Garden Village.
- 2) This parcel of green land separates Eccleston Park, Rainhill and Nutgrove. If removed there will be a continuous suburban sprawl.
- 3) The increased traffic will pose a risk to health in terms of air pollution and pedestrian safety. St Helens has a higher average death rate from respiratory disease than England as a whole and Thatto Heath is the second worst affected area in the borough.
- 4) There are no local employment opportunities commensurate with the number of new homes proposed for this land, therefore prospective homebuyers will be working outside the borough and travelling to work probably via the M62 - leading to more pollution, traffic jams and carbon emissions.
- 5) The local secondary schools - Rainhill High, Prescot, and Edmund Arrowsmith are outside walking distance, leading to even more pressure on the roads.

- 6) The area currently supports many species of plants and animals, several of which are protected.
- 7) The current use of the land as a golf club provides a useful and beneficial service to the community both for physical exercise and social interaction. It is well patronised as is Grange Park golf club. There is clearly no oversupply of golf in the area.
- 8) 3HS is a zone 2 and zone 3 flood zone. Building on it will reduce the ability of water to drain away and increase the risk of local flooding.
- 9) There are plenty (enough for 5808 houses) of brownfield sites available in St Helens on which houses should be built first. Given the economic uncertainty of Brexit and the declining population and industry of St Helens it is unclear why there will be a demand for housing justifying building on greenbelt land.
- 10) There are a lack of places locally in doctors, dentists and primary schools which will only be exacerbated by the additional houses proposed.
- 11) 3HS could not be bettered as an example of why the concept of greenbelt land is an extremely valuable principle. Building on it would totally undermine the idea of Greenbelt land.
- 12) The areas around 3HS contain some very pleasant places to live - as I can attest having lived in Eccleston Park for many years - the quality of life here and in Rainhill, Prescot and Whiston will inevitably deteriorate if 3HS is used for housing.

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

The council should not remove this land from greenbelt to place in safeguarded. By keeping it as greenbelt it will be abiding by the National Planning Policy Framework (2019).

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	3/6/2019 8:03:44 PM
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RO0202

Representor Details

Web Reference Number	WF0039
Type of Submission	Web submission
Full Name	Mrs Tania Barker
Organisation	
Address	17 Sackville road Windle WA10 6JD
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	Impact of increased traffic/residents on local infrastructure/environment if 8HS/3HS are ever developed.
Paragraph / diagram / table	Para 109
Policies Map	8HS 3HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

The plan is based on flawed methodology. The plan is not deliverable. It does not comply with NPPF 2018

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

This version does not satisfy effective land use by concentrating on green space development over town centre development with higher densities. The Housing Need assessment does not use Standard Methodology and is based on out of date predictions rather than the 2016 ONS. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquility, general health and overall well being from enjoying one's local surroundings.

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

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

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

Response Date	3/13/2019 4:24:41 PM
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RO0203



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>Catherine</i>	First name:
Last Name: <i>Brewer</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>Emmavale Avenue</i>	Address:
Postcode: <i>WA8 7HZ</i>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date:

27-3-19

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.

RO0204

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>Tracey</u>	First name: _____
Last Name: <u>Brennan</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 Preston Avenue</u> <u>Crookle</u> <u>St. Helens</u>	Address: _____
Postcode: <u>WA9 4JS</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>16.3.19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☒ Yes (via email)

☐ No

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

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.**

RO0205



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

angelabrennand

to:

planningpolicy

12/03/2019 15:28

Hide Details

From:

To: <planningpolicy@sthelens.gov.uk>

EF0042

1 Attachment



SOGB FORM (1).doc

Please find attached my completed form giving my comments to additional housing proposed in the above plan,

Yours faithfully

A. Brennand



St.Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: Angela	First name:
Last Name: Brennand	Last Name:
Organisation/company:	Organisation/company:
Address: 3 Fawley Road Rainhill Merseyside	Address:
Postcode: L35 6PL	Postcode:
	Tel No:
	Mobile No:
	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.

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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FURTHER INFORMATION

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPA06 ①	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Yes <input type="checkbox"/> Don't Know <input type="checkbox"/>	No <input type="checkbox"/> Don't Know <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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

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

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

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

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

- ✓ Table 4.6 shows there is a need for 7245 houses which equates to an additional 1437 houses and 57 hectares of extra land needed not the 288 hectares shown in table 4.5.
- ✓ There has been a vast decline in industry in St Helens over the last 30 years and St Helens town centre has suffered a lot of retail outlets closing.
- ✓ The area of 3HS (EPGC) will rely on people being employed outside of St Helens to provide income-based salaries to purchase properties in the surrounding area.
- ✓ Rainhill has only one A road running through it (A57 Warrington Road) which services Rainhill itself as well as surrounding developments in Knowsley, including Scotchbarn Lane and the new Halsnead Green Village which is under the Liverpool City Regional Plan.
- ✓ Recent road works closed 2 minor roads in Rainhill for a number of weeks which resulted in long traffic jams along the main stretch of Warrington Road. Additional housing would increase traffic jams.
- ✓ The increase in traffic will have an impact on B and C roads causing increased congestion at peak times of the day.

- ①
- ✓ The increase in traffic will have an adverse affect on pedestrians safety and health (exhaust fumes)
 - ✓ Additional housing in the area is not sustainable due to the lack of school places, doctors and dental surgeries, hospitals and A&E. This will mean people using their cars for additional journeys to access services outside the development area.
 - ✓ Because of the need for off-street parking and the number of cars per household the majority of houses now have paved front gardens which results in the land being unable to soak up rainfall.
 - ✓ In recent years there has been an increase in flooding whereby drains on a number of roads cannot cope with the amount of rainwater. Building on additional land in Rainhill will cause further flooding
 - ✓ The parcel of 3HS land supports species of flora and fauna, a number of which are protected.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

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

RO0206



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS.</u>	Title:
First Name: <u>AND</u>	First name:
Last Name: <u>BRIDGE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>13. NEWBOLD COURT</u> <u>ST. HELENS.</u>	Address:
Postcode: <u>WA9 4TE</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>12/5/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

Yes ☐ (Via Email)

No ☒

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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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 at www.sthelens.gov.uk/localplan.

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

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

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

RO0207

1419

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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>KEITH</u>	First name: _____
Last Name: <u>BRIDGE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>22 STATHAM AVENUE</u> <u>BELLINGE, WIGAN</u> <u>LANCS</u>	Address: _____
Postcode: <u>WN 5 7RZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12/5/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☒ Yes (via email)

☐ No

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</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.

THE WAY IT IS WORDED ON THIS FORM AND LINKING IT TO THE PLAN IS MISLEADING AND DIFFICULT TO FOLLOW. I BELIEVE IT IS DESIGNED TO LEAD TO CONFUSION AND MISUNDERSTANDING. (SECTION 3 OF THIS DOCUMENT IS TOTALLY INADEQUATE AND NOT FIT FOR PURPOSE AND THEREFORE I CANNOT COMPLETE IT AS I WISH

Please continue on a separate sheet if necessary

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

THE WORDING OF THIS SECTION IMPLIES AGREEMENT WITH THE PLAN AND THAT ANY SUGGESTED MODIFICATIONS IMPLIES SUPPORT TO THE PLAN.

I TOTALLY DISAGREE TO ANY ALTERATIONS TO THE GREENBELT. THERE ARE MANY ARGUMENTS AGAINST THIS PLAN AND THE COUNCIL ARE JUST TAKING THE EASY OPTION BY USING LAND WHICH IS EASY TO BUILD AND DEVELOP WITHOUT CONSIDERING IMPLICATIONS (NEGATIVE) FOR THE RELEVANT COMMUNITIES CONCERNED.

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

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

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

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



Yes, I wish to participate at the oral examination

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

BECAUSE THE COUNCIL / PLANNERS NEED TO UNDERSTAND THE FEELINGS OF THE COMMUNITY AND THE STRESS IT IS CAUSING.

ALSO (ONLY HEARD) OF THIS PLAN YESTERDAY ~~WHICH IS INSUFFICIENT TIME TO~~ IT SHOWS THAT THE COMMUNITY WAS NOT FULLY INFORMED WHICH I ~~ASSUME IS ILLEGAL~~

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

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

Please keep a copy for future reference.

General Advice

- 4.1 If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make it clear in what way the Plan or part of the Plan is not sound having regards to the legal compliance, duty to cooperate and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified.
- 4.2 Representations 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 submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.
- 4.3 Where there are groups who share a common view on how they wish to see a Plan modified, it would be helpful for that group to send a single representation which represents the view, rather than a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



St. Helens Council

Contact Centre

Wesley House
Corporation Street
St Helens
WA10 1HF

Tel: 01744 676789

Minicom: 01744 671671

→ www.sthelens.gov.uk/contactus

Please contact us to request translation of Council information into Braille, audio tape or a foreign language.

RO0208

① - LPA04 ② - Statement of Common Ground
③ - LPA05 ④ - Statement of Common Ground

Ref: LPS

01 MAR 2019

(For official use only)



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>DENNIS</u>	First name:
Last Name: <u>BRIERS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>165 LIVERPOOL ROAD</u>	Address:
<u>POWELL</u>
<u>ST HELENS</u>
Postcode: <u>WA11 9RX</u>	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:
Signature: [Redacted] Date: <u>25/2/19</u>	

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

**Now please complete PART B of this form,
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.

WAREHOUSING BETWEEN LUGGER RD/MILLFIELD LANE/HAY-DOCK LANE

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

Policy LPAD4 2EA 5EA 6EA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

Additional traffic will add to the over-capacity in the locality
 2EA at FFN has already been granted - which is in the greenbelt
 The release of the greenbelt will cause significant harm to the intended purpose of the greenbelt.
 The use of greenbelt is not encouraging derelict land to be recycled
 Additional development will increase the risk of flooding downstream at Clipesley Rock
 There is no statement of common ground with neighboring authorities

Please continue on a separate sheet if necessary

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

The proposal to remove He land from the green belt
Should be deleted.

Please continue on a separate sheet if necessary


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

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

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


--

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

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Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy LPA05 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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over the last 3 Census returns the population of the borough has declined, proof of population projections required. No common ground with neighboring authorities has been demonstrated. There are known existing problems re flooding at this site this would exacerbate the problem & place pressure on Clwyd Popok. Greenbelt release would cause significant harm to its purpose. Due to lack of local services eg doctors, nurseries, schools, bus routes etc this development is NOT sustainable & would be car dependent. Urban regeneration would not be achieved as land would not be recycled or reclaimed derelict land used. Inadequate site access onto A580 would be dangerous. The junction at Liverpool Rd / A55 / A580 is already at capacity.

(3)
(4)
(3)

Please continue on a separate sheet if necessary

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This proposal should be deleted & not removed from the greenbelt

Please continue on a separate sheet if necessary

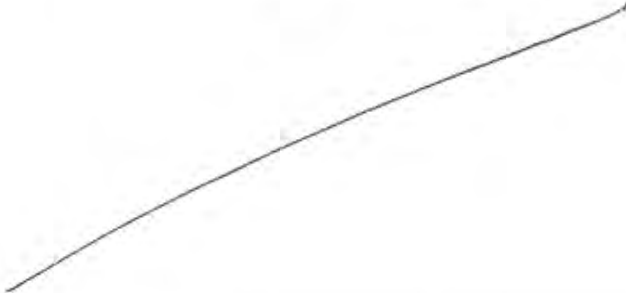
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No	<input checked="" type="radio"/> No, I do not wish to participate at the oral examination		<input type="radio"/> Yes, I wish to participate at the oral examination
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RO0209

13 MAR 2019



St.Helens
Council

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Representation (i.e. Comment) Form**

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Brine	Last Name:
Organisation/company:	Organisation/company:
Address: Friars Cottage Houghtons Lane, Eccleston, St Helens Postcode: WA10 5QE	Address:
Tel No:	Postcode:
Mobile No: [REDACTED]	Tel No:
Email: [REDACTED]	Mobile No:
	Email:

Signature: [REDACTED]	Date: 12-3-19.
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Yes ☒ (Via Email)

No ☐

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Merseyside
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3. To which part of the Local Plan does this representation relate?							
Policy	01, 02	Paragraph		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
	04, 05	Diagram					Habitats Regulation Assessment
	06, 08	Table					
Other documents (please name document and relevant part/section)							

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

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

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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

Please see attached representation.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (This need not apply if you are not seeking a modification.)

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

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**Thank you for taking the time to complete and return this response form.
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STEPHEN BRINE
FLIMS COTTAGE
HOUGHTONS LANE
ECCLESTON
ST. HELENS, WAT0 5QE

PART B -YOUR REPRESENTATION

I firmly believe that the Submission Draft fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF)

I believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. The Submission Draft is not positively prepared, justified, effective or consistent with National Planning Policy.

Please note that I am in agreement to the representations made by **St Helens Green Belt Association (SHGBA)** and **Eccleston Community Residents Association (ECRA)** but in addition I would also make the following specific points:

Duty to Cooperate

The Submission Draft provides no evidence that the Council have satisfied their Duty to Cooperate. There is no evidence that the Council has satisfied this legal requirement. The Council seems to be competing with neighbouring local authorities for the same residents which will just create inward migration

①

LPA01 Presumption in Favour of Sustainable Development

I support Policy the Presumption in Favour of Sustainable Development but I am concerned that some policies in the Submission Draft will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just

②

LPA02 Spatial Strategy

In setting out this very ambitious strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attached to Green Belts. The "essential characteristics of Green Belts are their openness and their permanence". The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the "great importance" of Green Belt, their essential characteristics or purposes.

I understand that "exceptional circumstances" need to be demonstrated to release land from Green Belt. I cannot see anywhere in the Submission Draft where "exceptional circumstances" have been demonstrated.

③

LPA04 A Strong and Sustainable Economy

The Submission Draft suggests that St Helens growth trends are significantly higher than historic annual growth rates.

The economic outlook in the Submission Draft is based on out of date forecasts and employment growth is highly aspirational and optimistic. It is relying almost entirely on significant growth of logistic warehousing and does not take into account that warehousing jobs will be at risk because of future automation. It also does not take into account the influence that Brexit could have on the Liverpool Super Port and employment in transportation and warehousing in the region.

As such I believe that employment growth in the Submission Draft is not objectively assessed need but is out of date and extremely aspirational. It has been used subjectively to create a supply side scenario that is not supported by recent economic data and trends.

④ **LPA05 Meeting St Helens Borough's Housing Needs**

The Submission Draft sets out an ambitious strategy for the Borough over the period 1st April 2016 and 31st March 2035 planning for a minimum 9,234 net additional dwellings, at an average of 486 dwellings per annum which includes releasing land from the Green Belt for 2,172 new homes.

In doing so the Council are using an older ONS forecast (2014) of 486 houses per year being required when the latest estimate produced by the ONS (2016) predicts 383 houses per year are required. Surely, the most up to date figures should be used for something as important as a 15 years plan. If the Council used the more recent figures then there would be no need to release land from Green Belt for housing.

I note the Andy Burnham, the mayor of Greater Manchester, was very recently reported as taking issue with Kit Malthouse the Minister for Housing, over which set of housing projections Greater Manchester should use. 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"

⑤ **LPA06 Safeguarded Land**

I understand that in drawing up new Green Belt boundaries the Council, where necessary, should identify areas of safeguarded land between urban area and the Green Belt in order to meet long term development needs beyond the Local Plan period but make clear that the safeguarded land is not allocated for development at the present time.

The Submission Draft goes further than this by specifically identifying sites, their preferred use and development capacity. This is not consistent with national policy as it is tantamount to allocating sites.

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, in St Helens the areas surrounding the town centre where community is most in need of the new housing and investment.

One particular area of Safeguarded Land which I will comment on later is the land referred to in the Submission Draft as "Land South of A580 between Houghtons Lane and Crantock Grove, Windle" known as 8HS.

⑥ **LPA08 Infrastructure Delivery and Funding**

I'm not entirely sure what the Infrastructure Delivery Plan (IDP) document is as it doesn't really appear to be a plan at all. It does not provide any solutions to the problems that delivering this Local Plan will bring.

This IDP does not deliver any sort of plan at all to manage the employment and residential growth that is being assumed. It details some infrastructure projects that are currently underway for the problems of today, but doesn't actually appear to plan anything for the Local Plan.

The IDP touches on Healthcare and Education but how these will be funded or managed is 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.

Brownfield and Previously Developed Land.

The Submission Draft makes little or no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register. It is wrong to give up Green Belt land when so much Brownfield land is available within the Borough, land which could and should be developed.

Historically St Helens has a strong industrial heritage of both mining and glass works. Now that those industries are largely redundant in St Helens there is a large amount of Brownfield land close to the town centre which could be redeveloped for housing within the 15 years plan. 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 and 148 hectares are being reclassified as safeguarded land and included to fulfil the housing need, much less than 7% of the 3,170 hectares available, if it were to be remediated.

Brownfield sites tend to be closer the Town Centre and already have road infrastructure in place. New homes being built on the sites closer to the Town Centre would mean the residents would have greater access to public transport, both buses and trains, and the services in the Town Centre. I believe developing the Brownfield sites which are closer to the Town Centre would help regenerate the Town Centre.

Green Belt Review

In order for the Local Plan to be sound, it must surely be built upon the integrity of its data. The Green Belt Review document forms a significant part of the data but its validity needs to be questioned.

The points raised throughout the Green Belt Review (2018) clearly show inconsistencies with subjective scoring and findings. There is a significant element of subjectivity. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

Certain sites have been pre-selected for development, rather than being tested against other sites. I believe this to be true in the case of the land referred to as 8HS which is presently Green Belt land but is proposed to be released from Green Belt and safeguarded for development.

Site- Specific Comments

8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.

The Submission Draft proposes that land known as 8HS is removed from the Green Belt and safeguarded for development in the future. I wish to make the following additional comments in relation to that land.

8HS can be summarised as follows:

- It is a large area of Grade 1 and Grade 2 Agricultural Land
- It is still actively farmed and produces crops throughout the year
- It has a number of regularly used public footpaths running through it
- It contributes to the life, health and well being of St Helens residents
- It provides natural habitat for wildlife and birds
- It has a brook running through it and is it has a flood plain within Flood Zone 3

Reasons why 8HS should remain within Green Belt:

1. Exceptional Circumstances

I cannot see anywhere in the Submission Draft where "exceptional circumstances" have been demonstrated for this land to be released from the Green Belt.

2. Grade 1 and Grade 2 Agricultural Land

The land at 8HS has been farmed since the 1850's and is still actively farmed.

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.

This agricultural land also provides valuable employment to the farmers and the locals involved in the farming of the land and distribution of the crops. This employment would be lost if this Green Belt land was released and subsequently developed.

In the present economic client, uncertainties due to Brexit and concerns over climate change (according to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050) it is more important than ever to preserve and farm quality agricultural land to continue to produce local crops.

Also, by having local produce available this can help reduce traffic and pollution problems associated with the transporting of produce. It also helps the regeneration of St Helens to encourage local shops and food outlets to support local farmers by purchasing their produce

The objective of the Submission Draft is largely to promote employment and economic growth, and the housing requirement assumes a significant uplift is needed to allow for this, yet here the effect will be negative. Furthermore, there does not appear to be any reference to the Council having followed the requirement to consult with Natural England over the loss of Grade 1 Agricultural (or BMV) Land.

3. Flood Plain

8HS has a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system and has a brook running through it.

At the time of the review, the 2012 NPPF provided the governing planning rules attached to all elements of the planning process. In terms of flooding etc.... Section 10 - Meeting the challenge of climate change, flooding and coastal change set out the Government's policies. In this case, paragraph 100 identified the following:

"Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change by applying... the Sequential Test."

St Helens Council did not follow the applicable policy and legally required directions set out in the NPPF, as it chose not to Sequential Test any sites that were susceptible to flooding and identified in a flood risk area. This has resulted in the **8HS** site being left as a preferred option, despite there being many other sites identified in the Green Belt Review, that did not fall within an area of potential flooding, which paragraph 100 seeks to fundamentally avoid.

8HS should therefore not be released from Green Belt and safeguarded for development as it was not tested in any way, but remained as a preferred option.

This is a failure of policy and potentially makes **8HS** allocation unlawful.

4. Traffic and Road Safety

8HS is not a sustainable parcel of land on which to build 1,027 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super Port to the M6.

There is a large volume of HGV traffic using the A580 between the M57 and the M6. The 10 miles stretch is being developed for giant warehousing projects, advertising "direct routes to Liverpool and Manchester". HGV drivers would opt for this route when delivering to the outskirts of Manchester and Liverpool.

All of this traffic on the A580 is adjacent to the **8HS** site.

The growth of online shopping has also caused an increase in local van deliveries. According to the ONS, in 2017 77% of adults had bought goods or services online and supermarket home delivery services are growing within the area. Meanwhile, Amazon is about to open a vast warehouse at Florida Farm, Haydock on the A580. This new Amazon warehouse will be 361,000 sq ft, have 111 docking spaces and spaces for 211 HGVs.

This increased traffic through internet sales and purchases will not just affect Haydock and J23 of the M6, but will impact all along the A580 to Liverpool adjacent to the **8HS** site.

Building 1,027 houses on **8HS** is likely to produce a further 1,800 cars which would considerably increase the daily commuter traffic on the A580 and on the surrounding roads on the village side of **8HS**. This increase in is unsustainable.

This will significantly impact on air quality, noise, tranquillity and health in general.

Story Homes who wish to develop the **8HS** site propose to build a new roundabout on the A580 to give access to their new development on **8HS**. This roundabout close to Windle Island would have a severe negative impact on the flow of traffic on the A580 and would result in

tailbacks of cars, vans and HGV's on the A580 which is already backed up at peak times of the day. Engines would be idling which would have a significant impact on air quality, noise and health in general.

The increase of a further 1,800 cars would be in the exact area that St Helens already has significant and intractable problems, at Windle Island and Bleak Hill/Rainford Road. Problems that already cannot be rectified and would be exacerbated.

Further, the roads adjacent on the village side of **8HS** are narrow and cannot accommodate the extra cars that 1,027 houses will generate.

8HS is not well serviced by public transport. The train stations are in the town centre, over 4 miles away. The current buses do not connect Eccleston and Windle with employment areas.

The majority of the **8HS** site would be in excess of 500m from a local store and over 1km to any sort of 'local centre'. This would increase the dependency on motor vehicles, especially for short trips, and again increase the traffic and congestion in the area.

Pedestrian safety has not been considered by the Council. Access to the nearest convenience store would require residents to have to cross on foot 4 lanes of the A580 without the aid of a foot bridge.

5. Infrastructure

There does not appear to be anything in the Infrastructure Delivery Plan for the 1,027 additional houses that would be built on **8HS**.

Development at **8HS** would result in unsustainable traffic growth which would cause severe traffic issues that surely cannot satisfy the NPPF. As I have already stated, this traffic growth will be in the exact area that the Borough already has significant and intractable problems, at Windle Island and Bleak Hill/Rainford Road. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded.

The IDP touches on Healthcare and Education but how these will be funded or managed is 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.

The IDP does not address the school places that will be required for 1,027 new homes at **8HS**. The Primary and Secondary schools local to **8HS** are already oversubscribed.

To introduce so many new family homes would result in the schools being unable to meet the demand for places and young children having to travel to different areas to attend school. Having to travel to schools further away would also add to the traffic congestion.

New schools would be required if **8HS** was developed but there is nowhere available to build them.

There is a total lack of infrastructure to support such a large site and nothing in the Plan to remedy this.

6. Footpaths

8HS has public footpaths that are regularly used by residents of St Helens by just being out for a walk with family and friends, walking their dogs or rambles on the footpaths and breathing in good clean air. To remove this easily accessible Green Space would contribute to obesity and other associated health problems.

7. Noise and Air Pollution

The substantial increase in traffic created by 1,027 new homes on **8HS** will increase the Noise and Air Pollution. I understand that it is now accepted that there is a link between pollution and diseases such as dementia and asthma. With the roads around Eccleston being ill-equipped to cope with a sharp increase in vehicles on the road, releasing this vast amount of Green Belt in Eccleston would put the health of Eccleston residents at risk.

8. Local Wildlife

8HS is home to numerous species of birds, including corn bunting, long tail tits, owls and birds of prey have been spotted. Other wildlife including bats and hares are often seen on this Green Belt land. There are also migrating birds including Canadian Geese that come to this Green Belt land. All of these will be disturbed and lost from the area should the land be released from Green Belt, to enable development to take place, taking away their natural habitat due to loss of important trees, hedges and other vegetation.

8HS was pre-selected for Development

Despite all of the above factors, I believe that **8HS** was pre-selected by the Council and allocated for release from Green Belt for development in the future prior to the Green Belt Review as a particular builder wished to develop the site by building approximately 1,000 new houses.

The first time the residents of St Helens became aware of the Council's proposal to release the land now known as **8HS** from Green Belt was when the proposed release was included in the Council's "Local Plan Preferred Options" in late 2016 / early 2017.

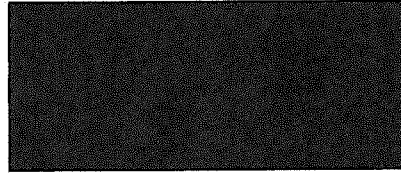
Despite the public not having had any prior knowledge of the proposed release of such a large site from Green Belt, Story Homes, a house builder based in Carlisle, had already gone to the time and expense of entering into an Option Agreement collectively with the 7 different land owners of the site.

Although the land is Green Belt and protected from development, Story Homes clearly believed it would be released from Green Belt and available for development at some time in the future and had therefore entered into the Option Agreement.

Despite the large size of the site and the fact that it was Green Belt the Council then chose to promote it as one parcel of land for development.

Prior to the Council's Submission Draft being released Story Homes had already named their proposed development on **8HS** as "Eccleston Vale" and produced "glossy" brochures portraying the proposed development.

Story Homes and many other developers chase land value rises from farmland being allocated for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors.



RO0210

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>LEE</u>	First name: _____
Last Name: <u>BRISCOE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 ABBOTSHAW AVE</u>	Address: _____
<u>CLOCKFACE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA9 4UX</u>	Postcode: _____
_____	Tel No: _____
_____	Mobile No: _____
_____	Email: _____

Signature: _____

Date: 14/3/19.

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

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO0211



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name:	First name:
Last Name: <u>DANIEL</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>10 Chatters Court Chatterton</u>	Address:
Postcode: <u>WA10 3EX</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: [REDACTED]
-----------------------	------------------

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

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

Yes ☐ (Via Email)

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.

RO0212

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SHARON</u>	First name: _____
Last Name: <u>BRISCOE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 ABBOTS HALL</u> <u>AVE, CLOCKFACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4UX</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>14/03/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☐ Yes (via email)

☐ No

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

RO0213



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: <i>STAN</i>	First name:
Last Name: <i>BRISCOE</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>28 CRAWFORD ST CLOCK TALE</i>	Address:
Postcode: <i>WA9 4X1T</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>11/3/2019</i>
--	------------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

IN LINE WITH BOLD AND CLOCKFACE
ACTION GROUP

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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.

RO0214



St. Helens
Council

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

Ref: LPSD

13 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

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: ANDREW	First name:
Last Name: BROABBENT	Last Name:
Organisation/company:	Organisation/company:
Address: 2 Kenway Rainford	Address:
Postcode: WA11 8AX	Postcode:
[REDACTED]	Tel No:
Mobile No: NONE	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

11/3/19

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

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

Yes ☐ (Via Email)

No ☒

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

1. There are no exceptional circumstances to justify not using the standard method of housing needs
2. Ecomic analysis is flawed and based on over optimistic assumptions
3. The amount of land needed is therefore not as high as set out in the local plan.
4. Therefore there are no exceptional circumstances as required to change green belt boundaries.
5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
6. The Council have failed to co-operate with other councils in any meaningful way and have not published statements of common ground.

Please continue on a separate sheet if necessary

For these reasons it should fail both the legal tests & the test of soundness.

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

RO0215



St. Helens
Council

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

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: EMMA

Last Name: BROADBENT

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 4-3-19.

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

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	L P A O5	Paragraph/ diagram table	2HA	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>No justification for the scale of development based on population density.</p> <p>No provision for infrastructure</p> <p>High volumes of predicted traffic on already heavily congested highways</p> <p>Goes against the purpose of greenbelt provision</p>

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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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.

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	L P A 06	Paragraph/ diagram table	2 ES	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The council has already granted planning permission in the greenbelt in respect of site 2 EA - Florida Farm North, less than 2 miles from this site and has also received applications for similar developments at 5 EA, land to west of Haydock Lane and 8 EA, Parkside West.</p> <p>NOT JUSTIFIED - council needs to provide strict proof for development type. This allocated Safeguard site should be kept under greenbelt and re-evaluated at the end of local plan period.</p> <p>High volumes of predicted traffic will add to already over capacity June 23 of the M6.</p>

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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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.

RO0216

① - LPAOS

② - Para 1.7.2 DTC

PROSS4



St. Helens
Council

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

Ref: LPSD

13 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

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: FRANK ALAN	First name:
Last Name: BROADBENT	Last Name:
Organisation/company: -	Organisation/company:
Address: 2, KENWAY RAINFORD	Address:
Postcode: WA11 8AX	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/3/19

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

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

Yes ☐ (Via Email)

No ☒

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

1. There are no exceptional circumstances to justify not using the standard method of housing needs
2. Economic analysis is flawed and based on over optimistic assumptions
3. The amount of land needed is therefore not as high as set out in the local plan
4. Therefore there are no exceptional circumstances as required to change green belt boundaries
5. Other reasonable alternatives have not been fully explored such as lower target figures and using more previously developed land
6. The Council have failed to co-operate with other Councils in any

Please continue on a separate sheet if necessary

meaningful way and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness.

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

RO0217



Local Plan Submission draft 2020-2035

Nigel & Elaine

to:

planningpolicy

26/02/2019 12:48

Hide Details

From: Nigel & Elaine

To: planningpolicy@sthelens.gov.uk

E L0006

8HS

① LPA06

④ 10P

② LPA05

③ LPA02

Dear Sir,

①

I am writing to object to the Council's Local Plan for the change in classification from Green Belt to Safeguarded of the area south of the A580 and east of Houghtons Lane referred to in the Plan as 8HS.

My reasons for the objection are as follows:-

1. The forecast population growth figures used are out of date and the latest figures from ONS show that by 2041 the population will grow by circa 8000.
2. Housing requirements to cover the population growth alone taking the current occupancy rate of 2.2 (census 2011) would be 160 per annum. ②
3. The housing forecast of 383 new houses p.a. (ONS 2016) is 103 p.a. less than the figures quoted in the St Helens Local Plan Submission Draft (486p.a.) and both figures therefore are assuming a very optimistic economic growth for the region. Is that realistic?
4. Land available for new housing in the Plan is not taking into account the 3170 hectares of lowest priority Contaminated land which if included would provide a more sustainable solution to housing needs as a lot of the land is located around the town centre thus positively impacting the urban regeneration programme. ③
5. To retain 8HS as Green Belt would only need less than 7% of the lowest priority contaminated land to be made available for development
6. The proposed reclassification of land 8HS from Greenbelt to Safeguarded would if released in the future for house building extend the urban boundaries creating a residential area dependent on car transport. Increased traffic in this area would put a huge strain on the current road network and if a new junction onto the A580 was created this would adversely effect the East West traffic flow significantly and cause unacceptable congestion on Bleak Hill Road that would not be alleviated by the current extensive changes at Windle Island junction. ④
7. The Plan does not consider the full impact on Healthcare and Education A local school has already increased the intake per annum from 50 to 75 to cater for the current local population indicating schools are at full capacity. ④

I suggest that the area 8HS has been unjustifiably taken out of Green Belt designation when there are more sustainable solutions in the borough. I propose that the area should remain as Green Belt at least until the next Local Planning Review when a more realistic assessment of housing needs can be undertaken following the economic growth which is anticipated as part of the growth strategy for the Northern Powerhouse Initiative.

Yours faithfully

E C W Brocklehurst
134, Bleak Hill Road
Windle
St Helens
WA10 6DN
Sent from my iPad

RO0218

Representor Details

Web Reference Number	WF0437
Type of Submission	Web submission
Full Name	Mr Nigel Brocklehurst
Organisation	
Address	134 Bleak Hill Road, Windle, St. Helens. WA10 6DN
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	Release of Green Belt land
Paragraph / diagram / table	Site ref. 8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

Ref. the St. Helens Local Plan Submission Draft (2020-2035)

and specifically the Green Belt land known as 8HS (Site ref. GBP_098)

The Local Plan has re-classified the 8HS site as "safeguarded" in order to meet potential housing needs beyond the Plan period, currently 2035. This is totally unjustified.

In order to make a change to the Green Belt boundary the Local Plan has to detail any 'exceptional circumstances' (National Planning Policy Framework (NPPF) para 83). Housing (or employment land need) can be an exceptional circumstance to justify a review of the Green Belt boundary. Where is the Council's evidence that there are 'exceptional circumstances'?

Population:-

In the "Population Bulletin" dated December 2018 the St. Helens Council quotes population forecasts in line with the latest published data from the Office for National Statistics (ONS):-

Current population	179,331	
Population by 2025	182,900	increase of 3,569
Population by 2041	187,300	increase of 7,969

Using the same ONS data the forecast for the period covered by the Local Plan up to 2035 is 185,742, an increase of 6,411.

Housing:-

To calculate housing needs, guidance was given to the Council to ignore the above Office for National Statistics data from 2016 and instead to use data from 2014. Why should out-of-date data have been used when more recent, and more realistic, published forecasts were available? The result is that an unreal population growth figure has been used as the unsound starting point for calculating the housing need.

Historically occupancy per dwelling has been around 2.2 people per dwelling. A simple projection based on population growth alone would therefore indicate a housing need of 2,962 by 2035. This averages out at 174 houses per year. The Local Plan, using out-of-date population forecast data and factoring in unsubstantiated economic growth aspirations, states that the housing need is 486 per annum. The difference cannot be justified and the methodology is unsound.

Urban regeneration:-

In assessing the reclassification and release of Green Belt land, there are five "Purposes" specified by the National Planning Policy Framework (NPPF) which have to be considered. Green Belt Purpose 5 should be observed by the Council - "to assist in urban regeneration by encouraging the recycling of derelict and other urban land". The Council emphasises that urban regeneration and town centre rejuvenation are two of its biggest priority strategies. The "Contaminated Land (CL) sites (2015)" indicates that 3,170 ha of the lowest priority contaminated land exists in St. Helens. In the Local Plan all the Green Belt sites which are to be reclassified as 'safeguarded land sites' represent less than 7% of the 3,170 ha available if it were to be remediated. The Council is not honouring its commitment to urban regeneration and not maximising the opportunities offered by existing brownfield sites.

Traffic:-

The existing road network around the 8HS site would not be able to cope with the additional traffic resulting from any housing development on the site. In the absence of public transport, the increase in traffic would be approximately 900 vehicles for people travelling daily to work (estimated from 2011 Census data) in addition to the daily flow of vehicles for shopping, school runs, businesses, deliveries, tradesmen, leisure and visitors. The suggestion of introducing another major intersection on the A580 East Lancs Road at the end of Houghtons Lane would create a bottleneck for traffic flowing along the A580 and create another potential accident blackspot. Feeder roads back from the site towards St. Helens town centre which are already congested would be overloaded and cause yet more pollution.

Conclusion:-

In consideration of all the above factors, I must ask you to record my objection to the Local Plan proposal to release Green Belt land, specifically site ref. 8HS. Green Belt land cannot justifiably be reclassified as 'safeguarded'. It must not be allowed to go ahead. The basis is unsound.

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

Brownfield sites must be cleared and made available for redevelopment, before any Green Belt land is reclassified. The Council needs to honour its strategy for urban regeneration.

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 1:23:21 PM
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RO0219



St. Helens
Council

260

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

Ref: LPSD

01 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

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: Les Brooks Mr.	Title: _____
First Name: Leslie	First name: _____
Last Name: Brooks	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: 64 Avondale Road Haydock	Address: _____
Postcode: WA11 0HA	Postcode: _____
Tel No: [REDACTED]	_____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: 25-2-2019
-----------------------	-----------------

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

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

☐ Yes (via email)

☐ No

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

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA05 Site 2HA									
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

This development is not justified. Population of St. Helens is falling. Why are so many houses required, particularly in the green belt when there is ample brownfield land? Access to the site is inadequate & roads already congested. Danger of rat running through the proposed estate. Existing flooding problems at this site. This development & proposed development north of the East Lancs Road will place greater amounts of water in the Clipsley Brook & add to existing flooding problems at Ship Inn.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the 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.

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

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

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA 04 Sites 1EA, 5EA & 6EA									
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Strict proof is required that the Council needs this type of development in this place.
 Many empty units on Heydock Industrial Estate.
 Green belt should not be used as a quick fix for the Council's financial problems.
 Extra traffic will exacerbate and already overloaded highway system. Concretising over of 160 acres region of Clisley Brook will lead to flooding problems.

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)

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

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

<p></p>	<p></p>
---------	---------

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.

RO0220



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**.
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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

13 MAY 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JASON	First name:
Last Name: BROOKS	Last Name:
Organisation/company:	Organisation/company:
Address: 11 Petunia Close ST. HELENS	Address:
Postcode: WA9 4ZU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 21/4/19
-----------------------	---------------

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

Yes ☒ (Via Email)

No ☐

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RO0221



St. Helens
Council

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

Ref: LPSD

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13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: KATE	First name:
Last Name: BROOKS	Last Name:
Organisation/company:	Organisation/company:
Address: 11 PETUNIA CLOSE NEW BOLD ST HELENS	Address:
Postcode: WA9 4ZU	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 21.4.2019
-----------------------	-----------------

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RO0222



St. Helens
Council

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PART A – YOUR DETAILS

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

1261
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>SAMANTHA</u>	First name:
Last Name: <u>BROOKS-BIRKETT</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SAMPHIRE GARDENS</u>	Address:
Postcode: <u>NEWBOLD</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

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No ☐

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

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

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

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

NEXT STEPS

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RO0223



St. Helens
Council

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PART A – YOUR DETAILS

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13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>Tim</u>	First name:
Last Name: <u>BROOKS BIRKETT</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SAMPHIRE GARDENS NEWBOLD ST HELENS</u>	Address:
Postcode: <u>WA9 4ZP</u>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>11/5/19</u>
-----------------------	----------------------

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Yes ☒ (Via Email)

No ☐

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RO0224

12 MAR 2019

450

29, Ecclesfield Rd;
Eccleston,
St. Helens,
WA10 5 NE.

Dear Sirs or Madam,

I am writing my final letter regarding 'Local Plan' buildings proposed for Eccleston/Windle/Black Hill.

I feel most strongly that we should have no more development in these areas.

Firstly, the amount of traffic noise and pollution this would bring is unacceptable.

We have already seen much housing built at 'Eccleston Grange' and Millfields, plus houses built on the old site of the Carmelite Monastery, corner of Howards Lane and Houghtons Lane.

Already I have noticed a big increase in traffic in these areas.

I am very much against the so called 'Savaguarding' our green belt, and would very much hope that it will be removed from 'Savaguarding' and put back to 'Green Belt' land, for good.

I also feel that Brownfield Sites should be built on before good farm land with Grade I and Grade II land that is Agricultural.

Regarding less contaminated sites, mainly industrial or chemical land. I feel a very good point was made about making builders pay for it to be cleared if they and the council wish to build more houses.

I was shocked to read that the old Ravenhead site is being offered for sale for warehousing and industrial development, so close to the town centre. Surely that should be used for building small and affordable housing, that we are constantly told is badly needed?

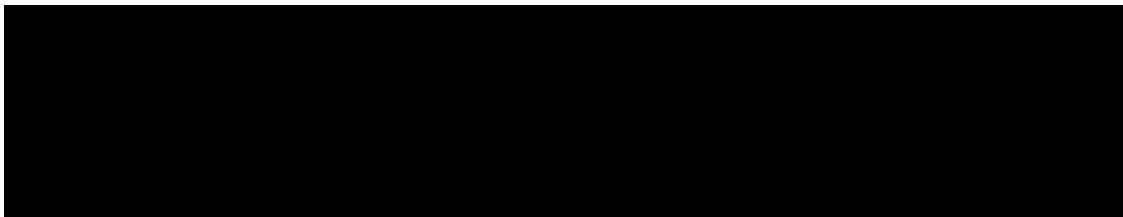
Our Green Belt areas here in Eccles ton / Windle / Black Hill is much valued by all the residents, plus our wildlife should be protected. Once it's gone, it's gone forever!

Yours faithfully
Mrs Pamela Kaye Broughton.

RO0225



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd
 Shaun Taylor
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 14:21



5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf



Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf



Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

Kind regards
 Shaun



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 PLANNING & DEVELOPMENT

LIVERPOOL • LONDON • NEWCASTLE • MANCHESTER

Shaun Taylor
 Managing Director





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St Helens
Council

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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: Mr	Title: Mr
First Name: Andy	First name: Shaun
Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm Mag Lane Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature 	Date: <div>13.3.19</div>
---	--------------------------

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Yes ☒ (Via Email)No ☐

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St.Helens
Merseyside
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 part of the Local Plan does this representation relate?								
Policy	LPA02	Paragraph / diagram / table	Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram)	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . 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

Criteria 1 & 2

Policy LPA02 sets out the Spatial Strategy for the borough. The Policy is clear that growth in St

Helens should be focussed within the Key Settlements. In addition, Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram) within the LPSD clearly indicates that Site Ref. 3HS is on the edge of the St Helens Core Area and is therefore a highly sustainable location for future housing development. Paragraph 4.68 further notes that "Land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements".

We contend that residential development at Site 3HS is fully in accordance with Policy LPA02 as the site is clearly on the edge of the St Helens Core Area and in a highly sustainable location. The site can deliver a significant element of housing within the plan period (market and affordable homes) and should be allocated within the Local Plan rather than safeguarded – there are no deliverability issues associated with this Site. Whilst it may be reasonable to enable some new housing development to come forward in the outlying areas of the Borough, the Council has taken a disproportionate approach by not allocating the Eccleston Park Golf Course, given its better location and proximity to the urban core and its overall sustainability. For the reasons set out in section 5 of the accompanying representations, the site is sustainable, unconstrained and deliverable and should therefore be allocated to contribute towards the identified housing requirements.

Criteria 4

Criteria 4 is concerned with releasing land from the Green Belt and safeguarding it to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

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.

A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

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:

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EiP to the benefit of the Inspector.

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

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



St Helens
Council

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Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm, Mag Lane, Lymm,	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature		13.3.19
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3. To which part of the Local Plan does this representation relate?									
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				SHLAA 2017					

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

Please tick as appropriate

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

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

Criteria 1

Policy LPA05 sets out that between 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. This is a decrease from

03

the previous preferred option consultation which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year.

Mulbury Warrington Ltd appreciates the Council has calculated the Objective Assessed Need (OAN) using the standard methodology for the period 2018-2028 by using the 2014-based household projections which subsequently identifies a figure of 482 dpa for the period. Whilst the SHMA update has 'sense checked' these against a number of economic scenarios, it is disappointing the overall requirement has only been marginally uplifted to 486 dpa. This approach is not ambitious and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the borough. Whilst the Council can opt for a different growth agenda to that set out in the Preferred Options, it is our firm view this Plan will not assist the borough in raising its profile or competing with neighbouring authorities such as Warrington. In this regard the Local Plan as written is backward step and it does not seek to maximise the opportunity for economic and social development within the borough.

Criteria 2

The policy states that the housing requirement will be met from:

- a) Completions;
- b) Sites with planning permission;
- c) Housing allocations shown on the Policies Map and listed in Table 4.5;
- d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and
- e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions / changes of use.

As set out in section 3 of our supporting representations and evidence, we have significant concerns with the content of the Council's 2017 SHLAA which should provide key evidence in relation to the capacity and deliverability of previously developed land. The published evidence within the 2017 SHLAA in relation to PDL is not up to date and the capacity and deliverability assumptions contained within it are overly optimistic.

The Council's assumptions on sites should be realistic based on evidence supported by the development industry who have relevant and up to date knowledge of the viability and deliverability prospects of such sites. Section 3 of our supporting representations provide evidence which concludes the assumed supply of housing on PDL is inaccurate.

The table below provides commentary on several larger sites which are identified as being capable of delivering residential development within the plan period. The table includes questions with regards to some of the assumptions which have been applied to each site and therefore if their inclusion has a realistic prospect of future development.

Large SHLAA sites

SHLAA Site Ref	Name	Capacity	Time frame	Comments
9	Moss Nook Urban Village	802	6-15 yrs	This site is also an identified housing allocation (Ref 10HA)

					<p>It is well documented this is a heavily contaminated Site that has been previously allocated for housing but has failed to deliver a single dwelling.</p> <p>There are around 14 known coal shafts and areas of shallow coal present within the centre of the site and northern boundary, along with an infilled reservoir and railway cuttings.</p> <p>The Site is in a low market value area which further adds to viability issues for this site given the very extensive remediation that would be required.</p> <p>We do not consider that the site will be fully developed within the plan period – we have seen no evidence to demonstrate the Site can be delivered and we consider it to be unrealistic this site will be developed within the forthcoming plan period.</p> <p>The site should not be subject to an allocation for a yield of 802 homes within 15 years.</p>
25	Alexandra Park (Former Pilkington HQ)	162	6-10 yrs		<p>There are significant contamination and ground condition issues associated with this site including shallow coal workings within most of the perceived developable area. There is a fundamental question as to whether this land is suitable for residential development at all based</p>

					on the information before us. Remediation costs will be significant and as with the Site at Moss Nook (Site Ref. 9) this is a low market value area and there is no evidence to support the viability and deliverability of this Site.
61	Land to north and south of Corporation Street	169	6-10 yrs		This Site has been vacant for many years. It is a difficult Site to develop and given ground conditions a high density development would be needed to provide 169 dwellings. This would need to be in the form of multi-storey apartments and it is clear from our market knowledge there is no market demand for this type of development in this location. As per previous comments for other Sites, there is no evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period.
78	Former St Helens Glass, Corporation Street	149	6-10 yrs		This is a heavily contaminated Site. There are also known issues with ground conditions including shallow coal workings. Remediation costs will be significant. Again there is a lack of evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period.
111	Land east of City Road, Cowley Hill	813	0-15yrs - 410 15 yrs + - 408		There are multiple seams of coal at shallow depth. The site has been extensively mined. Soft alluvial deposits are also present to the east of the site and therefore significant and costly foundations would be

				needed which is likely to have an adverse impact on site viability.
--	--	--	--	---

Based on the Sites highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged within the life-span of the emerging Local plan. In summary, the published evidence within the 2017 SHLAA in relation to PDL is not up to date and the capacity and deliverability assumptions contained within it are overly optimistic. The inclusion of these Sites within the Housing Land Supply are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development.

Allocated Sites

In addition, the capacity of sites proposed to be allocated within the plan period are also questionable. The table below sets out our commentary on this issue.

Allocated Site Ref	Name	Capacity	Time frame	Comments
2HA	Land at Florida Farm (South of A580)	522	Within Plan Period	<p>We understand that Site capacity has now reduced to 400 dwellings – the assumptions concerning capacity for this Site should therefore be reconsidered.</p> <p>As with all Sites in the East Lancashire Road corridor, there are very well known capacity issues at Junction 23 of the M6 motorway at Haydock which will restrict the level of growth in this corridor during the Plan period without very significant improvements at this location.</p>
4HA	Reginald Rd	2988	480 within plan period	<p>This is a new Allocation within this version of the Local Plan. No evidence has been put forward to demonstrate the deliverability credentials of this Site. There are known access issues with this Site and we would raise considerable</p>

				concerns regarding the locational sustainability credentials of this Site and whether it should be allocated at all. There is no evidence to demonstrate the Site could deliver 480 dwellings during the forthcoming plan period.
				<i>EPGC by contrast is in a highly sustainable location, could deliver up to 1,000 dwellings, including 300 affordable homes, and critically, the Site could easily be delivered prior to 2035.</i>
10HA	Moss Nook Urban Village	802	Within Plan Period	See comments above for SHLAA Ref 9.

Based on the sites highlighted above, we consider these Sites are unlikely to come forward within the plan period at the rates envisaged by the Council. This creates the need for additional allocations to meet the housing requirements set out in the Plan.

Safeguarded Sites

The table below provides some comments regarding two other safeguarded Sites where we are aware of issues that may affect their suitability for Safeguarding.

LPSD Ref	Name	Notional Capacity	Time frame	Comments
1HS	Land south of Leyland Green Rd, Garswood	291	Post 2035	We understand the current landowner does not support the release of the Site and does not wish for it to be developed for housing.
8HS	Land south of A580 between Houghtons Lane and Crantock Drive	1,027	Post 2035	We consider this Site to be significantly constrained by access. The Junction at Windle Island suffers from significant queuing during peak and off-

				peak times despite several highways schemes that have targeted a reduction in queuing traffic.
--	--	--	--	--

We consider there to be a need for further evidence to support the safeguarding of these Sites.

Please continue on a separate sheet if necessary

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	No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes , I wish to participate at the oral examination
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It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EIP to the benefit of the Inspector.

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St.Helens
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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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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Shaun
Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm, Mag Lane, Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature		13.3.19
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy	LPA06	Paragraph / diagram / table	Table 4.7 – 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				St Helen's Borough Local Plan 2020-2035 Green Belt Review (December 2018)				

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

Please tick as appropriate

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

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

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

The site is currently identified in the St Helens Borough Local Plan 2020-2035 Submissions Draft (January 2019) as 'Safeguarded Land' (reference 3HS) for residential purposes under Policy LPA06. Under this Policy the site would make available 49ha of land with a net developable area of 65% and the potential to deliver 956 dwelling units. Under this designation the site could only come forward following a future Local Plan review that proposes the development. Furthermore, Policy LPA06 will restrict the development of Safeguarded Land to beyond the Plan period (i.e. beyond 2035), which means that Eccleston Park Golf Club would not be able to come forward for any re-development before 2035, despite the golf club having been closed since 2018 because it is no longer viable.

Eccleston Park Golf Club is surrounded by built development and would provide a natural rounding of the settlement limits being contained by residential development to the west, south and north-east of the boundary of the site. The development of this site would not represent an incursion into open countryside unlike the other former Green Belt sites referred to above. The proposed safeguarding of the site in the Local Plan until after 2035 would effectively sterilise any development of the site in the interim, which would be contrary to the aims of national Government's policy contained in the NPPF where there is a presumption in favour of sustainable development. Given that the Golf Club has closed there is little future potential for the site with the restrictions put in place by Policy LPA06.

The accompanying Representations submitted on behalf of Mulbury Warrington Ltd provide evidence as to why this site is deliverable and also set out in greater detail why the current housing land supply identified by the council is outdated, inaccurate and overly optimistic.

The wording of Policy LPA06 Safeguarded Land is also considered unsound by virtue of it not being ineffective

Criteria 2 of the policy is written as follows:

"Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused."

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

Please continue on a separate sheet if necessary

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A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

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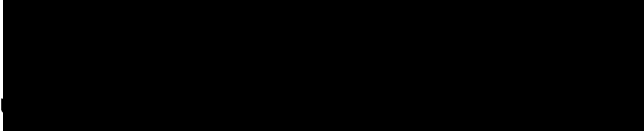
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Address: Great Oak Farm, Mag Lane, Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature		13.3.19
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Policy	LPC01	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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Whilst we support the main aims and objectives of Policy LPC01, there are insufficient Sites allocated to meet the housing requirement and therefore deliver the wide-ranging mix of housing set out in this policy. Without a suitable quantum and mix of housing Sites the aims and objectives of this policy will not be achieved. Our client's Site at Eccleston Park Golf Course

01

(Site Ref. 3HS) should be allocated for housing. This site would meet all of the aims and objectives that are set out in Policy LPC01.

Please continue on a separate sheet if necessary

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Allocate Site Ref. 3HS (Eccleston Park Golf Course) for housing. The site is of a scale that can deliver the mix of housing types set out in Policy LPC01, furthermore the Site is not constrained and is deliverable in the short term.

Please continue on a separate sheet if necessary

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Representations

on behalf of:

Mulbury (Warrington) Ltd

at

Eccleston Park Golf Course,

Eccleston, St Helens

March 2018



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Contents

1. Introduction.....	2
2. Site and Surrounding Area.....	4
3. Development Requirements, Spatial Strategy and Supply of Deliverable Land	5
4. Green Belt Review	12
5. Response to Identified Constraints	18
6. Benefits of Residential Developments	23
7. Summary and Conclusions.....	25
Appendix 1 – Site Location Plan	27
Appendix 2 – Green Belt Review – Extract 2018	28
Appendix 3 – Constraints Plan.....	29
Appendix 4 – Concept Masterplan	30



1. Introduction

- 1.1 These representations have been prepared on behalf of Mulbury (Warrington) Ltd in response to the St Helens Local Plan Submission Draft 2020-2035.
- 1.2 The representations relate specifically to Eccleston Park Golf Course Eccleston, from this point forward, referred to as 'The Site'. A site location plan is included at Appendix 1.
- 1.3 The Site is in a single ownership, owned by Mulbury (Warrington) Ltd having previously been promoted by Crown Golf during the earlier stages of St Helens Local Plan. The Site was previously allocated for residential development within the St Helens Preferred Options draft plan. These representations will provide additional evidence to demonstrate why the site should continue to be allocated for Housing in the emerging Plan.
- 1.4 These representations seek to provide specific comments on the following matters:
 - A review of the Council's evidence and assumptions into the deliverability of sites contained within the 2017 Strategic Housing Land Availability Assessment (SHLAA).
 - A response to the Council's conclusions within the Green Belt Review 2018 – specifically the constraints identified for the Site.
 - Additional information and commentary to demonstrate the deliverability of the Site including a summary of the technical investigations completed to date which include:
 - Highways
 - Flood Risk and Drainage
 - Ecology
 - Arboriculture
 - Landscape
 - Utilities
 - Ground Conditions
 - Heritage
 - Noise



- Air Quality

1.5 The remainder of this statement is structured as follows:

- **Section 2 - The Site and Surrounding Area** sets out the characteristics and locational benefits of the site.
- **Section 3 - Development Requirements, Spatial Strategy and Supply of Deliverable Land** – Questions the assumptions made in relation to future development sites
- **Section 4 – Green Belt Review** – responds to the conclusions and perceived constraints of the Site.
- **Section 5 – Response to Identified Constraints** – Responds to the perceived constraints of the site and how these have been addressed.
- **Section 6 – Benefits**
- **Section 7 - Summary and Conclusions** - draws out the information presented as part of this submission.



2. Site and Surrounding Area

- 2.1. The Site extends to an area of c48.3Ha site (excluding 0.5ha of existing residential development -18no. residential units located adjacent to the former club house). The Site is in single ownership and is available in its entirety for development. The former Golf Club ceased operation in June 2018 further to a period of dwindling Memberships. Further information is set out in the 'Golf Needs Assessment' which clearly demonstrates the factors that lead to the Course's closure and importantly concludes that further to the analysis of supply and demand, there is no case for the retention of the 18-hole members course at Eccleston Park Golf Course.
- 2.2. The site is bounded to the north by the Liverpool - Wigan mainline railway with Eccleston Park train station adjacent to the north west corner of the site. Residential properties surround the entire site.
- 2.3. The site is located close to two train stations (Eccleston Park and Rainhill) and is conveniently located near main roads and the motorway network. The site is capable of being easily integrated into the wider highway network and is adjacent to the St. Helen's Core Area to the east and the settlement of Rainhill (located outside of the Green Belt) to the south. The site benefits from being near a range of shops and services and a primary and secondary school. The site is well enclosed by natural landscaping and surrounded by development except for land to the north-east of the site.
- 2.4. Given the Site's location in an urban area where there are close links to public transport including two train stations, multiple bus services and wider services and facilities, this Site benefits from an optimum location for residential development.



3. Development Requirements, Spatial Strategy and Supply of Deliverable Land

- 3.1. The Submission Draft Local Plan Consultation is accompanied by several supporting documents and appendices. Having reviewed the evidence base documents including the 2019 Strategic Housing Market Assessment Update Report, Employment Land Needs Assessment and 2017 draft Strategic Housing and Employment Land Market Assessment, it is noted that St Helens have primarily derived its housing requirement using the Governments Standard Methodology.
- 3.2. The SHMA Update provides a series of economic based scenarios for household growth translated into annualised housing requirement. These range between 504-514 dwellings per annum under Economic Scenario 2, and 479 dwellings per annum under Economic Scenario 3. Further sensitivity options are provided in the analysis based on different employment sites not coming forward during the Plan period suggesting a potential range from 474-511 dwellings per annum for Scenario 2, and 459-476 dwellings per annum for Scenario 3.
- 3.3. Policy LPA05 sets out that between 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. This is a decrease from the previous preferred option consultation which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year.
- 3.4. Mulbury Warrington Ltd appreciates the Council has calculated the Objective Assessed Need (OAN) using the standard methodology for the period 2018-2028 by using the 2014-based household projections which subsequently identifies a figure of 482 dpa for the period. Whilst the SHMA update has 'sense checked' these against a number of economic scenarios, it is disappointing the overall requirement has only been marginally uplifted to 486 dpa. This approach is not ambitious and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the borough. Whilst the Council can opt for a different growth agenda to that set out in the Preferred Options, it is our firm view this Plan will not assist the borough in raising its profile or competing with neighbouring authorities such as Warrington. In this regard the Local Plan as written is backward step and it does not



seek to maximise the opportunity for economic and social development within the borough.

Spatial Strategy for meeting development needs

- 3.5. Policy LPA02 sets out the Spatial Strategy for the borough. The Policy is clear that growth in St Helens should be focussed within the Key Settlements. In addition, Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram) within the LPSD clearly indicates that Site Ref. 3HS is on the edge of the St Helens Core Area and is therefore a highly sustainable location for future housing development. Paragraph 4.68 further notes that “Land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements”.
- 3.6. We contend that residential development at Site 3HS is fully in accordance with Policy LPA02 as the site is clearly on the edge of the St Helens Core Area and in a highly sustainable location. The site can deliver a significant element of housing within the plan period (market and affordable homes) and should be allocated within the Local Plan rather than safeguarded – there are no deliverability issues associated with this Site. Whilst it may be reasonable to enable some new housing development to come forward in the outlying areas of the Borough, the Council has taken a disproportionate approach by not allocating the Eccleston Park Golf Course, given its better location and proximity to the urban core and its overall sustainability. For the reasons set out in section 5 of these representations, the site is sustainable, unconstrained and deliverable and should therefore be allocated to contribute towards the identified housing requirements.

Supply of Deliverable Land

- 3.7. Policy LPA05 seeks to meet housing needs in St Helens. During the period from 1 April 2016 to 31 March 2035, a minimum of 9,234 net additional dwellings should be provided in the Borough, at an annual average of at least 486 dwellings. It is understood that this will be met from:
- a) Completions;
 - b) Sites with planning permission;
 - c) Housing allocations shown on the Policies Map and listed in Table 4.5;
 - d) Sites without planning permission identified in the Strategic Housing Land



Availability Assessment (SHLAA); and

e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions / changes of use.

3.8. We have significant concerns with the content of the Council's 2017 SHLAA which should provide key evidence in relation to the capacity and deliverability of previously developed land. The Council's assumptions on sites should be realistic based on evidence supported by the development industry who have relevant and up to date knowledge of the viability and deliverability prospects of such sites.

3.9. The table below provides commentary on several larger sites which are identified as being capable of delivering residential development within the plan period. The table includes questions with regards to some of the assumptions which have been applied to each site and therefore if their inclusion has a realistic prospect of future development.

Large SHLAA sites

SHLAA Site Ref	Name	Capacity	Time frame	Comments
9	Moss Nook Urban Village	802	6-15 yrs	<p>This site is also an identified housing allocation (Ref 10HA)</p> <p>It is well documented this is a heavily contaminated Site that has been previously allocated for housing but has failed to deliver a single dwelling.</p> <p>There are around 14 known coal shafts and areas of shallow coal present within the centre of the site and northern boundary, along with an infilled reservoir and railway cuttings.</p> <p>The Site is in a low market value area which further adds to viability issues for this site given the very extensive remediation that would be required.</p>



SHLAA Site Ref	Name	Capacity	Time frame	Comments
				We do not consider that the site will be fully developed within the plan period – we have seen no evidence to demonstrate the Site can be delivered and we consider it to be unrealistic this site will be developed within the forthcoming plan period. The site should not be subject to an allocation for a yield of 802 homes within 15 years.
25	Alexandra Park (Former Pilkington HQ)	162	6-10 yrs	There are significant contamination and ground condition issues associated with this site including shallow coal workings within most of the perceived developable area. There is a fundamental question as to whether this land is suitable for residential development at all based on the information before us. Remediation costs will be significant and as with the Site at Moss Nook (Site Ref. 9) this is a low market value area and there is no evidence to support the viability and deliverability of this Site.
61	Land to north and south of Corporation Street	169	6-10 yrs	This Site has been vacant for many years. It is a difficult Site to develop and given ground conditions a high density development would be needed to provide 169 dwellings. This would need to be in the form of multi-storey apartments and it is clear from our market knowledge there is no market demand for this type of development in this location. As per previous comments for other Sites, there is no evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period.
78	Former St Helens Glass,	149	6-10 yrs	This is a heavily contaminated Site. There are also known issues with ground conditions including



SHLAA Site Ref	Name	Capacity	Time frame	Comments
	Corporation Street			shallow coal workings. Remediation costs will be significant. Again there is a lack of evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period.
111	Land east of City Road, Cowley Hill	813	0-15yrs - 410 15 yrs + -408	There are multiple seams of coal at shallow depth. The site has been extensively mined. Soft alluvial deposits are also present to the east of the site and therefore significant and costly foundations would be needed which is likely to have an adverse impact on site viability.

- 3.10. Based on the Sites highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged within the life-span of the emerging Local plan. In summary, the published evidence within the 2017 SHLAA in relation to PDL is not up to date and the capacity and deliverability assumptions contained within it are overly optimistic. The inclusion of these Sites within the Housing Land Supply are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development.

Allocated Sites

- 3.11. In addition, the capacity of sites proposed to be allocated within the plan period are also questionable. The table below sets out our commentary on this issue.

Allocated Site Ref	Name	Capacity	Time frame	Comments
2HA	Land at Florida Farm (South of A580)	522	Within Plan Period	We understand that Site capacity has now reduced to 400 dwellings – the assumptions concerning capacity for this Site should therefore be reconsidered. As with all Sites in the East Lancashire Road corridor, there are very well known



				capacity issues at Junction 23 of the M6 motorway at Haydock which will restrict the level of growth in this corridor during the Plan period without very significant improvements at this location.
4HA	Reginald Rd	2988	480 within plan period	This is a new Allocation within this version of the Local Plan. No evidence has been put forward to demonstrate the deliverability credentials of this Site. There are known access issues with this Site and we would raise considerable concerns regarding the locational sustainability credentials of this Site and whether it should be allocated at all. There is no evidence to demonstrate the Site could deliver 480 dwellings during the forthcoming plan period. <i>EPGC by contrast is in a highly sustainable location, could deliver up to 1,000 dwellings, including 300 affordable homes, and critically, the Site could easily be delivered prior to 2035.</i>
10HA	Moss Nook Urban Village	802	Within Plan Period	See comments above for SHLAA Ref 9.

- 3.12. Based on the sites highlighted above, we consider these Sites are unlikely to come forward within the plan period at the rates envisaged by the Council. This creates the need for additional allocations to meet the housing requirements set out in the Plan.

Safeguarded Sites

- 3.13. The table below provides some comments regarding two other safeguarded Sites where we are aware of issues that may affect their suitability for Safeguarding.

LPSD Ref	Name	Notional Capacity	Time frame	Comments
1HS	Land south of Leyland Green Rd, Garswood	291	Post 2035	We understand the current landowner does not support the release of the Site and



				does not wish for it to be developed for housing.
8HS	Land south of A580 between Houghtons Lane and Crantock Drive	1,027	Post 2035	We consider this Site to be significantly constrained by access. The Junction at Windle Island suffers from significant queuing during peak and off-peak times despite several highways schemes that have targeted a reduction in queuing traffic.

- 3.14. We consider there to be a need for further evidence to support the safeguarding of these Sites.



4. Green Belt Review

Draft Green Belt Review 2016

- 4.1. An initial draft Green Belt Review was undertaken in 2016 to support the Local Plan Preferred Options Consultation. The Study undertook an assessment on the relative performance of the Green Belt, by splitting it into parcels of land and assessing them against the five purposes of the Green Belt as set out in National Policy.
- 4.2. Following the Green Belt parcel assessment, a further review was undertaken of Green Belt sites that were promoted through the Call for Sites consultation. This considered the development potential for of each of the sites, considering, site specific constraints such as flood risk, ecology and access, as well as the performance of the Green Belt parcel in which it is contained.
- 4.3. The Green Belt assessment and review was integral to the Local Plan preparation process and its purpose was to identify areas where development could be accommodated without harming the fundamental aims of national Green Belt policy as set out in the NPPF.
- 4.4. Eccleston Park Golf Course was reviewed as part of this process (Reference GBS_044)
- 4.5. The overall conclusion of the 2016 assessment noted that the *“Site located in very sustainable location. Green Belt parcel is of moderate significance as the settlement has already merged and it is well contained. Site capacity would depend on highways access and traffic impacts”*.
- 4.6. Subsequently the site was promoted for allocation. A copy of the initial Green Belt Review of our Clients Site is Contained in Appendix 2.

Green Belt Review 2018

- 4.7. In 2018, an updated Green Belt Review was published to accompany the Submission Draft Local Plan.
- 4.8. When comparing the results of the two assessments (set out in the table below) it is apparent that EPGC is assessed more favourably in relation to Purpose 2. The reason



for this is provided in the table on page 383 of the 2018 Green Belt Review and explains that the 'green belt gap' in which the Site is located has already been significantly reduced due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground.

- 4.9. We emphatically agree that given the strong boundaries around the parcel, it provides only a weak role in preventing further merging. The conclusion in the Review, there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location is strongly supported.

	2016 Review	2018 Review
GB Reference	GBS_044	GBP_087
Stage 1b Scores		
Purpose 1 Check the unrestricted sprawl of large built-up areas	Low	Low
Purpose 2 Prevent neighbouring towns merging into one another	Medium	Low
Purpose 3 Assist in safeguarding the countryside from encroachment	Low	Low
Overall Score	Low	Low

- 4.10. The overall score for the site continues to make little contribution to the purposes of the Green Belt.

Conclusions of GB Review (Reference GBP_087) Eccleston Park Golf Club

- 4.11. Table 5.4 within the 2018 Green Belt Assessment provides the comments and justification as to why sites have been allocated, safeguarded or discounted.



4.12. Pages 117-119 of the GB Review (2018) provide the conclusions in relation to our clients site. The table below sets our response to the published conclusions.

St Helens Council Conclusion	Response
There are a number of constraints which would have a significant impact on overall NDA and deliverability of development.	The Council fails to provide any detail or evidence regarding the constraints that are said to have a significant impact on NDA and the deliverability of this Site. This matter is considered in greater detail at Section 5 of these representations.
Parcel constitutes a major area of mainly greenfield land, its release for development and timing would need to be clearly justified in the light of the Council's objective of making efficient use of PDL to meet development needs.	The Council's objective of making efficient use of PDL to meet development needs is acknowledged but as set out in more detail in section 3 of these representations, the Council's evidence base is out of date and delivery assumptions and capacity for previously developed sites are highly questionable. Furthermore, other Greenfield Greenbelt Sites have been allocated for residential development, as such the arguments advanced by this conclusion are fundamentally flawed.
Parcel has good levels of accessibility to service and public transport etc Scope to improve facilities at the adjacent railway station by provision of car parking	We agree the site is highly sustainable and accessible. The Site offers the opportunity to provide parking for the adjacent Railway Station (Eccleston Park).
Substantial constraint is the golf course. This is a valued recreational facility. National policy seeks to protect it. At LPPO stage, Sport England objected to the allocation of the site for housing.	The golf club closed in Summer 2018 and the site is not accessible to the public. A Golf Needs Assessment has been undertaken by WYG. This clearly illustrates that the loss of this facility is



St Helens Council Conclusion	Response
Further evidence has not been obtained, meaning that the allocation would conflict with national policy	not detrimental to the recreational amenity of the borough. It should be noted that remaining Members from EPGC have now found new facilities. With the completion of Golf Needs Assessment, the Site Owner is now engaging with Sport England concerning the circumstances of this Site.
Constraint of the highway network- Number of junctions in the area experience capacity issues that are likely to be difficult to improve practicably or economically	A detailed Transport Assessment has been completed over the last 12 months, the scope of which has been agreed with St Helens Council and Knowsley Council (as neighbouring authority). The findings of the TA do not concur with the view held by the Council.
Knowsley Council (Highways Authority) objected to the allocation at LPPO stage. Constraints are considered likely, in absence of evidence to the contrary, to at least substantially limit the residential capacity of this large parcel.	Knowsley Council has not submitted any evidence that we are aware of to substantiate these assertions. To the contrary, the TA that we have prepared confirms the Site could accommodate up to 1,000 dwellings.
Number of physical constraints eg Pylons/ railway line adjacent to the site. Appropriate buffer zones would be required to protect residential amenity. This would reduce NDA	Substantial investigations have been completed by the Site Owner. A constraints plan is included at Appendix 3. This clearly demonstrates the impact of the constraints referred to by the Council. Appropriate buffer zones and wayleaves can be accommodated within this site whilst still supporting up to 1,000 dwellings. See section 5.
Buffer required to protect woodland This would reduce NDA	Any future Masterplan for this Site could easily incorporate these buffer zones and



St Helens Council Conclusion	Response
	it need not affect the NDA beyond what we are already aware of / accommodating.
UU has advised that a number of major infrastructure assets run through the parcel. This would reduce NDA.	The Site owner is fully aware of the assets that pass under this Site. Detailed work has been undertaken (in conjunction with UU) to establish the detailed routing and depths of these assets. Whilst the NDA is reduced by these assets, the constraints plan demonstrates that up to 1,000 dwellings can be achieved from this Site. See section 5.
The 2018 SA assessed the parcel and concluded that development within it would have a positive impact on the achievement of a number of SA objectives	We welcome this and further argue that the site is highly sustainable, accessible, provides no contribution/purpose to the Green Belt. The site is wholly appropriate to be allocated for development within the plan period.
The parcel is considered suitable for removal from the Green Belt but more evidence is needed to justify the loss of the former golf club and to ascertain the contribution the parcel can make to meeting housing needs. Therefore, this parcel is not required to meet the needs within the plan period and is now safeguarded rather than allocated.	We agree that the parcel is suitable for removal from the Green Belt. Evidence has been prepared to justify the loss of the golf club in the Golf Needs Assessment. This information will be made available to the Council. The site is capable of meeting housing needs and should be allocated for development in the plan period.

4.13. It is clearly evident from the above the issues raised by the Council in relation to EPGC are outdated and do not properly reflect the circumstances for this Site. We have clearly demonstrated the suitability of the Site for allocation. Indeed, the very many



positive attributes of this Site place it in a stronger position compared with many of the PDL Sites and Allocations the Council relies on to meet its housing requirements.



5. Response to Identified Constraints

Eccleston Park Golf Club site was previously proposed by the Council as an allocated site for residential development (reference HA8) at the Local Plan Preferred Options stage in December 2016. As set out in the previous section, the Green Belt Review highlights a number of perceived constraints, however, these are unsubstantiated and not correctly balanced against the planning merit of bringing forward the site for development when compared against other sites which have been taken forward as allocations in the current Local Plan period or those PDL Sites presumed to be deliverable. Site 3HS - Eccleston Park Golf Course is 'deliverable' and 'developable' within the meaning of the NPPF, as it is available now for development having been closed as a golf club since mid-2018. This section provides additional information and evidence on how the various constraints can be overcome.

Highways

- 5.1. The TA considers a proposed development of up to 1,000 residential units. Access to the site will be provided via new priority junctions, Portico Lane and Two Butt Lane with the existing access from Rainhill Road being modified to accommodate larger vehicles.
- 5.2. An assessment of accessibility by walking, cycling, and public transport has been undertaken. The site is located adjacent to numerous well served bus stops and Eccleston and Rainhill Railway Stations. There will be a choice of sustainable travel options available to future residents and an enhancement of access by active travel from existing residential areas to rail stations through the development of this site.
- 5.3. A separate travel plan framework has been prepared which includes further recommendations for promoting sustainable travel at the development site.
- 5.4. Detailed impact assessment using computer modelling has been undertaken at the following highway locations:
 - Site Access/ Portico Lane;
 - Site Access/ Rainhill Road;
 - Rainhill Road / Elton Head Road;
 - Delph Lane / Scotchbarn Lane / Two Butt Lane;
 - Portico Lane / Old Lane;
 - A58 St Helens Road / Portico Lane;



- A57 Warrington Road / Rainhill Road;
- Nutgrove Road / Elephant Lane;
- Two Butt Lane / Holt Lane; and
- Holt Lane / Warrington Road.

5.5. The assessments show that the site access junctions will operate within their design capacity. Impact assessments at the other major junctions considered demonstrates that the development will have a marginal impact on the operation of these junctions. Although many of these junctions are predicted to be busy in the future (taking account of committed development) the junction modelling demonstrates that the change in junction operation at these locations as a result of the proposed development will not be severe. Where the development has had a significant impact on the junctions' performance mitigation measures have been identified.

Physical Constraints: 400kV Overhead Line and Water Mains

5.6. An investigation undertaken by BTS Surveyors has assessed the capability of delivering residential development if the overhead lines and water mains are retained. The report has assumed the capacity of the site as up to 1000 dwellings and clearly concludes that net developable area would not be compromised due to the overhead line and water mains, as per the Parameters Plan at Appendix 3.

400kV Overhead Line

5.7. The report acknowledges that due to the restriction on the overhead line, it will not be possible to place any form of building underneath, however due to the clearance distances provided by National Grid it will be possible to place Public Open Space, SUDS and roadways directly underneath the overhead line.

Water Mains

5.8. The report acknowledges that due to the restriction on the mains, it will not be possible to construct buildings over the mains however it is clear from the Conveyance that roadways and other utilities can be installed at a ninety-degree angle to the pipe, as demonstrated by the concept Masterplan (see Appendix 4). It will also be suitable to place Public Open Space, and potentially SUDS above the main.



- 5.9. Trial holes have been undertaken to ascertain the exact location and depths of the 72 inch main. The trial holes were dug to a depth of 2.5m and the main had not been reached so this is more than sufficient for any level changes, service and road crossings over the main. This was undertaken in the presence of the asset owner, United Utilities who have confirmed that roadways above the main are feasible upon providing a design showing *“the level of the crown of the water main, proposed level of the roadway and the construction of the protection and the roadway ensuring that it will disperse loading so not more than 8.5kN/m² in transmitted onto the 72” main.”*
- 5.10. In summary, soft landscaping, POS, SUDS, footpaths and roads can all be built within the overhead line corridor and the water main corridors. As the development will have to provide a minimum provision of open space, SUDS and infrastructure, these green corridors would be best used to serve the development.

Golf course provision in the Borough

- 5.11. The key constraint identified by the Council to bringing forward the Eccleston Park Golf Course is the Sites former use as a Golf Course and the outstanding objection from Sport England. The Golf Club Needs Assessment considers supply and demand in detail and clearly concludes there is no justification for the retention of the Golf Course.

Environmental Constraints

Flood Risk and Drainage

- 5.12. A Flood Risk and Drainage Review has been undertaken by Mott MacDonald. This confirms that the site is in Flood Zone 1 and that the risk of flooding on the site is low. Furthermore, it confirms that surface water can be appropriately managed on site.

Landscape and Visual Impact

- 5.13. The site is not subject to any formal landscape designations. Whilst the development will result in a change to the local landscape (given there would be an intensification of development on site compared with the current use as a golf course), the development proposals would sit comfortably given the surrounding residential properties.

Ecology & Arboriculture



- 5.14. A Phase 1 Habitat Survey has been undertaken for the site. The survey provides the baseline conditions for the site which concluded the need for GCN, Bat and Surveys. Surveys undertaken during 2018 have confirmed GCN are not present. The Site is enclosed by typical landscape character features which include small mature woodland blocks (northeast of Wedgewood Gardens); mature trees (surrounding the application site and along Rainhill Road); avenues and remnants of former avenue tree planting; areas of semi-natural planting (east and west of Rainhill Road). The lack of suitable habitat and significant on-site trees that could be impacted by any development is minimal.

Archaeology and Heritage

- 5.15. There are no registered World Heritage Sites, Archaeological Areas, Scheduled Ancient Monuments, Conservation Areas, Registered Parks and Gardens, Registered Battlefields wholly or partly within the Assessment Area. The site does not therefore contain any designated heritage assets for which there would be a presumption in favour of preservation in situ and against development.

Noise

- 5.16. A full acoustic survey has been completed for this site. The acoustic survey concludes that noise incident on the proposed development consists of distant traffic noise. The assessment has identified mitigation measures that would ensure suitable internal noise conditions for future residents. Such mitigation measures include appropriate glazing and the use of trickle vents. In terms of outdoor noise, the development has been designed in such a way that noise in external amenity areas will be as low as practicably possible and well within the required standards.

Air Quality

- 5.17. The site does not fall within any air quality designation. The greatest impact of the proposed development in air quality terms will be from emissions from increased traffic movements. A full Air Quality Assessment is currently being prepared.

Conclusion

- 5.18. The matters raised by the Council and other consultees have been addressed by the various technical investigations listed above. There are no planning grounds that



support the change in the allocation status of this Site from the Preferred Options Plan to that before us now.



6. Benefits of Residential Developments

- 6.1. It is a long established principle that residential development can deliver far reaching economic and social benefits. The Site has the ability to deliver multiple benefits as set out below.

Affordable Housing

- 6.2. The proposed development seeks to provide 30% affordable housing (which in the case of this site, equates to around 300 dwellings). The level of affordable housing proposed reflects the requirements set out in the emerging Local Plan.
- 6.3. In terms of delivery, there is significant interest from a number of housebuilders and the landowner is currently advancing these discussions. Given the size of the site coupled with the knowledge of the Site from a technical perspective, the site could be easily delivered within the Plan period, with at least 400 dwellings be delivered in years 1-5. The site would make a very significant contribution towards meeting the need for market affordable homes in St Helens.

Extra Care Housing

- 5.1 The Site would also be capable of delivering much needed mainstream care and/or extra care housing and independent living options. Increasing this type of provision is a clear aim of policy LPC01.

Other Benefits

- 5.2 In addition to the benefit of providing a housing scheme there are also numerous other benefits that would arise from the residential development.
- Capital Investment and Expenditure Benefits: this relates to the value of capital investment and expenditure generated by the industry on new land for housing development;
 - Construction Benefits: this relates to the impacts of this capital investment on construction employment and associated income generation and economic output during the construction of housing;



- Direct Employment Benefits: the number of people employed directly by house builders and their contractors, as well as the levels of economic output generated by these jobs;
- Indirect and Induced Employment Benefits: further jobs supported in the wider economy in house building supply chains and by spending amongst direct and supply chain employees on goods and services;
- Resident Expenditure Benefits: level of expenditure generated by residents of new housing development;
- Public Finances: contribution through tax revenues generated by house builders and their supply chain;
- Local Authority Revenue Benefits: the benefits that house building development brings in terms of local authority financial receipts from New Homes Bonus and Council Tax;
- Local Community Benefits: financial contributions made by house building to fund new facilities, services and infrastructure for local communities.

5.3 More specifically, based on the House Builders Federation Housing Calculator, the development of 1000 homes is estimated to:

- Support the employment of 3,100 people;
- Increase open space, community sport, leisure spending by £806,200 which could for example provide 45 x 5 a side football pitches;
- Generate £806,200 towards education spending which could provide up to 380 classroom spaces;
- Generate £12,053,000 in tax revenue, including £1,129,460 in council tax revenue.



7. Summary and Conclusions

- 7.1. These representations have identified the Council's evidence base in relation to PDL is outdated and inaccurate. Assumptions are unrealistic, therefore the delivery of the housing requirement is in jeopardy.
- 7.2. It is clear from these representations the available supply of existing PDL in the urban area is unlikely to come forward as expected and therefore more sites are required to be allocated for development. Those Sites currently identified as Safeguarded that score highly (such as EPGC) should be allocated for housing in the forthcoming Plan period.
- 7.3. Our clients site continues to be a sound choice to be allocated for development within the plan period as it was in the previous LPP0. The Council has not provided any evidence for their change in position. Additional evidence has been provided as part of these representations to address the constraints and concerns highlighted by the Council in their evidence, mainly the Green Belt Review 2018. The site is deliverable and can contribute promptly to providing much needed housing in St Helens. A number of benefits will also be brought to the borough as a result.
- 7.4. Mulbury are an experienced developer with a proven track record delivering complex sites for market and affordable housing and varying forms of care uses. As highlighted earlier in these representations, Mulbury are currently in detailed discussions with two major housebuilders and a number of Registered Providers (regarding the affordable requirement) with a view to accelerated housing delivery from this Site, this would include the early delivery of Affordable Housing. This Site therefore offers the opportunity to make a very significant contribution to the five-year housing land supply.
- 7.5. Turning to benefits associated with housing developments, it is accepted that all residential developments can deliver various benefits, however, only those Sites that are truly deliverable will provide these benefits. Our clients Site is available now and capable of very early delivery, therefore securing the multiple benefits set out in these representations.



- 7.6. We politely request the Council to review the new and additional evidence submitted as part of this representation which demonstrates the site can be delivered in the plan period and the site should be reinstated as an allocation. The Site owners would welcome the opportunity for further dialogue with the Council in this regard.



Appendix 1 – Site Location Plan

Key

Site Location



e*SCAPE

u r b a n i s t s

Project Title

Land at Eccleston Park, St Helens

e*SCAPE Job No

017-031

Client

Mulbury Warrington Ltd

Drawing Number

017-031-P001

Revision

REV B

Drawing Title

Site Location Plan

Scale

1:2,500 @ A2

Date

January '19

0m 20m 40m 60m 80m 100m

Scale 1:2,500 (@A2)

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nORTH



Appendix 2 – Green Belt Review – Extract 2018

Parcel/Sub-parcel ref. and location	Allocate, safeguard or discount	Comments on decision
GBP_087 Eccleston Park Golf Club	Safeguarded	<p>The parcel consists of the former Eccleston Park Golf Course, north of Rainhill, east of Eccleston Park. The golf course was in use until summer 2018.</p> <p>Although the sub-parcel was proposed by the Council as an allocated site at the LPP0 stage, a number of constraints affect it that would have a significant impact on its overall NDA and the deliverability of development within it. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this sub-parcel.</p> <p>Although the parcel is of substantial size, and has open views across it, it is also reasonably well contained by existing housing to the south, west and north-east and a railway line to the north. Whilst the parcel lies between a number of built up areas, it is not considered to form part of a strategic gap in Green Belt policy terms. This is because the 'gap' has already been compromised by existing development in the Eccleston Park and Nutgrove areas. The parcel does however constitute a major area of mainly greenfield land. Its release for development, and the timing of its development, would therefore need to be clearly justified in the light of the Council's objective of making efficient use of previously developed land to meet development needs.</p> <p>The parcel has good levels of accessibility to a range of services, jobs and public transport (including Eccleston Park railway station, which is immediately adjacent to the parcel). There is scope to improve facilities at the adjacent railway station by the provision of car parking within the parcel.</p> <p>One substantial constraint affecting the parcel relates to its golf course use. This provided a</p>

Parcel/Sub-parcel ref. and location	Allocate, safeguard or discount	Comments on decision
		<p>valued recreational facility to the local community over a number of years, and national planning policy requires that existing sports facilities should not be lost through new development except (amongst other exceptions) where the sporting facility has been clearly demonstrated to be surplus to requirements. At LPP0 stage, Sport England objected to the allocation of the site for housing (proposed at that stage) on the basis that insufficient evidence concerning sporting needs had been provided. Whilst the golf course closed in summer 2018, there are a number of other golf courses in St.Helens and the Council did publish some evidence relating to this matter at LPP0 stage, these points do not preclude the need for further evidence to be brought forward to meet the requirements of Sport England. This further evidence has not been obtained, meaning that the allocation of the site at present would conflict with national policy protecting sporting facilities from loss through new development.</p> <p>A further constraint relates to the highway network in the surrounding area (both within St.Helens and in the neighbouring Knowsley Borough). A number of junctions in the area already experience capacity issues that are likely to be difficult to improve practicably or economically. In response to consultation at the LPP0 stage, Knowsley Council (the relevant highway authority for some of the affected highways) raised objections to the allocation of the site. These constraints are considered likely, in the absence of evidence to the contrary, to at least substantially limit the residential capacity of this large parcel.</p> <p>In addition a number of physical constraints exist within the parcel itself. These include a number of large electricity pylons that run through the parcel, alongside which a buffer would need to be provided to ensure satisfactory levels of amenity for occupiers of any new housing. An appropriate buffer zone would also need to be provided alongside the adjacent railway line to</p>

Parcel/Sub-parcel ref. and location	Allocate, safeguard or discount	Comments on decision
		<p>reduce the potential noise impact on occupiers of future dwellings within the parcel. A further buffer would be needed to protect the woodland to the north of the parcel. UU has also advised that a number of other major infrastructure assets run through the parcel including: various sewers; a trunk water main; the North Prescott Aqueduct; and Vyrnwy Aqueduct/pumping station.</p> <p>These physical constraints serve (particularly when viewed in combination) to fragment the developable areas within the parcel, thereby substantially limiting its NDA.</p> <p>The 2018 SA assessed the parcel and concluded that development within it would have a positive impact on the achievement of a number of SA objectives.</p> <p>In summary, the parcel is considered suitable for removal from the Green Belt. However, further evidence is needed to justify the loss of the former golf course and to ascertain the contribution that the parcel can realistically make to meeting housing needs. For these reasons, and as the development of the parcel is not required to meet housing needs within the Plan period, the parcel is now recommended for safeguarding rather than allocation.</p>
GBP_089 Land north of the M62 and south of Mill Lane, Rainhill	Discounted	<p>This parcel is located to the south of Rainhill.</p> <p>Although the parcel was proposed by the Council as a safeguarded site at the LPP0 stage, a number of constraints affect it that would have a significant impact on the NDA and the deliverability of development within it. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this parcel.</p>



Appendix 3 – Constraints Plan

Key

	Ownership Boundary		Sensitive Residential Interface
	Overhead Power Lines (275kV) (27.9m Easement)		United Utilities Combined Sewer (Easements unknown)
	Native Hedgerow		Treated Water Main (14m Easement) (30m Easement)
	Waterbodies/watercourse L (Low value)		United Utilities Surface Water Sewer (Easement unknown)
	Existing Trees/Vegetation		United Utilities Foul Water Sewer (Easement unknown)
	Railway Line		United Utilities Potable Water
	Proposed Site Access		Surface Water Outfall from reservoir
	Potential Pedestrian Access		Existing Footpaths (Permissive & Definitive)
	Eccleston Park Train Station		Existing Buildings
	Existing Green Infrastructure Bus Stops		Slope
	Potential Pedestrian Connections		Potential Green Link
			Noise Source (Offset Required)

e*SCAPE

u r b a n i s t s

Project Title

Land at Eccleston Park, St Helens

e*SCAPE Job No.

017-031

Client

Mulberry Homes

Drawing Number

017-031-P002

Revision

REV -

Drawing Title

Constraints & Opportunities

Scale

1:2,500 @ A2

Date

Dec 17





Appendix 4 – Concept Masterplan

**Eccleston Park Golf Course
Accommodation Schedule:**

Site Area: 49.09 hectares
Green Infrastructure: 16.82 hectares
Net developable: 32.36 hectares
Number of Homes: 1000 homes
Net Density: 31 units/ha
Gross Density: 20 units/ha

Key

Site Boundary

Existing Trees

Existing Hedgerows

Existing Ponds

Existing Watercourses

Existing Footpaths
(Permissive &
Definitive)

Green Infrastructure

Proposed Trees
(Illustrative)

Development Parcels

Avenues

Streets

Lanes

Shared Drives

Squares & Mews
(Shared Space)

Proposed Leisure
Footpaths

Gateways

Landmarks

n*ORTH

0m 20m 40m 60m 80m 100m

Scale 1:2,500 (@A2)

Ordnance Survey © Crown copyright 2018.
All rights reserved. Licence number LIG1024

e*SCAPE

urbanists

Project Title

Land at Eccleston Park, St Helens

e*SCAPE Job No.

017-031

Client

Mulbury Homes

Drawing Number

017-031-P003

Revision

REV C

Drawing Title

Parameters Plan

Scale

1:2,500 @ A2

Date

September '18

RO0226

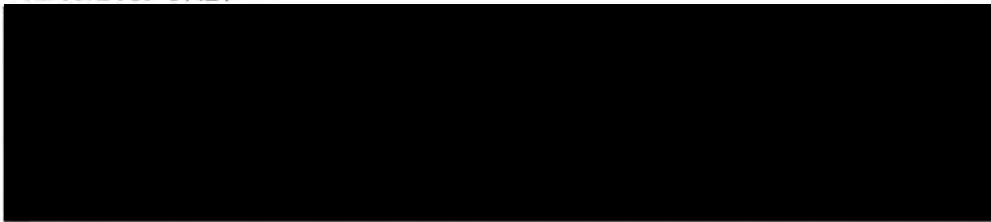
Sinc 2ES
(Haydock Point)

Page 1 of 1
ELO113

① - LPA06



Objection to St Helens Local Plan
Joan Brown
to:
planningpolicy@sthelens.gov.uk
12/03/2019 17:27



Thank you for your letters of the 15th and 25th of January informing me of the proposals for future developments of land near my property.

When the proposal for the development of the land at Haydock point was first made I attended a meeting at Haydock Park and subsequently read all the reports from the various agencies regarding the environmental impact of such a development. I felt then that the proposals were going to have a huge detrimental effect on the quality of my life and therefore expressed my objections in writing to your department. ✓

My objections are mainly based on the increase in traffic in an already congested area and the impact that will have for future generations. The high pollution in this area already affects the health of the residents here [redacted] There are 3 schools within a short distance from this proposed development and many of the pupils have to travel through the affected area daily. There are frequent hold-ups around Haydock Island now and these are increased when there are race meetings at Haydock Park. We are now enduring further disruption whilst the road works are carried out to accommodate the new units that are being erected adjacent to the M6/Penny Lane. ①

A further objection of mine is the destruction of green belt. There has been a gradual erosion of open spaces throughout the area and we need to safeguard these areas. We are all being encouraged to walk more to prevent obesity but soon there will be nowhere to walk to. I am also aware that there are already several empty units on Industrial Estates around the area and my concern is that these new proposals could also end up with some units standing empty and becoming an eyesore.

I do appreciate that St Helens Council needs to maximise its revenue but I do feel these issues need to be looked at on a wider scale ✓

My original objections to this plan still stands and I hope you will take them into consideration

Joan Brown
14 Newlyn Drive
Ashton-in-Makerfield

Sent from [Mail](#) for Windows 10

RO0227

ELO116

SITE PHA

①-LPA05



Representation against the revised St Helens Local Plan (SHLP)
 Julie Brown
 to:
 planningpolicy
 12/03/2019 17:40



From: Julie Brown, 32 Heyes Avenue, Rainford, WA11 8AR

Dear Sir/Madam

I wish to make representation against the revised St Helens Local Plan (SHLP) to build houses - specifically the building of 259 houses on HA8 (Rookery Lane) in Rainford.

The proposal is to build houses on grade 1 agricultural land which is currently actively farmed and provides necessary employment. Given the issues that brexit will cause (regardless of whether a deal is reached or not) the UK will need to become more self-reliant for food production. Destroying this agricultural land will not help this situation but rather make it worse. I am not aware that any consultation with Natural England regarding the loss of important agricultural land has taken place to date.

There is no mention of plans to improve the infrastructure around where these houses are planned. There is no provision for more school places or medical services. It is difficult enough to get a doctor's appointment currently. More households will only exacerbate this problem.

The increase in traffic this will cause will create problems in the village and surrounding roads. The current traffic improvements at Windle Island show that this will be a problem because the traffic has increased on higher lane and blind foot road and this is destroying the road surface on these roads so by the time the improvements are finished at Windle island, it will be necessary to repair these roads too. And the increased traffic which the creation of these houses will cause, will negate the necessary improvements which are in the process of being made at Windle island.

The proposed houses are to be built close to an industrial area with all the risks that this brings such as pollution and possible explosion. I understand that other sites have been excluded for this very reason, so I do not understand why this hasn't.

The council should consider whether there are more appropriate Brownfield sites which could be used in preference to using green belt land. Utilising these would have less negative impacts on the environment. Additionally, has it actually been established that these houses are necessary? Are there not existing houses standing empty which could be improved? I appreciate that there is an apparent housing shortage in the UK, but I question whether the proposed houses will actually be "affordable" housing for the people who need them most.

Kind regards

Julie Brown

RO0228



St. Helens
Council

659

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

Ref: LPSD

13 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

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: Ian	First name:
Last Name: Brown	Last Name:
Organisation/company:	Organisation/company:
Address: 20, Stonecross Drive, Rainhill, Prescot, Merseyside. Postcode: L35 6DD	Address:
	Postcode:
	Tel No:
	Mobile No:
	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 future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
<p>Let me be clear. I am against any development on greenbelt, or removal of land from greenbelt, until ALL brownfield land has been developed first. St Helens Council repeatedly states that it has a 'brownfield first' policy. Why then is 6% of St Helens greenbelt earmarked for development. NPPF 2018 states that there must be exceptional circumstances before greenbelt is built upon. There are NO exceptional circumstances described within these local plan documents.</p>

The following are all reasons which, in my opinion, should facilitate Eccleston Park Golf Club, 3HS, retaining its greenbelt status and not being relabelled safeguarded land i.e. reserved for development.

- Sport England is a statutory government consultee. It objected at local plan stage 1 to EPGC status being changed from golf club. This objection has not yet been answered or resolved. Any objection from a statutory consultee must be resolved or upheld. St Helens Council must provide compelling evidence that there is an over subscription of golf within the local area to enable the land to be reclassified. They have thus far failed to do this.
- Highways - both the Warrington Rd/ Rainhill Rd (Skew Bridge) junction, and the Portico Lane / Prescott Rd junction are confirmed, by council officers, to be at full capacity. Major works would have to be undertaken at these junctions to facilitate extra traffic. There is very little, if any scope, at the Skew Bridge.
- EPGC, whilst inactive at present, is still a golf course and maintained as such. In all of St Helens Councils documentation it is referred to as a former golf club. This is misleading for the planning inspectors. It is still a golf course, just not active at present.
- Recent traffic events, such as the link road roundabout works, along with the recent Longton Lane upgrade, both served to demonstrate that Rainhills roads cannot cope with an increase in traffic flow. Throughout the duration of these works Rainhills roads were gridlocked on a regular basis.
- The land at 3HS is the natural green buffer that separates Whiston, Portico, Eccleston Park, Nutgrove, Thatto Heath and Rainhill, if this were to be removed from greenbelt and reclassified as safeguarded (built on in as little as 3 years) it would create a continuous area of urban dwellings. This land is the ONLY green buffer between these localities. Keeping its greenbelt status would prevent that urban sprawl.
- Rainhill will also be dramatically and negatively affected by the Halsnead Garden Village that has been given government approval in nearby Whiston. This huge development of 1500 homes will impact significantly on Rainhills roads that are already struggling at full capacity. EPGC should remain greenbelt to ensure that it does not add to this planned chaos.
- Air pollution levels within St Helens are already amongst the worst in the country. St Helens ill conceived plans to attract thousands more HGVs into the area will only make this situation worse. We need to conserve the green areas that are necessary to soak up the pollution and preserve the townsfolks health and wellbeing.
- There has been a declining population in St Helens since 1981. Whilst there may be some increase with the extra provision of warehousing positions, there would not be sufficient growth to justify St Helens Councils unrealistic figures for expansion.
- A council that quotes one of its mantras as 'Brownfield First', should be held accountable to that and develop all the brownfield first before ANY greenbelt development is considered.
- Office of National Statistics state that 383 houses should be built per year. St Helens Council arbitrarily decide to build 486 per year. Using the lower figure could lead to all development required being undertaken on brownfield sites.

- Safeguarded land is a term used to mislead people. The small print of the submission draft (page 47) enables safeguarded land to be built on after a minimum of 3 years. This is not in keeping with the integrity of a designated 15 year development plan. The council even had to reissue a letter to residents after they were accused of actively misleading the general public. All safeguarded land should be removed from the plan immediately.
- St Helens Labour Councillors voted through this plan in a whipped vote. I am led to believe that matters of development or building planning are not allowed to be whipped. This therefore renders this whole process unsound. Individual Labour councillors had issues with the plan and were not allowed to speak for fear of retribution and deselection from their posts. This is undemocratic. The video is available to watch on the council website.

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.

- **Remove all land to be reclassified as safeguarded from the plan, with immediate effect. These can be reviewed in future should such astronomical housing levels actually and unlikely be necessary.**
- **Compile a plan developing only brownfield sites. There are ample within the borough. If there is still then a proven need then revise the plan.**

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	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.**

I the undersigned, declare that I fully support this objection to development on St Helens greenbelt and the removal of greenbelt status from Eccleston Park Golf Club. I would like to be included as an additional objector, utilising all of the objection points described below.

NAME

ADDRESS

CONTACT

SIGNATURE

RO0229

Representor Details

Web Reference Number	WF0072
Type of Submission	Web submission
Full Name	Miss Jennifer Brown
Organisation	
Address	15 Barrowfield Road Eccleston St Helens WA10 5JU
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

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 Council appear to be using out of date statistics and information and therefore the outcome of the plan is less accurate.

The potential for using Brownfield sites has not been fully utilised. The use of Green Belt sites is clearly just the easier option as this is the most attractive option for developers.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

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

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

Response Date	3/13/2019 1:23:31 PM
---------------	----------------------

RO0230

295

Ref: LPSD
06 MAR 2019
(For official use only)



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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARGARET IRENE</u>	First name: _____
Last Name: <u>BROWN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>61 ROOKERY LANE</u> <u>RAINFORD ST. HELENS</u>	Address: _____
Postcode: <u>WA11 8BL</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____ Date: 4-3-2019

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

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

☒ Yes (via email) ☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>① I have great concerns over loss of green fields Grade 1 agricultural Land, loss of food grown. → loss of Employment, farming being main employment. ② all B Roads narrow & already very busy. Problems with Island already long queues going to St Helens will be increased. ③ New school will be needed as all junior schools will not be able to take more children, Rainford Tech college already full could not cope with more from Rainford Eccleston etc. ④ Doctors Surgeries already difficult to get appointments. also dentists. ⑤ No Fire service. Ambulances under pressure. Police are stretched, not enough. ⑥ No parking in Village more needed. Only 1 super market.</p>	

Please continue on a separate sheet if necessary

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

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

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

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

Please keep a copy for future reference.

RO0231



St. Helens
Council

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

Ref: LPSD

(For official use only)

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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.

1242

13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: MRS.

First Name: HAZEL

Last Name: BROWNBILL

Organisation/company: _____

Address: 12, SHERWOOD CRESCENT

BURNATION WOOD

WARRINGTON

Postcode: WAS4 1R

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 21-3-19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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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.**

RO0232

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 - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1204

13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: _____

First Name: JOHN

Last Name: BROWNBILL

Organisation/company: _____

Address: 12, SHERWOOD CRES.

BURTONWOOD

WARRINGTON

Postcode: WAS4 4PR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 21-3-19

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.

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

☒ Yes (via email)

☒ No

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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**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.**

RO0233

① - LPA05

PFO289

② - Statement of Common Ground

312



St. Helens
Council

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

Ref: LPSD

06 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

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: DAVID

Last Name: BRUCE

Organisation/company: _____

Address: 53 HAMILTON ROAD
GARSWOOD

Postcode: WN4 0SU

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 20/2/2019

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

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

☒ Yes (via email)

☐ No

Please note - 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
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or by email to:

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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.

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

Policy <i>LRA 05</i>	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

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

DELETE THE LAND FROM THE PROPOSED
REMOVAL FROM 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.

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



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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

D BRUCE 53 HAMILTON ROAD WN4 0SL

LPAOS QUESTION 6.

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.

The purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land using green belt land fails to encourage this. The release of greenbelt will cause significant harm.

Housing in this area isn't sustainable because of lack of school places, Doctors Surgeries, bus routes and other services. the use of cars is being encouraged because of lack of facilities.

There is no statement of common ground with neighbouring Authorities.

There are over 100 Brown field sites in St. Helens.

①

②

①

RO0234



① - LPAOS

② - Statement of Common Ground

PFO290

313

Ref: LPSD

06 MAR 2019

(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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: DOROTHY

Last Name: BRUCE

Organisation/company: _____

Address: 53 HAMILTON ROAD

CARSWOOD

NR. WIGAN

Postcode: WN4 0SH

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 20/2/2019

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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PART B - YOUR REPRESENTATION

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

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

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

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

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

Please tick as appropriate

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

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

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

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See attached sheet

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Delete the land from the proposed removal from 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.

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

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

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

Please keep a copy for future reference.

LPA05

Question 6

D BRUCE 53 HAMILTON ROAD, GARSWOOD WILT OS4

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.

The purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land, using green belt land fails to encourage this.

The releases of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of lack of school places, Doctors Surgeries, bus routes and other services, the use of cars is being encouraged because of lack of facilities.

There is no statement of common ground with neighbouring Authorities

①

②

RO0235

688

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

Ref: LPSD

13 MAR 2019

(For official use only)

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>COLIN</u>	First name: _____
Last Name: <u>BYRNE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>139, ORMSKIRK ROAD</u>	Address: _____
<u>RAINFORD, ST HELENS</u>	_____
<u>MERSEYSIDE</u>	_____
Postcode: <u>WA11 8JB</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: 	Mobile No: _____
Email: 	Email: _____

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

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

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☒ Yes (via email)

☐ No

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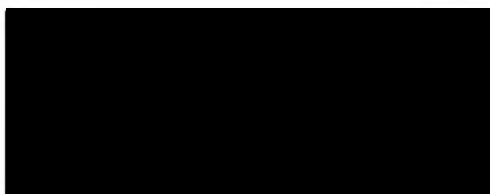
PART B SECTION 6 Colin Byrne *CB*

139, ORMSKIRK ROAD, RAINFORD ST HELENS WA11 8JB.

1) Next to the proposed site of ~~SHA~~ ^{Br} there is already a well established industrial estate and is associated with industrial activity and hazards from waste/pollution and even recently explosions reported in local press.

2) ~~SHA~~ ^{Br} ~~SHA~~ site/field promotes biodiversity and sustains wildlife. Building on this land will destroy these habitats and reduce Biodiversity. Mitigation has not properly been addressed in the revised local plan.

~~SHA~~ ^{Br} ~~SHA~~ HIGHER LANE / ROOKERY LANE



PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>I don't believe that this proposed Submission Draft passes the tests of soundness as set out in paragraph 35 of the National Planning Policy (dated February 2019).</p> <p>There are no exceptional circumstances to justify not using the standard method to calculate housing needs. And brownfield sites should be fully considered before removal of green belt (Grade 1 agricultural land).</p> <p>Traffic and congestion are already a serious issue to residents of Rainford, there has already been many serious road accidents including one fatality (Heavy Wagon). Air quality will also be a major issue from extra vehicles such as cars, public transport and other heavy equipment.</p> <p>(CONTINUED SEE SEPERATE SHEET)</p>	

Please continue on a separate sheet if necessary

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

Use brown field sites for development / housing.
 The use of BHA/SHA Rookery Lane / Higher Lane for property development needs to be reconsidered as this land is grade 1 agricultural land and has been farmed for the last 100 years by the same family. Loss of this land will lead to job losses with Bressit on the horizon the food from the land can be used for consumption. This land makes up the country's 2.7% of Grade 1 agricultural land.

(CONTINUED SEE SEPARATE SHEET) Please continue on a separate sheet if necessary

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

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


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

--

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

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PART B SECTION 7 COLIN BYRNE 
139, ORMSKIRK ROAD, RAINFORD ST HELENS WA11 8JB.

- 1). Other sites have been excluded during the site assessment phase due to being next to a similar industrial employment land.
- 2). Site ~~SHA~~ is close to two accident black spots in Rainford at either end of Mill Lane. Traffic from this site will inevitably pass through one or the other of these junctions on the way to or from St Helens. This leading to higher risks and a full ROSPA assessment will need to be conducted to avoid further accidents or fatalities. Air quality will be compromised also.

SHA / SHA HIGHER LANE / ROOKERY LANE





RO0236

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0454
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 2:19:13 PM
---------------	----------------------

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0455
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 1HB
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.

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?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 2:09:15 PM
---------------	----------------------

① - LPA05 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0456
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

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

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	2/22/2019 2:03:24 PM
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①-LPA05 ②-Statement of Common Ground

Representor Details

Web Reference Number	WF0457
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of Rat-running.

There are existing flooding problems at this site and remedies to prevent this would place even greater amounts of water into the Clipseley Brook.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

①

②

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

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

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

Response Date	2/22/2019 1:56:23 PM
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RO0237

① - LPA05 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0458
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of Rat-running.

There are existing flooding problems at this site and remedies to prevent this would place even greater amounts of water into the Clipseley Brook.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

①

②

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

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

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

Response Date	2/22/2019 1:51:47 PM
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① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0459
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 04 - 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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

\The Council has already granted planning permission in the \greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 11:40:27 AM
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① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0460
Type of Submission	Web submission
Full Name	Mr Micheal John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 - 1HB.
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.

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?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of lack of schools, doctors surgeries, bus routes and other services. the use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 11:27:08 AM
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① - LPA05 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0461
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	Resident
Address	58 Hamilton Road Garswood WN4 0SU
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:

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities.

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

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	2/22/2019 10:59:22 AM
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RO0238

01 APR 2019

57 ROOKERY LANE,
RAINFORD,
ST. HELENS,
MERSEYSIDE.

WALL 8BL

27TH MARCH 2019

Dear Sirs,

ST. HELENS MBC LOCAL PLAN 2018/19 - 8HA -
RAINFORD.

I will be greatly affected by this development as it will be directly opposite my house.

I have a number of objections to the plan which I wish to outline.

1). The plan proposes that up to 259 dwellings could be built on the land which would impact greatly on traffic using Rookery Lane and Higher Lane. Currently these roads are very busy due to drivers using them as a means of avoiding the roadworks at Windle. I can imagine that drivers will continue to use this route even when the roadworks are completed. The speed of the traffic using this route also makes the task of leaving my drive a very hazardous business.

2). The substantial increase in population will aggravate the already strained situation with regards to

school, facilities and health services in the village.

3). The development will be close to the existing Rainford Industrial Estate with the attendant problems of noise pollution, smoke and fumes which are regularly recorded there.

4). The site will cover a large area of Grade one agricultural land which can never be replaced once covered over. The land is used all year round to supply vegetables for a national supermarket chain. It must make sense to grow as much as possible within this country rather than relying on imported produce.

5). This second version of the Local Plan shows this area as the only Green Belt site in the village whereas in the first version there were several more sites. It strikes me that this is just a token gesture because the landowner wants to sell the site. It is an isolated site on the edge of the village rather than a site infilling more central parts of the village.

6). There are proposals to electrify the railway line through Rainford to link up with Liverpool, Skelmersdale and Wigan. If this development on Rookery Lane goes through then it will be at completely at the wrong end of the village to

benefit from this improvement in train services. If residents drive to the station this will add to the congestion in the village. It takes me about 40 minutes to walk to the station from home when I need to take a train. It is quite a distance.

7). The bus service from the village only really serves St. Helens and is quite unreliable with buses regularly failing to turn up. The proposed development would not be on the bus route which would necessitate a longish walk to the bus stop.

8). The substantial development would change the whole nature of the village from a rural environment into a dormitory location.

These are my objections to the scheme which I hope will be considered when a decision is being made into whether the development should go ahead.

Yours faithfully,

Christopher Bungay.

RO0239

Representor Details

Web Reference Number	WF0110
Type of Submission	Web submission
Full Name	Mr Allen Burdett
Organisation	
Address	11 Crantock Grove Windle St helens WA10 6EJ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA07
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:

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

The proposal to have Crantock Grove as an access route into the new housing development of 1,000 + houses is obviously unsound and flawed. The impact on traffic congestion for those in that area would be totally catastrophic.

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

A new junction would need to be provided from the A580 to the proposed new housing 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:

Response Date	3/13/2019 9:13:18 AM
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RO0240

①-LPA04 ②-LPA05

PF0300

325

Ref: LPSD

07 MAR 2019

(For official use only)

St Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: PATRICIA

Last Name: BURGESS

Organisation/company:

Address: 2 SLAG LANE

HAYDOCK

ST HELENS

Postcode: WA11 9RU

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: Date: 2/3/19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>I feel that warehousing between Liverpool Rd, Millfield Lane and Haydock Lane is totally unjustified, there already being empty warehousing on Haydock Industrial Estate. Furthermore it is using Greenbelt land once again</p> <p>The resulting increase in traffic is both dangerous and would cause further health issues within the local community.</p>	

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

No	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.

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

Policy	LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

I strongly believe that there is no need for more housing to be built, where are all the extra people coming from - no extra schools, doctors, bus routes. The proposed access is total madness (from the East Lancashire Road) let alone the proposal for a junction at Liverpool Rd & Vicarage Rd would be a complete disaster - the volume of traffic would be dangerous let alone the fact of the already overstretched highways, Further destruction of Greenbelt Land.

(2)

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

<p>NO</p>	<p>No, I do not wish to participate at the oral examination</p>		<p>Yes, I wish to participate at the oral examination</p>
-----------	---	--	---

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

<p></p>

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.

RO0241

326 PF 0301

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

Ref: LPSD

07 MAR 2019

(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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>FRANK</u>	First name:
Last Name: <u>BURCESS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SLAC LANE</u> <u>HAYDOCK</u> <u>ST HELENS</u>	Address:
Postcode: <u>WA11 9AU</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>2.3.19.</u>
-----------------------	----------------------

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA01 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>① UNNECESSARY DESTRUCTION OF MOLE GREENBELT LAND. INCREASED LEVELS OF NOISE - TRAFFIC AND AIR POLLUTION.</p>
--

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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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 part of the Local Plan does this representation relate?									
Policy	LPA05 Site 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</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 <u>set out</u> your comments.	
<p>HAYDOCK IS ALREADY SUFFERING FROM LACK OF SCHOOL PLACES / MEDICAL FACILITIES. ADDITIONALLY 500+ HOUSES EQUATES TO AN EXTRA 500+ CARS ON AN ALREADY OVERSTRESSED ROAD SYSTEM.</p>	

Please continue on a separate sheet if necessary

Please continue on a separate sheet if necessary

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

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

[illegible]

Please keep a copy for future reference.

RO0242



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

13 MAY 2019
1089

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: BARRY NORMAN	First name:
Last Name: BURGESS	Last Name:
Organisation/company:	Organisation/company:
Address: 557 CLOCKFACE RD CLOCKFACE ST. HELENS M15 8LE	Address:
Postcode: WA14 1LD	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: /	Mobile No:
Email: /	Email:

Signature: [REDACTED]	Date: [REDACTED]
-----------------------	------------------

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

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

Yes ☐ (Via Email)

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.

RO0243

EF0036



Local plan comments form

to:

planningpolicy

12/03/2019 12:06



1 Attachment



Council local plan comments.doc

Hi there

Attached is our completed comments form on the local plan. We have posted one but just in case it does not arrive want to send this too.

Mr and Mrs Nick Burke

Site 8HA

①-LPA05

②-MRA 1.7.2

③-S.A.



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr and Mrs	Title:
First Name: Philippa and Nick	First name:
Last Name: Burke	Last Name:
Organisation/company:	Organisation/company:
Address: 52 Heyes Avenue, Rainford, Sthelens Postcode: Wa11 8AR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12/03/19
-----------------------	----------------

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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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 at www.sthelens.gov.uk/localplan.

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

**Now please complete PART B of this form, setting out your representation/comment.
Please use a separate copy of Part B for each separate comment/representation.**

PART B – YOUR REPRESENTATION

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

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

Policy	LPA02 (site HA8)	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Green belt land should only be released in exceptional circumstances. That is official government and council policy and remains a central part of planning law in this country.

There are no exceptional circumstances in St Helens – a borough with a falling population and house prices below the national and regional average. Housing in St Helens is comparatively cheap and in low demand.

The green belt was created to prevent urban sprawl and over-development. It has served that purpose well. The proposals in the Local Plan would undo that good work. St Helens is a borough with few other physical assets and significant health problems such as childhood obesity, high rates of heart and lung disease. Destroying protected green belt land in such circumstances would be a step in the wrong direction given the long-term health trends in St Helens.

Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1. *814A*

This site (HA8) is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142

3

1

8HA
The site (HA8) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which is threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect. There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

St Helens Council wants 486 houses built every year in the borough. But the latest figures from the Office for National Statistics show St Helens only needs 383 houses a year. If these most recent figures from the ONS were used, the amount of building on protected land could be significantly reduced.

The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

These alternatives will have less impact on the environment and lead to less need for new infrastructure. The Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Please continue on a separate sheet if necessary

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

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

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**Thank you for taking the time to complete and return this response form.
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St. Helens
Council

③ - Para 172 DTC

(319)

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

Ref: LPSD

07 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr and Mrs	Title:
First Name: Philippa and Nick	First name:
Last Name: Burke	Last Name:
Organisation/company:	Organisation/company:
Address: 52 Heyes Avenue, Rainford, Sthelens Postcode: Wa11 8AR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

or by hand delivery to:

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

Policy	LPA02 (site HA8)	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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①

②

The site (HA8) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which is threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect. There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

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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.

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

Yes, I wish to participate at the oral examination

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

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.**

RO0244

Representor Details

Web Reference Number	WF0296
Type of Submission	Web submission
Full Name	Mr Keith Burke
Organisation	
Address	2 Cheyne Walk Sutton Heath St. Helens WA9 5SY
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	LPA05.1 - Application P/2018/0060/FUL - Development site 9HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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

Positively prepared, Justified, Consistent with national policy

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

There has been access to open space via a path linking Elton Head Road and Sherdley Road between the mobile phone mast on Elton Head Road (appx map ref SJ 50838 92711) and the western end of the St Helens Linkway bridge (appx map ref SJ50845 93326) for many years. The path runs through unmanaged wild grassland between Suttons Distribution Centre and the St. Helens Linkway, it is home to trees and bushes and is a haven for wildlife. It is not a public right of way but is well established and constantly used. It provides access to walking space which is open and away from traffic. The plan proposes this space and its path will be lost as it is part of the new housing development. The plan makes provision for pedestrian access through the new development. However, the path will not be continuous, it will not be through open space, and will not be traffic free. Apart from the local park there is very little access to open space in the area and any such space needs to be maintained in the interests of social, mental, and environmental well being.

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

The plan is eradicating much open space in the local area and risks creating a claustrophobic environment. There is already very little accessible open space in the local area. In the interests of the environmental and social well being of the local community what little open space there is must

be maintained. I propose that the boundary between the new housing development and St. Helens Linkway is widened thus maintaining at least some of the existing open space and the path through it. By making better provision to maintain accessible open space which is free from traffic the soundness of the plan will be improved. The risk of severe impact on local wildlife can be minimised and the social and mental well being of the local community will benefit.

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

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

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

Response Date	3/8/2019 5:55:32 PM
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RO0245

ELO267

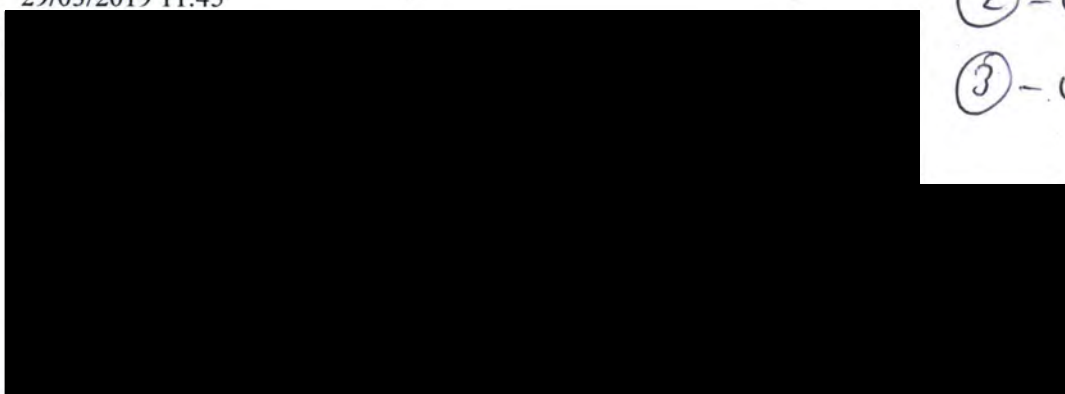


St Helens Local Plan - Submission Draft
Morgan, Anne
to:
planningpolicy@sthelens.gov.uk, [REDACTED]
29/03/2019 11:45

① - LPA04

② - LPA06

③ - LPA00



1 Attachment



Letter to [REDACTED] re St Helens Local Plan March 2019.pdf



Please find attached a letter from the Mayor of Greater Manchester in relation to the St. Helens Local Plan Submission Draft. If you would like to discuss any of the issues raised please do not hesitate to contact me.

Many thanks,

Anne

Anne Morgan
Head of Planning Strategy
Greater Manchester Combined Authority
Churchgate House, 56 Oxford Street, Manchester M1 6EU



www.greatermanchester-ca.gov.uk



This email is confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions present are solely those of the author and do not necessarily represent those of the Greater Manchester Combined Authority (GMCA). The contents of this email and any replies to this email may be required to be disclosed under The Freedom of Information Act. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error can you please delete it and notify the sender by telephone on 0161 736 5866. GMCA has made every effort to ensure attachments are free from viruses. However, neither the Authority nor the sender accepts any responsibility for viruses and it is your responsibility to scan any attachments. Mimecast

ANDY BURNHAM

**MAYOR OF
GREATER
MANCHESTER**

[REDACTED]
Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens
WA10 1HP

21st March 2019

Dear [REDACTED]

St Helens Borough Local Plan 2020-2035

I am writing to you to register my longstanding concerns about the level of logistics development being proposed around the M6, particularly J23 and the potential impact of this upon residential communities in Lowton, Golborne and Ashton-in-Makerfield.

I know that Wigan Council share these concerns and have submitted holding objections to the planning applications at Haydock Point and Parkside West, on the grounds of traffic impacts and air quality. I fully support Wigan Council in their comments requiring the policies for sites adjacent to the Wigan border to acknowledge this proximity and to protect the amenity of Wigan residents, particularly in terms of traffic and air quality.

The M6 is already at saturation point and it is hard to see how any further development can be sustained without major investment in capacity.

Policy LPA06 Land north east of Junction 23 M6 (South of Haydock Racecourse), Haydock

It is good to note that whilst this site was allocated for employment development in the previous version of your local plan, Policy LPA06 now proposes that it is safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period. The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review. This is better than the wholly unacceptable employment development proposed in the previous version of the plan, given the pressure it would add to Ashton-in-Makerfield which is routinely at a standstill during the rush hour. Unless there is now direct access to the M6 – avoiding any pressure on local roads or J23 – then I will continue to oppose this development.

Policy LPA10: Parkside East

I have previously supported the proposal to develop a Strategic Freight Rail Interchange (SFRI) facility at Parkside. I am concerned however about the potential to develop this site for B2/B8 uses which are not linked to the SFRI as road served freight in this location is likely to load traffic onto the East Lancashire Road at Lane Head which has the potential for impacts of air quality, noise and visual amenity on local residents in Wigan Borough. As an absolute minimum, this proposal must include a condition that it adds no more traffic to local roads in Lowton/Lane Head and that access to it be only from the M6.

I trust that you will consider my comments.

Yours sincerely



ANDY BURNHAM
MAYOR OF GREATER MANCHESTER



3

RO0246

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

Ref: LPSD
30 APR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>CHRISTINE</u>	First name:
Last Name: <u>BURNS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>1 DOUGLAS AVE</u>	Address:
<u>BOLD</u>
<u>ST. HELENS</u>
Postcode: <u>WA9 4SZ</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>28/2/19</u>
-----------------------	----------------------

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

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO0247

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

Ref: LPSD

30 APR 2019

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>BURNS</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>2 DOUGLAS AVE</u> <u>BOLD ST HELENS</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>28/2/19</u>
------------------	----------------------

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

☒ Yes (via email)

☐ No

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

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

or by hand delivery to:

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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.**

RO0248



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

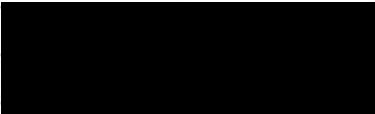
Part B – Your Representation(s).

1418

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: <u>MRS</u>	Title:
First Name:	First name:
Last Name: <u>VICKY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>TUNSTALLS FARM</u>	Address:
Postcode: <u>WA9 4QT</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>10-5-19</u>
--	----------------------

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

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

Yes ☐ (Via Email)

No ☐

Please note - 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.

RO0249

ELO203

RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft

to:
 planningpolicy
 13/03/2019 15:11

① - LPA07

② - LPA04

③ - General

1 Attachment



Local Plan PO Stage Comments March 2019.pdf

Dear Planning Policy

Please find my comments on the draft plan attached. Thank you.

Kind regards

Andrew Burrows MSc MCIHT MRTPI

11 Calday Grove, Pewfall, St Helens, WA11 9RS

Dear Sir or Madam,

**St.Helens Borough Local Plan 2020-2035: Submission Draft
 Town and Country Planning (Local Planning) (England) Regulations 2012**

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St.Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or

- by email to planningpolicy@sthelens.gov.uk; or
- by using our on-line form at www.sthelens.gov.uk/localplan.

All representations must be received by 5.00 pm on Wednesday 13th March 2019. Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at www.sthelens.gov.uk/localplan, and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

Data protection

We process your 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.

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email planningpolicy@sthelens.gov.uk.

How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,

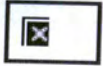
Jonathan Clarke

Development Plans Manager

(See attached file: Statement of Representation Procedure.pdf)

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delete the message and all copies from your computer. "



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Dear Sir / Madam

Comments on 2020-2035 Submission Draft Local Plan

I object to allocations EA6, EA7 & HA3. My general and site-specific comments on the draft plan are provided below.

1. Inadequate Support for St Helens Central / St Helens Junction Rail Link

St Helens town centre has for many years needed a direct rail connection to Manchester. This plan will fail to deliver it yet again. The draft plan offers no clear strategy as to how this vital rail link will be delivered, how the plan will help fund it, or how the rail link will integrate with wider land use planning objectives.

①
FAILURE TO
DELIVER
RAIL CONNECTION
TO MANCHESTER

2. Inadequate Support for Carr Mill Rail Station

The draft plan offers only vague warm words regarding the proposed rail station development at Carr Mill. It contains no clear strategy detailing how the development of Carr Mill Station integrates with nearby land uses and proposed developments, or how the plan will help fund construction of the station or safeguard appropriate car parking levels to assist the station's business case. The plan will fail to deliver this new rail station yet again (as the previous local plan did).

①
FAILURE TO
DELIVER
STATION @
CARR MILL

3. Scale of Modern Warehousing Developments Out of Context Alongside Existing Residential Areas

It should be obvious from recent developments at EA2 Florida Farm that the scale of modern warehousing developments is far too large to be positioned beside existing residential areas. The plan does nothing to address this issue, particularly in relation to EA6 & EA7 developments proposed alongside the A58 Liverpool Road.

②
LANDSCAPING?
EA6, EA7

4. Extent of Land Release & Securing Infrastructure Improvements

The plan does not sufficiently prioritise brownfield land for development and is too heavily reliant on taking 'easy wins first' by promoting excessive levels of greenfield / green belt development. The plan also contains no clear transparent mechanism for securing contributions to local infrastructure improvements – despite the lower land development costs associated with greenfield land release. The potential financial benefits of adopting the Community Infrastructure Levy have not been clearly or independently assessed.

③
CGL

5. Partiality of the Council

The Council stands to make significant financial budgetary gains (in the form of increased council tax and business rates revenues) from the draft local plan. Yet the plan fails to acknowledge the scale of this financial gain and subsequently underplays the detrimental impacts of all proposed developments (excessive traffic levels, air pollution, CO2 emissions & impact on climate change).

④ - GEN
FINANCIAL
GAINS?

6. No Clear Strategy for Public Transport

Virtually all bus services have been withdrawn from the A58 Liverpool Road, and yet the draft plan proposes large scale land releases in this area (HA3, EA6 & EA7). The draft plan will permit development proposals without securing significant improvements to public transport, thus encouraging over-reliance on the private car. The plan contains no clear strategy for improving public transport, or for developing the A580 as a key public transport corridor (as planned within the Greater Manchester Spatial Framework), despite promoting extensive site releases alongside the A580.

①

Referencing
LPPD SITE DEVELOPMENTS

HA
EA6
EA7

7. Detrimental Impact on Climate Change Not Being Properly Assessed or Mitigated.

The plan does not present a clear strategy for how future developments will contribute towards minimising climate change. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on CO2 emissions.

8. Detrimental Impact on Air Pollution Not Being Adequately Assessed or Mitigated

The plan does not present a clear strategy for how the air pollution created by future developments will be managed and mitigated. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on air pollution levels, and the negative health impacts this will bring.

9. Exclusion of the Public from Decision Making on Local Transport Infrastructure

As with development at EA2 Florida Farm, the draft plan will allow the Council to approve developments whilst highway capacity issues (and any required improvements) are 'kicked down the road' for St Helens Highways Department to try and alleviate in future. Infrastructure works will then be undertaken without any consultation with the public (as with A58 Blackbrook Diversion and A580 / Haydock Lane improvement works). The draft plan should contain a clear policy to ensure the impacts of future highway improvement works are always fully assessed before planning applications are approved, and a clear mechanism to ensure consultation with the public always occurs in respect of the design of publicly funded highway improvement works.

10. A58 / A580 Junction Improvement

It is noted that details on this future junction improvement have been left empty within the Infrastructure Delivery Schedule. This suggests issues with highway infrastructure design are being deliberately 'kicked down the road', to be subsequently addressed by the Council's Highways Department. However, when the Highways Department undertakes the works, it will then avoid undertaking any consultation with residents in respect of the scheme design.

The following highway measures are needed in the vicinity of the improved A58 / A580 junction – to adequately mitigate the negative impacts of increased car and HGV traffic levels on the A58 Liverpool Road and A580 East Lancashire Road:

- Reduction in speed limit from 40mph to 30mph on A58 Liverpool Road (A580 to Millfield Lane) to improve highway safety;
- Keep Clear Markings on A58 Liverpool Road opposite Calday Grove, to address existing highway safety problem exiting Calday Grove;
- Reinstatement of pedestrian footway route across A580 (West side of junction) from A58 Liverpool Road (previously removed by the Council as part of A58 Blackbrook Diversion works - without public consultation - in 2008);
- Installation of controlled pedestrian crossing facilities on all arms of the A580 / A58 junction; and
- HGV ban on A58 Liverpool Road (between A580 and Millfield Lane) to improve highway safety and mitigate the significant increase in HGV numbers expected to use the A58 (which is too substandard in highway design terms for it to now be promoted as a main HGV route).

Yours faithfully,

Andrew Burrows MSc MCIHT MRTPI

11 Calday Grove, Pewfall, St Helens, WA11 9RS

RO0250



St Helens
Council

3

13 MAR 2019

Ref: LPSD

(For official use only)

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

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①-LP006

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: CAROL	First name:
Last Name: BURROWS	Last Name:
Organisation/company:	Organisation/company:
Address: 67 RUSKIN DRIVE ST. HELENS	Address:
Postcode: WA10 6RW	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 12/03/19

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.

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

^{explicitly}
The undersigned all support and agree with the representation above and wish their voices to be heard by the Planning Inspector:

Name

Address

Postcode

Carol Burrows

Mark Burrows

Eunice Bromilow

Joe Burrows

Jennifer Boyd

Yvonne Boyd

KATHRYN EDMOND

MIKE EDMOND

John Burrows

Peter Burrows

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	8HS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Local Plan (2018)							
Other documents (please name document and relevant part/section)				Green Belt Review (2018)			

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

Please tick as appropriate

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

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

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

The growth in the Borough does not justify the extra house building proposed in the St. Helens Local Plan Submission Draft (SHLPSD)2018. There are no special circumstances that warrant Green Belt release.

8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Eccleston and Windle with employment areas.

The Local Plan Submission Draft is based on flawed employment forecasts and cannot be supported by historical facts.

8HS should be removed from the safeguarding for development category and maintained as Green Belt for the reasons 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.

Change 8HS from Safeguarded and maintain it's Green Belt status

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:

[illegible]

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

RO0251



St. Helens
Council

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

Ref: LPSD

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PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>Matthew</i>	First name:
Last Name: <i>Burns</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>10 Paradise Crescent Clock Face</i>	Address:
Postcode: <i>W19 4FZ</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>11 Mar 19</i>
-----------------------	------------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO0252



St Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Michelle	First name:
Last Name: Burrows	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 10 Frenchfields Crescent Clockface, St Helens,	Address:
Postcode: WA9 4FZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 12 May 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 ☐

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RO0253

660089



St Helens Borough Local Plan 2020-2035 (Submission Draft) LPA02 - Site 8HA

Ian Burslem

to:

'planningpolicy@sthelens.gov.uk'

12/03/2019 12:29

 Site 8HA
 ① - LPA02
 ② - SA

Dear Sir,

I am writing to formally register my objections to the building of 259 new houses on Site 8HA

The 2 main reasons are simply that it is not necessary to build on this green belt land when there are other sites more suitable or brownfield sites that can be used and secondly Rainford does not have the facilities to cope with another 259 houses adding approximately another 500 cars.

The reasons for requiring extra housing in Rainford / St Helens has been shown to be based on figures that are too high and actually that amount of housing is not needed.

The figures are flawed and therefore why is Green Belt land being used and taken away ?

There are no exceptional circumstances to do this.

Surely other reasonable alternatives should be fully explored, including brownfield sites and other more suitable sites.

Site HA8 (Rookery Lane) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector.

This is obviously threatened by the proposed removal of this site from the Green Belt which goes against the councils strategy to promote employment and economic growth.

Initially 6 sites around Rainford were proposed and only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 have all been discarded so surely HA8 is one of the least appropriate Green Belt sites allocated for housing in Phase 1.

The site is also next to industrial employment land and other sites have been excluded because of similar situations to this.

In addition figures show that 936 houses in the borough were classed as being long-term empty in the most recently recorded figures in October 2017.

Council tax figures from October stated there were a total of 2,853 unused homes in the borough.

Surely a priority should be to lower these figures and build less on current Green Belt land.

The building planned at the old St Helens Car Auctions site by Carr Mill Dam is a great example of using existing land to build on and improve the area instead of building on existing farming Green Belt land which is just not necessary.

This site should be removed just for all the above reasons.

In addition however, the facilities in Rainford cannot cope with this additional housing, this includes the lack of doctors and dentists and also the increased traffic it brings to the small centre which has extremely minimal parking anyway and also the increased traffic to Rookery Lane and also Thickwood Moss Lane which will now become a dangerous, major cut through to the Rainford ByPass.

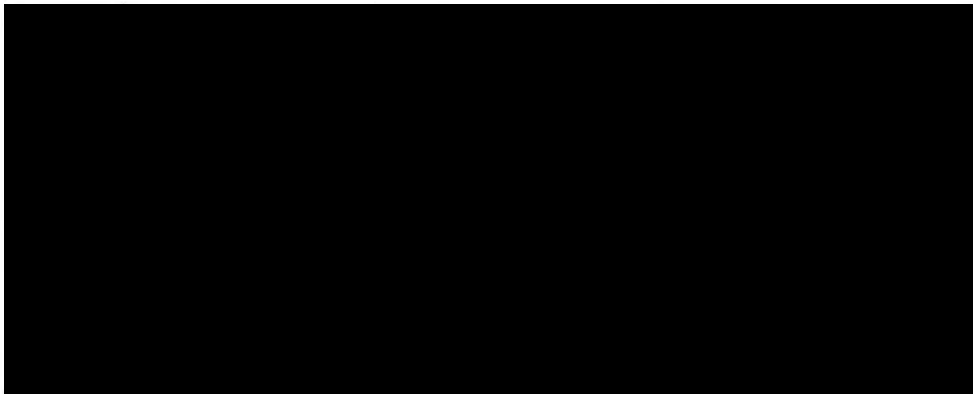
There are also much better places to add additional housing around St Helens, closer to the centre, with better access to public transport and the road network as opposed to building in Rainford itself.

In summary there is no need to build on farming Green Belt when there are much better alternatives to

provide additional housing in the area.

Best Regards
Ian Burslem

1 Rookery Drive
Rainford
Merseyside
WA11 8BB



RO0254



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: LINDA	First name:
Last Name: BYRNE	Last Name:
Organisation/company:	Organisation/company:
Address: 11 SALEY DRIVE BOOTLE	Address:
Postcode: L20 6FG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

27/03/19

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.

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.

RO0255



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

13 MAY 2019

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR MATT</i>	Title:
First Name: <i>MATTHEW</i>	First name:
Last Name: <i>BYRNE</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>6 JASMINE GARDENS BOLD ST HELENS</i>	Address:
Postcode: <i>WA9 4ZL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>17/04/19</i>
--	-----------------------

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.

RO0256



St. Helens
Council

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

Ref: LPSP

(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

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: <i>MR</i>	Title:
First Name: <i>JASON</i>	First name:
Last Name: <i>BYRNE</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>6 JASMINE GARDENS BOLD ST HELENS</i>	Address:
Postcode: <i>W49 4ZL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>17/04/19</i>
--	-----------------------

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.

RO0257



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

13 MAY 2019

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>KAREN</i>	First name:
Last Name: <i>BYRNE</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>6 JASMINE GARDENS BOLD ST HELENS</i>	Address:
Postcode: <i>WA9 42L</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>17/04/19</i>
--	-----------------------

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.

RO0258

Representor Details

Web Reference Number	WF0436
Type of Submission	Web submission
Full Name	Ms Sarah Byrne
Organisation	N/A
Address	9 Amanda Road, Rainhill L35 8PN
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	LPA01, LPA02, LPA05, LPA06, LDP01
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I am unable to comment if the Local Plan is legally compliant as I am not legally trained. I would have selected 'Don't Know' if that was available. However, I do believe that the plan is contradictory throughout - please see below.

LPA01 and LPA02: —

Points 2 and 4 of this Policy refer to the development providing necessary infrastructure and services, and that the development will be sustainable or made to be sustainable. Infrastructure and services such as doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed — I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. Additionally, the ageing population of Rainhill does not correlate with the proposed need for more housing to be built; care homes and local authority are services are already at maximum capacity, hence the rise in council tax to accommodate this.

Point 8 of this Policy refers to the quality of life, health and well-being for residents. I disagree with this point. As stated above, doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed — I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. I believe the development will add to an already strained NHS, and in the long term will impact the physical and mental health of residents, in addition to the staff having to provide these services.

Further, I believe that additional traffic that will result from the potential development is a danger to residents (particularly children and the elderly, the latter being a large part of the Rainhill demographic). 'A' and 'B' roads such as Warrington Road, Rainhill Road and Portico Lane are already frequently jammed, especially Monday to Friday 15:00-18:30. As a result, this adversely affects minor 'B' and 'C' roads such as View Road, Two Butt Lane and Longton Lane. Warrington Road in particular also already services the Liverpool City Regional Plan. Warrington Road, Rainhill Road, and Portico Lane have been confirmed by the council as being already at maximum capacity for traffic. Building more houses will only add to this problem.

Most households have an average of two cars; I believe that further developments will double the already heavy traffic within Rainhill, in addition to impacting the quality of the environment – how will this reduce the impact on climate change, carbon emissions and promote healthy communities as also set out in LPA01? How is the proposal for more development in line with wider government climate change and healthy lifestyle priorities?

③ — LPA05 and LPA06: — ④

Number of houses proposed is too great in these sections – I do not believe that the level of development is sustainable, and would have detrimental effects on the environment, quality of life, traffic and pollution levels, and public services. St Helens area, particularly Thatto Heath, is the second highest effected by respiratory disease, St Helens having an average of 51.9 deaths per 100,000 in under age 75 in comparison for the North West (which stands at 44.3). How will an increase in traffic and destroying greenbelt land reduce this figure? I believe developments may encourage existing residents to move from the area. I am currently entertaining this idea; one of the main reasons I moved to Rainhill was because of its natural space and smaller community. I did not move from an urban area to live in another urban area.

How is urban sprawl being controlled if the parcel of 3HS is released for development? The whole idea of having a greenbelt is to ensure neighbouring boroughs do not merge, to safeguard protected flora and fauna species (of which St Helens boasts 13 protected species), and control flooding/water flow which will be adversely affected if this land is built on. 3HS is a confirmed zone two and three flood zone with a high water table. How will this land be able to control and drain flooding if it is built on? Will the council be responsible for damage to properties as a result of this potential flooding if they fail to consider this confirmation? Will the council accept responsibility for the reduction or demise of the at least 13 protected flora and fauna species on this land? Greenbelt land is greenbelt for good reason and is meant to be sustained for a variety of reasons, not sold when the price is right.

Objections submitted at stage one of the local plan by Sport England in relation Eccleston Park Golf Club losing status as a recreational space and golf club remains unanswered by St Helen's Council. Any objection from a statutory consultee must be resolved – why is this still outstanding and when will it be addressed?

Additionally, although competition between developers has been suggested, I do not believe that the developments will be affordable. I believe that these houses will be retailed at maximum prices, thus resulting in slow if no uptake. Slow uptake of the recent developments at Badgers Close in Rainhill strongly suggest this. Growth of employment opportunities does not necessarily mean growth of income. Proposed employment industrial/storage/warehousing sites often employ those on minimum wages or just over.

Additionally, table 4.6 in LPA06 shows the need for 7245 houses; 1437 additional houses using 57 hectares of land is required, not 288 as claimed in table 4.5.

LDP01: — ⑤

I believe the level of proposed development is a direct contradiction to points 1 (ii, iii, iv, v and viii) and 2 (iii).

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

In line with the National Planning Policy Framework for 2019, this land should not be listed as land for proposed removal from the greenbelt, and should therefore be deleted from this list. Further, this land should not be removed from the greenbelt for development, and also should not be re-listed/re-categorised as 'safeguarded'.

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 3:16:23 PM
---------------	----------------------

RO0259

1422
12 MAR 2019

46 Central Avenue
Eccleston Park
Prescot
Merseyside
L34 2QP

10th March 2019

Dear Sirs

**St Helens Borough Local Plan : Submission Draft Town and Country
Planning (Local Planning) (England) Regulations 2012**

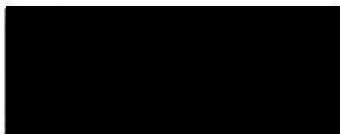
Thank you for your letters of 15, 16 and 25 January 2019. I have written previously regarding the Local Plan and enclose a copy of my letter dated 11 January 2017 from which you will see that I had concerns about and was opposed to the removal of Eccleston Park Golf Club from its green belt status.

I am saddened to learn that the green belt status has been removed and the site has been safeguarded for housing development. As far as I can see, the reasons set out in my letter of 11 January 2017 are still strong arguments for protecting the green belt status, in addition to the following points. x Sire 3HS J

1. Although the St. Helens Council's letter dated 25 January 2019 states that, under draft policy LPA06, housing and employment development of safeguarded sites before 2035 will be refused, there is no guarantee that this date could not be brought forward. I understand that Mulberry Warrington Ltd paid six million pounds for the site and it is difficult to believe that a developer would invest such a sum of money if it did not think that it would be able to start development in the very near future.
2. In addition to the risks already pointed out regarding building in close proximity to power cables and pylons, the North West, and St Helens in particular, have been singled out as one of the worst areas in the country for respiratory diseases.
3. As someone who walks nearly every day of the week along Portico Lane (B5413) from the junction with Central Avenue to the convenience store at the roundabout where Portico Lane meets Delph Lane and Old Lane, I can confirm that this stretch of road already carries a large volume of traffic and there is often congestion, particularly at peak travel times. Assuming a development of 968 houses and an average of two cars per household, some 2,000 cars will be added to an area already experiencing congestion, particularly if there is to be secondary access to and from Portico Lane as has been suggested. There would also be a serious risk of accidents for the reasons stated in my letter of 11 January 2017.

4. A development of 968 houses with an average of "say" 4 persons per household would increase the local community by almost 4,000 people. As well as issues concerning pollution and congestion, there appears to be a lack of essential services, such as medical centres, dentists and schools to support such an increase. Ironically, a school on an adjoining site in Delph Lane was closed some years ago for housing development.
5. St Helens is a town with a falling population. The coal mining and glass making industries, which were a major factor in the expansion of the town during the Industrial Revolution, no longer exist (apart from Pilkingtons, although it no longer employs the huge workforce it once did). House prices are lower than the national average and in low demand.
6. When the Local Plan was produced in late 2016, there were brief references to a lack of brownfield sites being available for development but there was no detailed information regarding their locations and why they had been dismissed. An article in The Times newspaper of 12 February 2018 dealing with the sacrifice of green belt land for development included St. Helens as an example of town with a brownfield capacity of 5,818 houses but with a proposal to create 4,093 houses in the green belt. It appears that the Council's register now supports this figure of 5,818, which raises the question as to why a more progressive Council should not be focusing its efforts into addressing the redevelopment of these sites into more attractive locations.
7. The site of Eccleston Park Golf Club has a long history for use as farmland. For over 200 years, it served as the farm for Rainhill Hospital. During the 1st and 2nd World Wars, the hospital was used for the rehabilitation of members of the armed forces and the grounds no doubt helped with their rehabilitation and mental well being. With the formation of the golf club in 1999 it continued to provide outdoor recreational facilities and support a diversity of wildlife until its closure by Mulberry Homes in 2018, which also resulted in the loss of over 30 jobs in an area where unemployment is high.
8. It is a fundamental part of planning law in this country that local Councils and the Government should only release Green Belt Land in exceptional circumstances. I cannot see that the plan put forward by St. Helens Council has demonstrated this. Quite the opposite in fact - it is "working against" its own plan by removing green belt status. I sincerely hope it is rejected by the Government Planning Inspector.

Yours faithfully,

A black rectangular box redacting the signature of A R Byron.

A R Byron

46 Central Avenue
Eccleston Park
Prescot
Merseyside
L34 2QP

11th January 2017

Dear Sirs

Local Plan 2018-2033 - Preferred Options Consultation

I am writing to comment generally on the above plan and specifically regarding Site HA8, because my property is close to Eccleston Park Golf Club.

Site HA8 - Eccleston Park Golf Club

1. The site is almost entirely surrounded by housing and other development. Whilst there may be a temptation to "fill it in" with more housing, a more imaginative approach would be to leave it alone rather than destroy the only "breathing space" within a built up area.
2. A railway line forms a boundary with part of the site and it is dissected by a power cable and four large pylons. As such, it would be necessary to create large corridors of land between these structures and housing. All of these features create environmental concerns in close proximity to housing, particularly health risks from power cables.
3. Page 57 of the Plan states that primary access to the site would be from the B5413 with secondary access at Portico Lane. This suggests that a stretch of Portico Lane running approximately South from Eccleston Park Station would be used. If so, it comprises a short distance of approximately 200 metres with visibility restricted at one end by the railway bridge near Eccleston Park Station and a sharp bend at the other end near a children's nursery. The road is not designed to carry the volume of traffic it already does so that the extra traffic associated with a development of 968 homes would increase traffic flow, pollution and the risk of accidents. Creating a bus route through the development would appear to add to a potential problem and there seems to be a risk that the development of the site would worsen the impacts on existing roadworks rather than minimise them as the Plan suggests.
4. The Plan also refers to an open watercourse and the need to reduce the risk of flooding. Rainfall patterns and water table levels are increasing generally, and over development of land is a factor which contributes to flooding. In the St. Helens area, another factor is the decline in the glass manufacturing industry, which used to draw off large volumes of water. The removal of areas of open land to replace it with hard standing developments is reducing natural areas where water can

naturally disperse and it is hard to imagine how a development of 968 homes can enhance biodiversity as stated in the Plan.

Brownfield sites

Throughout the Plan, there are brief references to a lack of brownfield sites being available for development, (including references to 2016 Strategic Housing Land Availability Assessments) but there is no detailed information regarding their locations and why they have been dismissed. In the same way that specific arguments have been put forward to try to justify why green belt land should be released, similar detailed information regarding the unsuitability of specific brownfield sites would have created a more "balanced" Plan.

For instance, recent press reports suggest the redevelopment of retail parks into low level blocks of flats around courtyards and gardens. Not only would it remove ugly sites and structures, which are becoming increasingly threatened by the rise in online shopping but it could also help to answer the unaffordability problem by using areas where infrastructure already exists.

Also of concern is the government's new homes bonus (introduced to incentivise councils to allocate more land for housing) and suggestions that this is encouraging the release of green belt land.

Hopefully, the government's new white paper due to be released this month will re-enforce its commitment to protect green belt land and reform the new homes bonus to encourage the re-use of urban brownfield land.

Green Infrastructure


Policy LPA09 refers to Green Infrastructure and Policies LPC05 to LPC12 deal with connected issues such as the protection of open spaces in close proximity to housing.

Throughout the Plan, much emphasis is placed on retaining, maintaining and creating areas which achieve these objectives.

It seems that Site HA8 already achieves the objectives set out in the above policies. It is a single oasis of open space surrounded by housing, is already landscaped as part of its function as a golf course providing outdoor sporting and recreational facilities and is a suitable environment to support a diversity of wildlife.

As such, the Council would be "working against" its own Plan by removing its green belt status.

Yours faithfully,

A black rectangular box redacting the signature of A R Byron.

A R Byron

RO0260



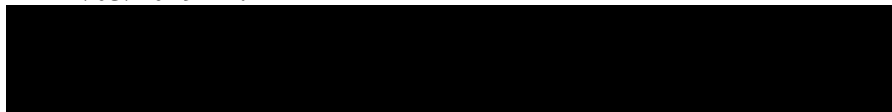
Consultation on St Helens Borough Local Plan

Dave Cable

to:

planningpolicy

12/03/2019 12:24



Dear Sir/Madam

I wish to object to the St Helens local plan on the grounds outlined in the letter dated 1st March 2019 from my constituency MP, [REDACTED], to the Chief Executive of St Helens Council. I fully support my MP's comments and continue to be dismayed at St Helens Council's apparent determination to remove Green Belt protection from the sites identified. This is a dire loss of amenity.

I am particularly concerned about site 2ES (Haydock Point). Following the public consultation in 2017 I wrote to the developers, Wigan Borough Council and [REDACTED] to outline my objections. I also submitted them to St Helens Council via your online consultation on the local plan. I re-iterate my objections here:

1. Levels of vehicular traffic in the area at peak times are already extremely high. Congestion is regular and severe. This has a significant effect on journey times, leading to personal frustration, high levels of damaging emissions, and elevated costs to the local economy. I use the A49 Warrington Road to get to the M6 southbound every working day. It frequently takes more than 10 minutes to travel the 1 mile from the Kings Arms on Gerard Street in Ashton to J23 Haydock Island. One day this week it took me 40 minutes. Whilst I appreciate that the main entrance to Haydock Point is likely to be on the A580 East Lancs Road, rather than the A49, it seems likely that traffic signals, lane markings and other routing mechanisms will be adjusted to favour traffic to/from Haydock Point. Otherwise how can you truthfully claim that the development is ideally situated for the M6? Furthermore, the already high levels of traffic using the M6 are only going to increase. So my journey to work is only going to take longer and become more frustrating. And that goes for many people living in Ashton-in-Makerfield.
2. The site is currently greenbelt land. I understand that St Helens Council are considering a plan to rezone it as development land. This is unacceptable. Greenbelt land should be protected and enjoyed by all. Rezoning it and developing it represents a significant loss of amenity. And when I'm stuck in traffic on the A49, I would like to be able to see open countryside instead of staring at yet another warehouse.
3. Whilst the land comes under the jurisdiction of St Helens Council, the bulk of the negative impact will be felt by residents of Wigan Borough Council in Ashton, Golborne, Lowton and Leigh. I have written to Wigan Borough Council's planning team about this and asked them to make representations to St Helens Council.
4. Where is the demand for this additional logistics capability? There are many similar sites in the area already, and I believe that some lots are empty, such as the former Asda distribution warehouse at Marus Bridge.
5. Creation of new jobs is a good thing, but how many of them will be filled by local residents, and how many by people from elsewhere, leading to yet another increase in traffic levels.

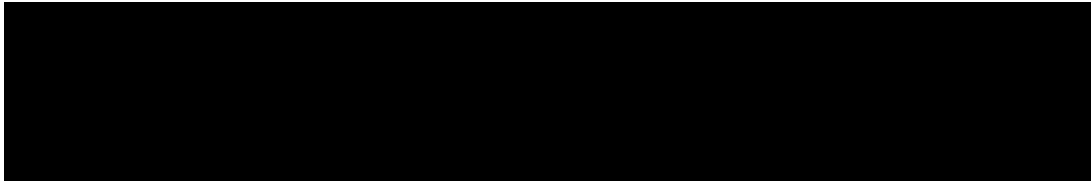
From my perspective as a resident of Ashton-in-Makerfield, there is little or no benefit to the local community as a result of this plan, but there is significant negative impact. I hope that planning

permission is withheld.

Finally, I note that yet another very large warehouse is in the final stages of construction on the north side of Penny Lane, adjacent to the M6, at the junction with Long Lane (the A49). The junction and road alignment is being remodelled, presumably to allow for increased lorry traffic. If the Haydock Point development goes ahead as well then Ashton is going to come to a complete halt.

I hope you take my objections, the objections of my MP, and objections from other local residents fully into consideration.

Best regards



RO0261

Representor Details

Web Reference Number	WF0262
Type of Submission	Web submission
Full Name	Mr Arthur Caddick
Organisation	
Address	18 Amanda Road Rainhill L35 8PP
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

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.

When Rainhill hospital closed approval was given to build on the footprint of the old hospital buildings only, why are you now proposing to build on the old hospital farm land. The plan is to build 900+ houses, the local schools are full, there are only 2 doctors surgeries in the village (1 of which is not accepting any new patients). What are the proposals for education and healthcare?

900+ houses will generate at least 1500 vehicles trying to exit the estate, it will be extremely dangerous to exit onto a very narrow Rainhill Road or even more dangerous to exit onto an even narrower Portico Lane which has a hazardous blind spot at the railway bridge at Eccleston Park Station.

By building on this green belt land the consequence will be that St Helens will join up with Rainhill to create a sprawling mass of houses with no green space.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

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

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

Response Date	3/10/2019 2:20:35 PM
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RO0262

Representor Details

Web Reference Number	WF0030
Type of Submission	Web submission
Full Name	Mrs Carol Cain
Organisation	
Address	
Agent Details	

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

No

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

Policy	LPA04
Paragraph / diagram / table	Warehousing Liverpool Road/Millfield Lane sites 2EA, 5EA and 6EA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

No more Warehouses needed in Haydock, too many HG and LG traffic movements affecting congestion and air quality affecting health

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

Go elsewhere, Brownfield sites, existing industrial facility can be re-utilised.

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

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

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

Response Date	3/13/2019 4:49:56 PM
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Representor Details

Web Reference Number	WF0044
Type of Submission	Web submission
Full Name	Mrs Carol Cain
Organisation	
Address	
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	Housing Florida Farm South site 2HA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

There cannot be any more housing in Haydock (FFS) on such a scale. There is a limited and failing infrastructure which cannot support more people, traffic, congestion and air quality.

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

Delete this land from the proposed removal from the Green Belt

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

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

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

To ensure that my issues are heard.

Response Date	3/13/2019 4:03:14 PM
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RO0263

Representor Details

Web Reference Number	WF0032
Type of Submission	Web submission
Full Name	Mr David Cain
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	LPA04
Paragraph / diagram / table	Warehousing Liverpool Road/Millfield Lane sites 2EA, 5EA and 6EA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Haydock does not need any additional stress on infrastructure caused by industrial development. There is little enough room for more HG or LG traffic, congestion and air quality are severely affected by existing facility. The J23, M6 is not fit for purpose and needs to be re-addressed, Highways England are aware of issues pertaining.

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

Logistically, Haydock is a spent force. Consider other options, utilise existing industrial facility including Brownfield sites elsewhere. The use of Greenbelt is against the National policy.

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

Yes, I wish to participate at the oral examination

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

To be present to hear all comments.

Response Date	3/13/2019 4:44:26 PM
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Representor Details

Web Reference Number	WF0075
Type of Submission	Web submission
Full Name	Mr David Cain
Organisation	
Address	
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	Housing Florida Farm South site 2HA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

There cannot be any more housing in Haydock (FFS) on such a scale. There is a limited and failing infrastructure which cannot support more people, traffic, congestion and air quality.

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

Delete this land from the proposed removal from the Green Belt

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

Yes, I wish to participate at the oral examination

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

To ensure that my issues are heard.

Response Date	3/13/2019 1:02:46 PM
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RO0264



St Helens Borough Local Plan 2020-2035 (Submission Draft)
Jeremy Calderbank to: planningpolicy

12/03/2019 21:51

Dear sir/ madam

I am sending this email as a resident of Rainford [REDACTED] In connection with the proposed release of Greenbelt land namely (HA8 Rookery Lane). I would like to make my thoughts known to you as to why I would judge the proposals as being totally inappropriate for Rainford and for the borough. I would ask you to consider my points below.

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I trust that the correct and logical decision can be made and the above land to be spared any form of development and be preserved as greenbelt, allowing the valuable attributes of the land to be utilised by continuing to farm and produce crops in a sustainable manner, preserving jobs and contributing to the local economy,

Kindest regards

Jeremy Calderbank
 91 Rookery Drive
 Rainford
 St Helens
 WA118BA

RO0265

Representor Details

Web Reference Number	WF0049
Type of Submission	Web submission
Full Name	Mrs Nicola Calderbank
Organisation	
Address	91 Rookery Drive Rainford St.Helens Merseyside WA118BA
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	YES
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I believe the Local Plan put forward by St Helens council is fundamentally flawed and it is based on inaccurate data relating to housing need. In such cases unless there are exceptional circumstances of which St Helens council have not brought forward there is no need to destroy Green belt land. Other reasonable alternatives have not been sought including using more previously developed land. Such alternatives would have a less damaging effect on the environment and lead to less need for infrastructure.

Site 8HA as described in the local plan is next to an industrial area which itself poses risks of pollution. The site is Grade 1 agricultural land and is actively farmed providing employment and economic growth.

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

St Helens council should use the standard method to calculate housing need and consider other reasonable alternatives on already previously developed land.

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

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

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

Response Date	3/13/2019 3:42:47 PM
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RO0266

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

Ref: LPSD
30 APR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

891

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MARK</u>	First name: _____
Last Name: <u>CADWELL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 MOULFIELD ROAD</u>	Address: _____
<u>DENTONS GREEN</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6AU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	mail: _____

Signature: _____	Date: _____
------------------	-------------

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

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

☐ Yes (via email)

☐ No

Please note - 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
(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.**

RO0267

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

Representation (i.e. Comment) Form

Ref: LPSD
30 APR 2019
(For official use only)

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

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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.

892

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SONIA</u>	First name: _____
Last Name: <u>CROWELL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 MOORFIELD ROAD</u>	Address: _____
<u>DENTONS GREEN</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6AU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	mail: _____

Signature: _____	Date: <u>21.4.19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☐ Yes (via email)

☐ No

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

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:

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St.Helens Town Hall
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or by email to:

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

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

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

RO0268



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: DONNA	First name:
Last Name: CALLAND	Last Name:
Organisation/company: _____	Organisation/company:
Address: 7 PETUNIA CLOSE ST. HELENS	Address:
Postcode: WA9 4ZU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 22nd MARCH 2019
-----------------------	-----------------------

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

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

Yes ☒ (Via Email)

No ☐

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

RO0269



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part 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.

13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: DAVID

Last Name: CALLAWAY

Organisation/company: _____

Address: 12 ANDROMEDA WAY

NEW BOLD GREEN

ST HELENS

Postcode: WA9 4ZD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11.3.19

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

**Now please complete PART B of this form,
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**Please use a separate copy of Part B
for each separate comment/representation.**

RO0270



St. Helens
Council

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

Ref: LPSD

(For official use only)

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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.

1357
13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: CHRISTINE

Last Name: CALLAWAY

Organisation/company: RETIRED

Address: 12 ANDROMEDA WAY

ST HELENS

Postcode: WA9 4ZF

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 11.3.2019

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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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

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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.**

RO0271

Representor Details

Web Reference Number	WF0443
Type of Submission	Web submission
Full Name	Mrs Wendy Callery
Organisation	
Address	18 Crocketts Walk Eccleston St Helens Merseyside WA105DU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	GREEN BELT REVIEW(2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

I believe 8hs and 3hs should remain in the green belt. There will be a substantial loss of grade 1 and 2 agricultural land with a negative impact on farming and distribution jobs.

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan

The housing need assessment does not use standard methodology and no case for exceptional circumstances has been made

The plan promotes unsustainable traffic growth causing severe traffic issues at Bleak Hill road, Windle island that will not satisfy the NPPF (2016)

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

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

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

Response Date	2/25/2019 12:08:59 PM
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RO0272

Sine JHS

EL0279

① - LPA06



Representation on LPSD
calvert michael
to:
planningpolicy
09/05/2019 22:02



From:

Mr Michael Calvert, of

3 Hill School Road

St Helens

Merseyside

WA10 3BH



Email:



I STRONGLY OBJECT to the proposed LPSD and am writing this email because the jargon filled form you would prefer is unintelligible. There are many reasons, see below, for my objections, particularly to the proposed designation for housing on the Green Belt land, currently occupied by the Eccleston Park Golf Course.

1. It is very suspicious that since the site was acquired by the Cheshire based housing developer Mulbury Homes that the land is now being proposed to be taken out of the Green Belt, so that it can be used for housing. This smacks of corruption, and if the proposed plan is not changed to prevent development then I would suggest that an investigation needs to be carried out to ensure that any corrupt practices are brought to light.
2. It seems contrary to the need to tackle the obesity issue in St Helens to remove a space, which provides for healthy exercise in the outdoors. Where is the sense in this proposal?
3. If the proposal was to go ahead, who is going to deal with the Local Infrastructure issues, such as:
 1. The already severe congestion on the surrounding highways to which the development would add.
 2. The provision of health, education and other key services are already stretched, and would be tipped over the edge by the planned considerable increase in demand. How can this be called planning?
4. The release of Green Belt for housing development should as a matter of principle be a measure of last resort, otherwise we might as well just tarmac over the countryside, with all the ecological and environmental implications that has. Only once existing derelict land has

①

been utilised and defunct housing has been brought up to 21st Century standards should development on Green Belt be even contemplated.

J ①

Please keep me informed of progress by email.

RO0273

Representor Details

Web Reference Number	WF0235
Type of Submission	Web submission
Full Name	Mr Paul Campbell
Organisation	Mrs
Address	12 Moss Lane Windle WA11 7QD
Agent Details	

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

No

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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.

Regarding 8HS

① 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.

② 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.

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

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

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

Reinstate 8HS back into Green Belt and instead re-develop available brownfield sites.

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

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

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

Response Date	3/10/2019 7:50:39 PM
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RO0274

Representor Details

Web Reference Number	WF0236
Type of Submission	Web submission
Full Name	Mrs Nicola Campbell
Organisation	Mrs
Address	12 Moss Lane Windle WA11 7QD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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

Positively prepared, Justified, Effective

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.

Regarding 8HS

① 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.

② 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.

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

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

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

Reinstate 8HS back into Green Belt and instead re-develop available brownfield sites.

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

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

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

Response Date	3/10/2019 7:50:21 PM
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RO0275

324

Ref: LPSD



St. Helens
Council

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

07 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

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

1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: MALCOLM

Last Name: CAMPSEY

Organisation/company: RETIRED

Address: 4 BROOKSIDE CLOSE,

HAYDOCK,

ST. HELENS

Postcode: WA11 0UQ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 25th Feb 2019

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

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 SITE ZH1,		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? <i>Don't Know</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>Not justified, the Council should put strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are the extra people coming from?</i></p> <p><i>The release of Greenbelt will cause significant harm to the purpose of the Greenbelt, particularly farming.</i></p> <p><i>The access to the site is inadequate, a left in/left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highway system. There would be problems of inter-running through the proposed development.</i></p>

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

"Delete this land from the 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)

	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.

RO0277



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

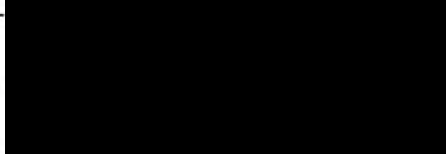
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

13 MAY 2019
1410

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>Neil</u>	First name:
Last Name: <u>Canning</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>Tonstalls Farm</u>	Address:
Postcode: <u>WA9 4QJ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

RO0278

Representor Details

Web Reference Number	WF0023
Type of Submission	Web submission
Full Name	Miss Jacquie Capper
Organisation	cheshire mouldings
Address	7 normans road sutton WA9 4JQ
Agent Details	jacquie capper

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

Yes (via e-mail)

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

Policy	local plan 2020-2035 submission draft
Paragraph / diagram / table	
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?	Yes

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

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

we support this allocation we are the owners of some land at 4ha

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	3/20/2019 4:29:15 PM
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RO0279

(624)

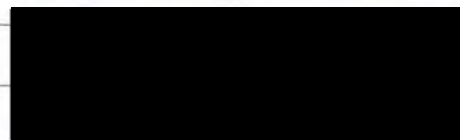
I GIVE EXPLICIT PERMISSION FOR MY
NAME TO BE USED IN THIS RESPONSE.

ANDREW CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



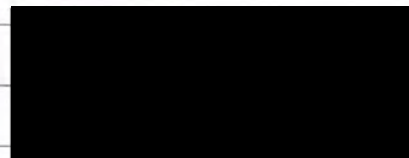
10/3/19.

HELEN CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



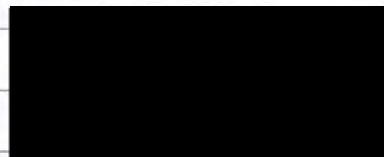
10/3/19

LEAH CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



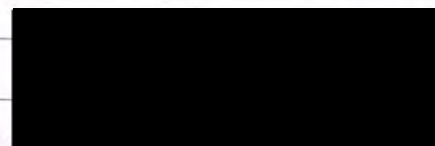
10/3/19

DANIEL CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



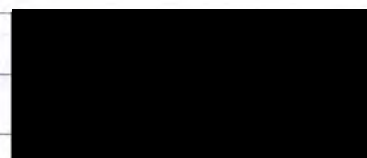
10/03/19

ALAN CARBERRY
83 HEATHFIELD AVENUE
ST HELENS WA9 5HW



11-03-19

GLORIA CARBERRY
83 HEATHFIELD AVENUE
ST HELENS WA9 5HW



11.03.19

WE HAVE WORKED TOGETHER ON THIS
RESPONSE.



St. Helens
Council

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: ANDREW

Last Name: CARBERRY

Organisation/company: N/A

Address: 47 MOOREWAY

RAINHILL

PRESCOT

Postcode: L35 6PD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

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 future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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setting out your representation/comment.**

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Justified?	<input checked="" type="checkbox"/>
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Please continue on a separate sheet if necessary
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N/a.

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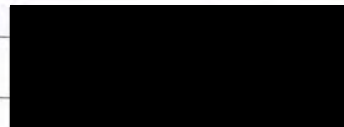
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RO0280

(624)

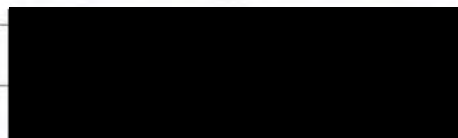
I GIVE EXPLICIT PERMISSION FOR MY
NAME TO BE USED IN THIS RESPONSE.

ANDREW CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



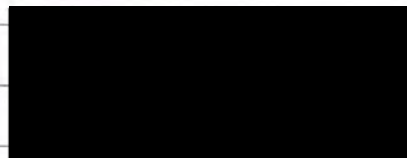
10/3/19.

HELEN CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



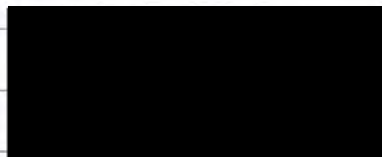
10/3/19

LEAH CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



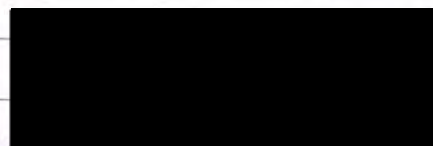
10/3/19

DANIEL CARBERRY
47 MOOREWAY
RAINHILL L35 6PD



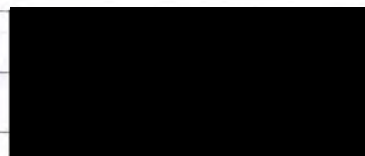
10/03/19

ALAN CARBERRY
83 HEATHFIELD AVENUE
ST HELENS WA9 5HW



11-03-19

GLORIA CARBERRY
83 HEATHFIELD AVENUE
ST HELENS WA9 5HW



11.03.19

WE HAVE WORKED TOGETHER ON THIS
RESPONSE.



St. Helens
Council

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: ANDREW

Last Name: CARBERRY

Organisation/company: N/A

Address: 47 MOOREWAY

RAINHILL

PRESCOT

Postcode: L35 6PD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 12/3/19

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☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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RO0281



St. Helens
Council

693

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

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Title: MRS	Title:
First Name LINDSEY	First name:
Last Name: CAREY.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SHELBOURNE DRIVE HINDLEY VICAR	Address:
Postcode: WN2 3NE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [Redacted]	Date: 3/3/19.
-----------------------	---------------

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No ☐

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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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.

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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).

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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.

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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.

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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 guesstimate 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, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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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.**

RO0282



St. Helens
Council

705

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 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

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name <u>SHANE</u>	First name:
Last Name: <u>CAREY.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SHELburne Drive</u> <u>HINDLEY, LIVERPOOL.</u>	Address:
Postcode: <u>WN2 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature

Date:

4/3/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.	
The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):	
a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.	
b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';	
c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.	
d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.	

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 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.

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO0283



RE: LOCAL PLAN REPRESENTATION
carr michael
to:
planningpolicy, [REDACTED]
13/03/2019 10:22



1 Attachment



LOCAL PLAN REPRESENTATION MADE BY MR MIKE CARR.pdf

Dear Sir/Madam,

further to the online representation that I made this morning, please see the attached formal representation setting out my comments in relation to the Local Plan process and Parcel GBP 098.

Please can you confirm receipt?

Regards

Mike Carr

THIS REPRESENTATION RELATES TO THE PROPOSED DEVELOPMENT PARCEL GBP 098 - LAND SOUTH OF A580 EAST LANCASHIRE ROAD AND EAST OF HOUGHTONS LANE, WINDLE - DEVELOPMENT SITE TO BE REMOVED FROM THE GREEN BELT, BUT TO BE SAFEGUARDED FOR FUTURE.

FUTURE REPRESENTATIONS.

I would like to make it clear at this stage that I wish to take part in any forthcoming Inquiry into the adoption of the Local Plan. I am happy to make verbal representations to the Planning Inspector and to be cross-examined by the Council Counsel and the Counsels that are likely to represent the developers who have an interest in developing land in the Borough, which the Local Planning Authority (LPA) proposed to be released from the Green Belt.

BACKGROUND COMMENTS

St Helens Council (The LPA) sets out its position in relation to the release of land from the Green Belt, identifying that this process and the release of proposed development sites, would somehow result in “a balanced plan for a better future”. The underpinning arguments are that the Borough needs to release this land from the Green Belt to support the provision of much needed new homes and sites for commercial development, despite there being no robust evidence to support such a concept.

In addition, it is quite clear that there is ample brownfield land and other more sustainably located and less constrained green belt land, which would allow the LPA to provide new homes and employment land if such an argument stands up to reasonable scrutiny.

In reality, it seems clear from the sites that are proposed to be released from the green belt, provide ‘easy’ options for the developers that they will rely on to develop these site. This would be detrimental to the residents of the Borough and would cause a level of harm that is unjustified and unsustainable.

THE CURRENT POSITION IN RELATION TO THE PROPOSED RELEASE OF LAND SOUTH OF A580 EAST LANCASHIRE ROAD AND EAST OF HOUGHTONS LANE, WINDLE

The most up to date document offered by the LPA is the Green Belt Review December 2018. This document provides the LPA’s current position in relation to sites, which it intends to take forward to the formal adoption stage through the Inquiry process.

Whilst there are considerable negative arguments to be made in relation to the proposed release of other sites in the Borough, this statement relates specifically to parcel GBP 098.

Taking this into account, the Green Belt Review December 2018 identifies that:-

- This large parcel (GBP 098) is located outside the edge of the current urban area to North West of Windle and Eccleston. Although the parcel was proposed by the Council as an allocated site at the LPPO stage, a number of constraints affect it that would have a

significant impact on the NDA and the deliverability of development within it. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this parcel.

The parcel has well defined boundaries formed by existing housing and adjacent highways. However, it constitutes a substantial green field site which provides high quality agricultural land. Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge. These factors mean that the release of the parcel for development, and the timing of its development, would need to be carefully justified in the light of the Council's objective of making efficient use of previously developed land to meet development needs.

Significant improvements to highways infrastructure would also be required to support the successful development of the parcel. It would not be possible to provide vehicular access (except for potentially a very limited number of dwellings) directly from the estate roads from the south due to existing capacity issues along small estate roads and junctions. As a result, access is likely to be primarily from Houghton's Lane, which is currently a narrow country lane which would require a substantial upgrade and realignment through the parcel and a new junction to link with the A580. Significant improvements would also be likely to be needed to public transport facilities including (due to the scale of the parcel) a new bus route through the parcel.

The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area. Any proposed development would need to be informed by a suitable ecological study informed by wintering bird surveys. If the use of the parcel by the relevant species is confirmed, a mitigation strategy (which may need to be of substantial scale given the size of habitat which may be affected) would need to be agreed and implemented, probably using land which is outside the parcel. This process is likely to take a considerable period of time. Development would only be acceptable if a suitable and deliverable mitigation strategy is agreed.

A further factor that needs to be considered is the availability of schools capacity and other social infrastructure. Given the scale of the parcel it is possible that a new primary school will be required and potentially upgrades to other social infrastructure and amenities.

The parcel is also affected by a number of other constraints as set out below. It is considered that these can be addressed within the master planning of a new development.

A buffer of approximately 20m would be required to protect Windle Brook (a designated LWS, which runs through the site). This can be readily accommodated as part of the green infrastructure to serve development within the parcel.

Two UU pipelines, including a main combined sewer, run through the site from its north-eastern to south western corners. Their size and location is likely to limit the residential capacity of the parcel.

Due to the parcel's proximity to the A580 a significant buffer (with a minimum width of 40m) would be needed, together with other attenuation measures, to mitigate the impacts of noise and air pollution from the road.

The 2018 SA concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of likely negative effects in relation to biodiversity, landscape sensitivity, agricultural land and the historic environment. Whilst these effects (with the exception of the loss of agricultural land) are considered to be likely to be capable of being suitably mitigated this will impact on the phasing of development.

In summary, the parcel is considered suitable for removal from Green Belt. However, having regard to all the factors described above, it is now recommended that the parcel be safeguarded (in order to meet potential housing needs beyond the Plan period) rather than allocated for development.

KEY COMMENTS MADE BY THE LPA IN ITS CURRENT ASSESSMENT RELATING TO PARCEL GBP 098

1. Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge.

This statement by the LPA clearly supports the conclusions that the allocation of this land in the local plan would conflict with the fundamental aim of Green Belt policy, which is to prevent urban sprawl by keeping land permanently open.

It also identifies the purposes of including land within the Green Belt as being:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The release of parcel GBP 098 would conflict with the fundamental aim of the Green Belt and with points 1, 2, 3 & 5 set out above.

2. The constraint parameters set out by the LPA at the start of this process where pre-selected by the LPA, and DID NOT allow all the sites put forward to be properly and lawfully assessed in relation to the constraints attached to each particular site. Whilst the LPA are allowed a certain amount of flexibility in terms of the assessment parameters they set, what is clear is that any LPA MUST take into account the requirements of applicable planning guidance, which specifically relates to site constraints.

Taking this into account, the initial green belt review set out an extremely limited criteria base, so as to assess the suitability of site in terms of their importance to the Boroughs green belt. This initial aims of the review appear to have discounted/included sites on that

basis only. I say this because of the many examples of the site allocation process set out in the NPPF (2012 & 2018) and the NPPG, which set out specific rules and guidance through which LPA's consider planning applications and allocate sites through the Local Plan process.

In particular, and amongst other site constraints, there is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system.

Further to the above, and through the initial allocations process, the LPA set out a site parameter test of 2/3 of a site not being covered by fluvial flooding. This is something that the LPA appear to have made up, without any reference whatsoever as to the requirements of Paragraph 100 of the 2012 NPPF.

Such an approach is fundamentally incorrect.

At the time of the initial green belt review, the 2012 NPPF provided the governing planning rules attached to all elements of the planning process. In terms of flooding, Section 10 - Meeting the challenge of climate change, flooding and coastal change set out the Government's policies. In this case, paragraph 100 identified the following:-

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

THE SEQUENTIAL TEST REQUIREMENTS SET OUT IN THE 2012 NPPF AND THE CURRENT DOCUMENT ARE LEGAL REQUIREMENTS THAT FOR PART OF THE LOCAL PLAN PROCESS AND THE DECISION MAKING PROCESS.

THE LPA'S APPROACH TO PARCEL GBP 098 IN TERMS OF FLOOD RISK

I attended the meeting at St Julies and discussed this with [REDACTED]. I asked him where the Sequential test document was, through which the Council assessed sites in terms of flooding, as directed above. He advised me that there was a Flood Risk Assessment but no sequential test.

Such an approach is contrary to the requirements set out in the NPPF, and has resulted in the Parcel GBP 098 being left as a preferred option, despite there being many other sites identified in the Green Belt Review, that did not fall within an area of potential flooding, which paragraph 100 seeks to fundamentally avoid.

Such an approach by the LPA in this Local Plan process, indicates that the allocation of Parcel GBP 098 as a safeguarded development site, would be unlawful because the LPA HAVE NOT FOLLOWED THE LAWFUL REQUIREMENTS SET OUT IN THE NPPF.

So that there is no doubt as to the Governments approach, the updated 2019 NPPF version, sets out the same required process in Section 14, paragraphs 155 – 165 set out what is required.

[REDACTED] claimed that the Eccleston sites flooding issues could be dealt with through the development of the site at some time in the future, which is perhaps true. However, and what is essential to recognise is that St Helens Council did not follow the applicable policy and legally required directions set out in the NPPF, as it chose not to sequential test any sites that were susceptible to flooding and identified in a flood risk area.

Given that the Eccleston site was and still is promoted as one parcel of development land, the specific requirements attached to the site being sequentially tested have not been carried out. If this were a planning application, St Helens Council would be bound to refuse the planning application through lack of information.

Further to this, [REDACTED] a planning application in Congleton, whereby the refused planning application for residential development went to appeal. The Planning Inspector concluded that to all intents and purposes, the proposed development was acceptable. However, the site fell within a flood zone that required a sequential test to be carried out. This had not been done.

As such, because the requirements of the NPPF had not been followed, he could not allow the appeal.

In terms of St Helens Local Plan process and the allocation of site, the Eccleston site was not tested in any way, but remained as a preferred option. This is a failure of Policy and potentially makes its allocation unlawful.

THE CURRENT REVIEW

The current Green Belt Review December 2018 clearly identifies a significant series of planning constraints that should have formed part of the constraint parameters used at the start of this whole process. Those constraints, the LPA now identify as being a number of constraints affect it that would have a significant impact on the NDA and the deliverability of development within it. Those constraints are identified as:-

- The site is a substantial green field site which provides high quality agricultural land.
This is contrary to NPPG guidance
- Significant improvements to highways infrastructure would also be required to support the successful development of the parcel.
This is potentially contrary to the provisions of the NPPF
- The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area.
This is potentially contrary to the NPPF and in conflict with European Habitat Regulations
- The availability (or lack) of schools capacity and other social infrastructure. Given the scale of the parcel it is possible that a new primary school will be required and potentially upgrades to other social infrastructure and amenities.
This indicates that the allocation of this site would conflict with the 3 strands of sustainable development
- A buffer of approximately 20m would be required to protect Windle Brook (a designated LWS, which runs through the site).
This is contrary to the provisions off the NPPF as this site remained in the process, despite their being many sites that would have been sequentially preferable, if such a tet had actually been carried out.
- Two UU pipelines, including a main combined sewer, run through the site from its north-eastern to south western corners. Their size and location is likely to limit the residential capacity of the parcel.
This adds further to the potential of flooding on the site if there is a breakdown in pipeline infrastructure.
- Due to the parcel's proximity to the A580 a significant buffer (with a minimum width of 40m) would be needed, together with other attenuation measures, to mitigate the impacts of noise and air pollution from the road.

This suggest that the development of this site would be contrary to health and thereby conflict with the 3 strands of sustainable development.

CONCLUSIONS

The LPA's current 2018 Green Belt review sets out the substantial constraints that are applicable to this site. When read together, and taking into account all other relevant material planning considerations in relation to the position of the site within the Borough, it is entirely reasonable to conclude that the allocation of this site and any future development of the site would be unsustainable. This is due to such a development having clear and demonstrable adverse impacts on this part of the borough, thereby meaning that the allocation of the site does not represent sustainable development.

What is also clear is that if these constraints had been identified in the first instance, as the LPA were legally required to do through the provisions of the NPPF, then Parcel GBP 098 would most likely have failed the sequential test approach, although we will now never know.

As such, the LPA's failure to carry out its statutory responsibilities, despite claims that they can deal with flooding on the site through the development process, is at best misinformed, and at worst unlawful.

What is also clear is that the release of parcel GBP 098 would conflict with the fundamental aims of the Green Belt, and its allocation would conflict with 4 of the 5 purposes of including land within the Green belt. The LPA may argue that there are Very Special Circumstances that outweigh this harm, although when you consider the identified constraints of this site at the same time, there is no justifiable reason why Parcel GBP 098 should remain as a preferred site.

Representor Details

Web Reference Number	WF0115
Type of Submission	Web submission
Full Name	MR MIKE CARR
Organisation	
Address	17 BROOKSIDE AVENUE ECCLESTON WA10 4RN
Agent Details	MR MIKE CARR

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	PARCEL GBP 098
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

A REPORT WILL BE SENT TO THE PLANNING POLICY EMAIL TODAY. 13TH MARCH 2019

7. Please set out modification(s) you consider are necessary

THE REMOVAL OF PARCEL GBP 098 FROM THE LOCAL PLAN PROCESS

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I CONSIDER THIS NECESSARY BECAUSE I AM A CHARTERED TOWN PLANNER WITH SIGNIFICANT EXPERIENCE IN THIS TYPE OF PROCESS.

I CONSIDER THAT THE COUNCIL APPROACH TO THE INITIAL ALLOCATIONS PROCESS WAS UNLAWFUL, PARTICULARITY THAT IT SET SUCH A SMALL SERIES OF CONSTRAINT PARAMETERS SO AS TO SELECT SITES FOR ALLOCATION. THIS DID NOT COMPLY WITH THE REQUIREMENTS OF THE NPPF OR THE NPPG. IN PARTICULAR, THE LPA DID NOT FOLLOW THE LAWFUL REQUIREMENTS SET OUT IN

THE NPPF, WHICH REQUIRED PARCEL GBP 098 TO BE SEQUENTIALLY TESTED AGAINST OTHER AVAILABLE SITES THAT WERE LESS EXPOSED TO FLOODING.

SUBSEQUENTLY, THE PARAMETERS IDENTIFIED BY THE LPA WERE NOT LAWFUL, NOR ROBUST ENOUGH AND LET A SPECIFIC AND WHAT I CONSIDER TO BE PRE-SELECTED SITE INTO THE SELECTION PROCESS.

TAKING THE ABOVE INTO ACCOUNT, THE LPA'S GREEN BELT REVIEW DECEMBER 2018 NOW CLEARLY IDENTIFIES THE FOLLOWING IN RELATION TO THIS PARCEL -

"ALTHOUGH THE PARCEL WAS PROPOSED BY THE COUNCIL AS AN ALLOCATED SITE AT THE LPPO STAGE, A NUMBER OF CONSTRAINTS AFFECT IT THAT WOULD HAVE A SIGNIFICANT IMPACT ON THE NDA AND THE DELIVERABILITY OF DEVELOPMENT WITHIN IT"

THIS SUPPORTS MY CONCLUSIONS THAT THE ALLOCATION OF THIS SITE FOR DEVELOPMENT AT ANY STAGE WOULD, BECAUSE OF THE FLAWED ALLOCATIONS PROCESS, WOULD BE UNLAWFUL BECAUSE THE RULES SET OUT IN THE NPPF HAVE NOT BEEN FOLLOWED, THEREBY MAKING THE DEVELOPMENT OF THIS SITE UNSUSTAINABLE IN PRINCIPLE.

Response Date	3/13/2019 8:38:09 AM
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RO0284

① - LPA05 ② - IDP

Representor Details

Web Reference Number	WF0074
Type of Submission	Web submission
Full Name	Mrs Ali Carroll
Organisation	
Address	10 ansdell drive Eccleston Wa10 5dw
Agent Details	Mrs A Carroll 10 ansdell drive Eccleston, Wa10 5dw

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	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Economic growth predictions are based on flawed data.

Council estimates for housing needs based on older forecasts no longer applicable.

No reference to brownfield and previously developed land in the Plan.

No mention of grade 1 and 2 Agricultural land loss, i.e. not addressed in the Plan.

Infrastructure delivery plan fails to fully explain the impact on education and healthcare.

The Plan promotes unsustainable traffic growth.

①

②

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 1:13:09 PM
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RO0285



Objections to "The Local plan"

jeffmorticia

to:

planningpolicy

13/05/2019 18:08

① - LPA05



Dear Sir or Madam,

I am writing to add my objections to the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local plan").

Narrow minded councillors believe that decimating our local green belt will somehow build a better town regardless of immense opposition from local residents. It is this ridiculous green belt land grab policy that has since cost you seats on the local council not, according the leader of the council, Brexit!

(<https://www.sthelensstar.co.uk/news/17617103.st-helens-council-leader-blames-brexit-for-local-election-defeats/>)

My reasoning for objecting to your current plans are listed below;

Traffic: There is already an excessive amount of traffic on the B5419 (Jubits and Chester Lane), particularly a great deal of HGVs travelling to local industrial estates. A development on site 5HA would create far too much traffic than the road can deal with safely. Such a dramatic increase in both works traffic and subsequent residential traffic will mean that it is only a matter of time before there is a serious or worse, fatal accident.

Heavy Goods vehicles: There are already a great deal of commercial sites nearby (Lea Green, Reginald Road, Scorecross) that create too much heavy goods traffic on our local roads. Creating commercial units on site 5HA would have a detrimental effect on roads, houses, pathways, air quality and safety.

Highway Safety: it is already difficult to cross Jubits Lane and Chester Lane safely, increasing the traffic will increase the dangers to pedestrians. ①

Current Planning Applications: A development on the brownfield site of Brickfields (formerly Ibstock) is in the planning stages. Two large scale developments are not needed in the area. Developing brownfield sites does not impact the natural aspects of the area while allowing the council to still hit housing targets.

Amenities: Bold, Sutton Manor and Clock face do not have the local amenities for such a large scale development. There are not enough spaces in local GP's, schools and nurseries to allow for large scale development in the area. It is almost impossible for current residents within the Clock Face, Sutton Manor area to get an appointment within the 1 local GP practice. The local community centre (Chester Lane) has already been closed and the local library threatened.

Bin Collections: Despite the massive increase in council tax over the last six years the Labour councils ridiculous plans to extend to three weekly bin collections already bring massive health concerns to residents. Allowing any development within the area would push bin collections to breaking point and delay them further.

Bold Forest Park Plans: Allowing development in the Sutton Manor, Clock Face areas would have such a massive detrimental effect on the new and exciting plan for the Bold Forest Park. The local area needs an environmental development like this to bring visitors and businesses to the area. Allowing residential or commercial development would put that in jeopardy and negate any of the benefits to the local area.

Noise: Traffic noise is already high in this area with some very heavy traffic travelling to and from current residential and commercial estates. Increasing residential and commercial development sites would increase that exponentially affecting local residents and wildlife alike, especially in the much treasured Forestry Commission sites within the area. ①

Air Quality: commercial and even residential developments would have detrimental health effects on local residents, especially those already suffering with respiratory or breathing illnesses. Wildlife in the area,

especially the Forestry Commission sites would also be affected.

Loss of privacy; most residents on Jubits Lane relocated to the area due the high level of privacy of the houses on the road. A commercial or residential development would mean the houses become greatly overlooked losing the privacy residents currently enjoy.

Visual impact; with Bold Forest Park and other land from the Forestry Commission, Sutton Manor and Bold are scenic areas to be proud of. Building in these areas this natural beauty, used by walkers, runners, dog walkers and other clubs, will leave a scar on the local landscape.

Jobs; There are certainly not enough jobs within the local area to account for such a large development and with a massively declining Town Centre, do not look like being created in the future.

I hope the Council see, that by losing Council seats in the areas where they plan to destroy the Green belt, their plans have fierce opposition. The green belt within St Helens should remain untouched for generations to enjoy. It is time to rethink this current housing strategy. I do appreciate that under national government targets, there is a need for some new homes to be built, but using green belt land is not the best way to meet these targets but is simply the easy way.

Sincerely

Jennifer Carter

74 Jubits Lane

Sutton Manor

WA9 4RU



Sent from my Samsung Galaxy smartphone.

RO0286

① - LPAOK



Objections to "The Local Plan"

to:

planningpolicy

13/05/2019 18:20

Dear Sir or Madam,

I am writing to add my objections to the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local plan").

Narrow minded councillors believe that decimating our local green belt will somehow build a better town regardless of immense opposition from local residents. It is this ridiculous green belt land grab policy that has since cost you seats on the local council not, according the leader of the council, Brexit! (<https://www.sthelensstar.co.uk/news/17617103.st-helens-council-leader-blames-brexit-for-local-election-defeats/>)

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Heavy Goods vehicles; There are already a great deal of commercial sites nearby (Lea Green, Reginald Road, Scorecross) that create too much heavy goods traffic on our local roads. Creating commercial units on site 5HA would have a detrimental effect on roads, houses, pathways, air quality and safety.

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Amenities; Bold, Sutton Manor and Clock face do not have the local amenities for such a large scale development. There are not enough spaces in local GP's, schools and nurseries to allow for large scale development in the area. It is almost impossible for current residents within the Clock Face, Sutton Manor area to get an appointment within the 1 local GP practice. The local community centre (Chester Lane) has already been closed and the local library threatened.

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I hope the Council see, that by losing Council seats in the areas where they plan to destroy the Green belt, their plans have fierce opposition. The green belt within St Helens should remain untouched for generations to enjoy. It is time to rethink this current housing strategy. I do appreciate that under national government targets, there is a need for some new homes to be built, but using green belt land is not the best way to meet these targets but is simply the easy way. ✓

Sincerely

David Carter

74 Jubits Lane

Sutton Manor

WA9 4RU

Sent from my Samsung Galaxy smartphone.

RO0287



St. Helens
Council

767

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DAVID	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14, ROSE PLACE RAINFORD ST HELENS	Address:
Postcode: WA 11 8QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 9/3/2019
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

**Please use a separate copy of Part B for each
separate comment/representation.**

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				1 OBJECT TO ALL POLICIES -			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is <u>not</u> ... Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

BROWNFIELD FIRST POLICY? BHA IS GRADE 1 FARMLAND, BUILDING HERE WILL IMPACT FARMERS AND THEIR EMPLOYEES LIVELIHOODS. THERE ARE MANY BROWNFIELD SITES IN ST HELENS. FLOODING IS ALREADY A PROBLEM, WATER THAT SETTLES ON THIS FIELD WOULD BE FORCED FURTHER DOWN TO PASTURE LANE / CHURCH RD.

BUILDING THESE HOUSES WOULD LEAD TO A HUGE INCREASE IN TRAFFIC CREATING AIR AND NOISE POLLUTION AND ADDING TO CONGESTION ON THE ROADS AND INCREASING ALREADY DIFFICULT PARKING.

SCHOOLS AND DOCTORS ARE ALREADY DIFFICULT TO GET A PLACE / APPOINTMENT.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0288



St. Helens
Council

769

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: IAN	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ROSE PLACE RAINFORD ST HELENS	Address:
Postcode: WA11 8QG	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date:

9/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				I OBJECT TO ALL POLICIES					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

SHOULD BE BROWNFIELD FIRST, SHA IS GRADE 1 FARMLAND
BUILDING HERE WILL IMPACT ON FARMERS & EMPLOYEES
LIVELIHOODS.
FLOODING IS ALREADY A PROBLEM ON SHA & HIGHER LANE
BUILDING WILL TRANSFER THE WATER TO THE LOWER
LYING AREAS I.E. PASTURE LANE / CHURCH ROAD.
259 HOUSES WILL LEAD TO A HUGE TRAFFIC INCREASE
AND THE ASSOCIATED AIR/ NOISE POLLUTION.
THE PRESENT ROADS, SCHOOLS, DOCTORS, PARKING WILL
NOT COPE WITH BUILDING OF THIS SCALE

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
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RO0289



St Helens
Council

771

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: PATRICIA	First name:
Last Name: CARTER	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ROSE PLACE RAINFORD ST HELENS WALL BRG	Address:
Postcode:	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 9/3/19
-----------------------	--------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than **5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				I OBJECT TO ALL POLICIES.					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

8HA IS GRADE 1 FARMLAND, BUILDING HERE WILL IMPACT FARMERS AND THEIR EMPLOYEES.
BROWNFIELD FURT E.G. MOSS NOOK URBAN VILLAGE HAS HAD PLANNING PERMISSION FOR MANY YEARS AND WOULD HELP PROVIDE THE HOUSES NEEDED.
FLOODING IS ALREADY A PROBLEM ON THIS FIELD, BUILDING WOULD CAUSE PROBLEMS TO THE LOWER LYING AREAS OF PASTURE LANE AND CHURCH RD.
THIS PLAN WOULD LEAD TO A HUGE TRAFFIC INCREASE CREATING AIR & NOISE POLLUTION.
THE INFRASTRUCTURE OF RAINFORD IN TERMS OF ROADS, SCHOOLS, DOCTORS, PARKING ETC WOULD NOT BE ABLE TO COPE WITH A DEVELOPEMENT OF THIS SCALE.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ No, I do not wish to participate at the oral examination

☐ Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0290



{In Archive} St Helens Borough Local Plan: Submission Draft Town and Country Planning (Local Planning) (England) Regulations 2012

Case, John

to:

planningpolicy@sthelens.gov.uk

27/01/2019 15:07



Dear Sir/Madam,

Thanks you for your letter dated 15 January 2019.

I would like to object to the proposed housing development on Rookery Lane/Higher Lane known as 8HA.

My reasons are listed below:

- Grade A agricultural land.
- 250 Houses on this site seems massive.
- Already Rookery Lane and Higher Lane are dangerous roads and this development would increase the dangers.
- Access Roads out of Rainford are already congested at peak time, and this will exacerbate the congestion.
- With more cars and slower traffic pollution levels will increase – leading to possible health problems and maybe a shorter lifetime.
- The increase in the population of Rainford (maybe but 1000 people) will prove devastating for schools, doctors and dentists.
- Wildlife will be badly affected.
- Parking in Rainford village is now difficult, but an extra 250 – 500 cars will make it impossible to use the local shops.

I do appreciate that the council have reduced the number of proposed houses on green belt in St Helens and will use more Brown Field sites , but I'm very concerned about the effects of an extra 1,000 people and an extra 500 cars in a small village.

Yours faithfully,

John

John Case.

6 Eagle Crescent, Rainford, St Helens, WA11 8BG.

Representor Details

Web Reference Number	WF0371
Type of Submission	Web submission
Full Name	MR JOHN CASE
Organisation	
Address	6 EAGLE CRESCENT, RAINFORD. WA11 8BG
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Local Plan - HA8 - Rookery Lane
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

7. Please set out modification(s) you consider are necessary

Building on Greenbelt - HA8- Grade 1 Agricultural land should only be considered if all Brownfield sites have been assessed and used. Affordable housing is needed in St Helens.

This land provides employment.

HA8 is also near to an Industrial Estate and there have been explosions and fires in the recent past- seems dangerous.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/4/2019 9:34:03 AM
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RO0291



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: CATHERINE	First name:
Last Name: CASE	Last Name:
Organisation/company:	Organisation/company:
Address: 5 BUSHELS DRIVE CLOCK FACE ST HELENS	Address:
Postcode: WA94UZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

/ 4 / 2021

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

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RETURN DETAILS

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)

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0292



St. Helens
Council

618

12 MAR 2019

Ref: LPSD

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: TERESA	First name:
Last Name: CASH	Last Name:
Organisation/company:	Organisation/company:
Address: 15 PARK AVE ECCLESTON PARK PRESCOT	Address:
Postcode: L34 2QY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 - 3 - 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)No ☐

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St.Helens Council
Town Hall
Victoria Square
St.Helens
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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Green Belt Review (2018)			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Adequate regional and cross border collaboration has not been undertaken. ² 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 green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

X	No, I do not wish to participate at the oral examination
----------	---

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0293

EL0294

St Helens GBP-069_A
+ GBP-071

①-LPA05



Fw: Draft Local Plan - representations
Jonathan Clarke to: planningpolicy

14/05/2019 10:09

[REDACTED]

I attach the representation from Richard Cass.

This further e-mail came to me at 18.13 yesterday. However, assuming the text is the same as what he has previously submitted on line (i.e. the only thing which was missing was the photographs which our on line system can't handle) my inclination would be to accept this as a representation. ✓

Best Regards,

[REDACTED]
Development Plans Manager,
St Helens Council,
Town Hall Annexe
Corporation Street,
St Helens
WA10 1HF

[REDACTED]
----- Forwarded by [REDACTED] on 14/05/2019 10:06 -----

From: Richard Cass [REDACTED]
To: [REDACTED]
Date: 13/05/2019 18:13
Subject: RE: Draft Local Plan - representations

Dear [REDACTED],

Thanks for your email, the contents of which are noted.

I omitted to include the attachment to my earlier email, so here it is. The text is identical to the online representation, and the illustrations simply add clarity, so I trust they will be welcomed by the inspector. ✓

Kind regards

Richard.



Richard Cass

Chairman

The Cass Foundation

From: [REDACTED]
Sent: 13 May 2019 15:56
To: Richard Cass [REDACTED]
Subject: Re: Draft Local Plan - representations
Importance: High

Dear Richard,

Thank you for your e-mail.

I note that you refer to an attachment with illustrations which were not accessible to the on-line portal. However, this does not appear to be attached to your e-mail. As the deadline for responses to the consultation is 5.00 pm today, any material which has not already been submitted should reach us by that time.

If the team has any other enquiries about your representation (as part of the process of logging representations) they will contact you in due course.

On a further point, I realise I did not mention in the meeting that the existing adopted Bold Forest Action Area Plan (BFAAP) will of course remain in place after the Local Plan is adopted. This does identify (in Policy BFP INF4 on page 35) a Development Opportunity Site at Colliers Moss albeit not for residential and subject to various criteria.

Please contact me if you require any further details.

Best Regards,

[REDACTED]
Development Plans Manager,
St Helens Council,

Town Hall Annexe
Corporation Street ,
St Helens
WA10 1HF

Tel. 01744 676198

▼ Richard Cass ---13/05/2019 14:42:13---Dear Jonathan,

From: Richard Cass [REDACTED]
To: [REDACTED]
Date: 13/05/2019 14:42
Subject: Draft Local Plan - representations

Dear [REDACTED]

Further to our recent meeting and, in your absence last week, a telephone conversation with your colleague [REDACTED], I submitted representations on the Draft Plan on behalf of the Cass Foundation last week, via the online portal. To be on the safe side, and for your information, I enclose the representation document. This contains a number of illustrations which were not accessible to the online portal. ✓

I believe that there is a potentially highly valuable prize to enable the existing Colliers Moss Common to provide a far more valuable role in delivering the Council's policies and aspirations for the local community and the wider area embraced by the Forest Plan. I have indicated how this might be approached as part of the Local Plan process, although more specific and detailed proposals would require a great deal more work and consideration. The Cass Foundation would be interested in working with the Council and the Mersey Forest on this task. ✓

I would suggest to yourselves and the Inspector that the Plan should contain specific policies for the area which would facilitate this approach. I am aware that removing public space from the Green Belt for development purposes is a sensitive and contentious issue, but I am convinced that there is an opportunity to greatly improve the quality and value of the Forest Park if my approach is given serious consideration. As I say in my statement, I am confident that well considered development will enable the Forest Park to perform far better than it does at present, and make a positive contribution to the Park itself and to the local community.] ①

You will see that I believe that this approach would assist with the delivery of a wide range of Plan policies. Without the resources to deliver them, policies, however well-drafted, have no practical purpose. ✓

The Cass Foundation is a charity whose aim is to improve people's health by creating healthy place for them to live in. We would be delighted to work with the Council to achieve this at

Colliers Moss Common.

If you wish to discuss further, please let me know. Could you also confirm that the representations have been accepted for consideration. ✓

Kind regards

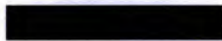
Richard.




Richard Cass

Chairman

The Cass Foundation



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reply e-mail and destroy and delete the message and all copies from your computer. "  -
ST HELENS LOCAL PLAN REPRESENTATIONS-with pics..pdf

Representor Details

Web Reference Number	WF0008
Type of Submission	Web submission
Full Name	Mr Richard Cass
Organisation	The Cass Foundation
Address	Osborne House West, Fulwood Park Liverpool L17 5AD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	The Green Belt Review 2018 Appendices B&C, Parts 4&5, sites 69A and 71.

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

ST HELENS LOCAL PLAN

REPRESENTATION FORM – PART 6.

1. The draft Local Plan designates two large strategic green spaces as remaining in the Green Belt with no allocation for housing or other development, Colliers Moss Common North(58.3ha) and Colliers Moss Common South(97.6ha). They are designated in the Green Belt Review as sites 69A and 71 respectively. The Green Belt Review went through a detailed assessment of both sites in Stage 1B - see Appendix B and C, Parts 4 and 5, pages 336-338.

2. In summary, both sites were given an overall significance score of 'High+' in their contribution to Green Belt Purpose and were not carried forward to the Stage 2 Assessment for further consideration for possible future development.

3. In contrast, Site 74(330ha), just to the South, was assessed as making a medium or low contribution to the Green Belt, was carried forward to the next stage. It is not the purpose of this representation to discuss the Plan's allocation of Site 74 for housing development, except where it might impact directly on Sites 69A and 71.

4. Historical context. Colliers Moss North and South form part of a major industrial complex dating back to 1875. This was focussed on Bold Colliery which was sited on the western part of Site 71, where there was large scale industrial development associated with the pit and associated industries. A small part of this industrial complex remains in the form of Bold Industrial Park, a 10.4ha parcel of developed land within the Green Belt. ✓

5. The remaining majority part of Site 71, and the whole of Site 69A were used as large-scale tips for the disposal of colliery waste materials over the life of the mine until its closure in 1985. Since then the two sites have been subject to extensive restoration, by a combination of land remediation, tree planting, and natural regeneration of vegetation. They form major elements of the Bold Forest Park. ✓

6. The other major element in the history of the area was the development of Bold Power Station after World War Two. This took place on previously undeveloped moss land, and made use of coal from the colliery and the adjacent railway for fly ash removal. At the time of its closure in the 1980s it was designated as an industrial site in the Green Belt. The then owner, National Power, commissioned regeneration consultants Cass Associates to explore options for its future. Following detailed work on site conditions, the site's relationship with St Helens, and potential development options, Cass Associates developed proposals for a 'hybrid' scheme involving a mixture of housing and open space. This involved a significant change in planning policy. ✓

7. This project was delivered during the 1990s. It involved a range of sophisticated techniques to deal with the serious challenges of the site, and a creative approach to masterplanning and design. It has led to the creation of an award-winning and highly successful 'place', in which high quality housing and new multi-functional open space are closely integrated. It is a demonstration of many of the strategic aims being promoted by the draft local plan, including:

- Regeneration and Growth.
- Quality Development.
- Accessible St Helens.
- Meeting Housing Need.
- Quality of Life.

8. In policy terms it has an impact on, and forms a practical demonstration of how to deliver a wide range of policies, including:

- LPA09 Green Infrastructure.
 - LPA11 Health and Wellbeing.
 - LPC05 Open Space.
 - LPC06 Biodiversity.
 - LPC07 Greenways.
 - LPC08 Ecological Network.
 - LPC09 Landscape Protection and Enhancement.
 - LPC10 Trees and Woodland.
 - LPC12 Flood Risk and Water Management.
 - LPD01 Ensuring Quality Development.
 - LPD02 Design and Layout of New Housing.
 - LPD03 Open Space and Residential Development.
- ✓

9. Relevance to the Draft Local Plan. At present the open spaces forming Colliers Moss Common, fall well short of their potential to meet the objectives of the Plan. Although green and open, and with significant landscape and ecological value, they are suffering from lack of investment and management, and as a result are relatively little used, neglected and suffering from anti-social behaviour. }

10. Colliers Moss Common North (Site 69A), has a poor relationship to its surrounding areas, which are predominantly housing. The surrounding community is one of the most disadvantaged in St Helens and suffers from multiple levels of deprivation. Access to the Common is relatively unattractive. Levels of anti-social behaviour and fear of crime are both major factors in this. } ①

11. Although there are a number of small, recent and on-going infill housing developments around the perimeter, these have little or no relationship to the Common, which remains relatively hidden and inaccessible within the local area. Other uses are referred to as inappropriate to the Green Belt in the GB Review, including scrap yards and other small-scale industries. ✓

12. It is recommended therefore that the policies for this area are reviewed so as to enable it to deliver more effectively on the strategic aims and policies of the Plan, as set out above. They should be based on a more thorough consideration of how the area performs at present, and how it could be improved to increase its quality and value. The review should include carefully considered housing development which could simultaneously improve the physical relationship between the Common and the local community, and generate financial resources which could be invested in the improvement of the Common. This would also provide better quality and wider choice of housing to satisfy local housing need. Other development compatible with the policy objectives, such as community, leisure and health facilities for example, should also be considered. (1)

13. Colliers Moss Common South. The part of this large area of green space for which policies should be reviewed is the land surrounding the Bold Business Park (Site GBP072) and adjacent to the Colliers Moss housing and green space site. The three sites taken together have a potentially strong relationship which, if appropriately developed, would allow the Plan to deliver more effectively on its objectives. This area also forms the link across the railway to the South Common and the south-east part of the town. (1)

14. The open space is designated as a recreational area, and has a network of footpaths and informal recreation facilities set within a maturing landscape of woodland, grassland, lakes and wetland areas. As in the South Common it suffers from lack of resources for development and management. This results in it being relatively little used, and subject to anti-social behaviour and a generally unwelcoming, insecure character for many people. The contrast with the green space around the adjacent housing, which is attractive and well used, is striking. ✓ (1)

15. It is recommended that the policies for this area are amended so as to explore carefully considered housing development in the area under consideration. This has the potential to deliver significant benefits:

- Providing a suitable location for high quality housing to meet local need; consideration could be given to special circumstances such as a care village, eco-development, mixed live/work housing. This would fit well with the concept of the garden suburb put forward for Site 74 immediately to the south, to which it would link. (1)
- Correctly planned, new development could integrate with, and reduce the relative isolation of, the business park and the existing housing at Colliers Moss. This would improve the sustainability of the area and allow better provision of housing mix, access and other infrastructure.
- Well designed new development could make access to the open space areas safer and more attractive, deterring antisocial behaviour and bringing increased use.
- It has the potential to create a sense of arrival to the whole open space complex, including the bridge over the railway to the North Common. This at present is isolated, little used, poorly maintained and unsightly. (1)
- New housing would generate the financial resources to fund an endowment, locked to the benefit of the Common and Forest Park, delivering improvements and long-term management. This would enable them to make a much greater contribution to the Local Plan. This long-term approach has the support of Community Forest Land Trust, the owner of Colliers Moss Common North (Site 69A).

16. This proposal is not put forward simply as 'enabling' development, in which policies are set aside for an acceptable gain or compensation, but rather as an inherent good in its own right. The loss of functionality of the Green Belt in terms of restricting sprawl, maintaining openness or settlement separation is not regarded as significant, provided that the development is carefully considered and aimed at delivering the major potential wider benefits to the character and function

of the Green Belt. The 'exceptional circumstances' justification is appropriate in this context. The regeneration of the power station site provides a clear demonstration of how an integrated, enlightened approach can deliver high quality open space in association with new housing, and make a highly effective contribution to the delivery of a wide range of Plan policies.

1

7. Please set out modification(s) you consider are necessary

1. It is recommended that the policies for Colliers Moss Common North are reviewed so as to enable it to deliver more effectively on the strategic aims and policies of the Plan, as set out above. They should be based on a more thorough consideration of how the area performs at present, and how it could be improved to increase its quality and value. The review should include carefully considered housing development which could simultaneously improve the physical relationship between the Common and the local community, and generate financial resources which could be invested in the improvement of the Common. This would also provide better quality and wider choice of housing to satisfy local housing need. Other development compatible with the policy objectives, such as community, leisure and health facilities for example, should also be considered.

2. It is recommended that the policies for Colliers Moss Common South are amended so as to explore carefully considered housing development in the area identified above. This has the potential to deliver significant benefits:

- Providing a suitable location for high quality housing to meet local need; consideration could be given to special circumstances such as a care village, eco-development, mixed live/work housing. This would fit well with the concept of the garden suburb put forward for Site 74 immediately to the south, to which it would link.

- Correctly planned, new development could integrate with, and reduce the relative isolation of, the business park and the existing housing at Colliers Moss. This would improve the sustainability of the area and allow better provision of housing mix, access and other infrastructure.

- Well designed new development could make access to the open space areas safer and more attractive, deterring antisocial behaviour and bringing increased use.

- It has the potential to create a sense of arrival to the whole open space complex, including the bridge over the railway to the North Common. This at present is isolated, little used, poorly maintained and unsightly.

- New housing would generate the financial resources to fund an endowment, locked to the benefit of the Common and Forest Park, delivering improvements and long-term management. This would enable them to make a much greater contribution to the Local Plan. This long-term approach has the support of Community Forest Land Trust, the owner of Colliers Moss Common North (Site 69A).

3. These proposals are not put forward simply as 'enabling' development, in which policies are set aside for an acceptable gain or compensation, but rather as an inherent good in their own right. The loss of functionality of the Green Belt in terms of restricting sprawl, maintaining openness or settlement separation is not regarded as sufficiently significant in relation to the potential benefits to the Green Belt, provided that the development is carefully considered and aimed at delivering the major potential wider benefits to the character and function of the Green Belt. The 'exceptional circumstances' justification is appropriate in this context. The regeneration of the power station site provides a clear demonstration of how an integrated, enlightened approach can deliver high quality open space in association with new housing, and make a highly effective contribution to the delivery of a wide range of Plan policies.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Development in the Green Belt and the potential loss of open space can be contentious. The issues raised in this representation require careful explanation and consideration, and go beyond a simple statement of policies and potential revisions. The Inspector may be assisted by a more thorough examination of the issues raised and the methods available for their resolution. ✓

Response Date	5/10/2019 5:19:58 PM
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ST HELENS LOCAL PLAN

REPRESENTATION FORM – PART 6.

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2. In summary, both sites were given an overall significance score of 'High+' in their contribution to Green Belt Purpose and were not carried forward to the Stage 2 Assessment for further consideration for possible future development. ✓
3. In contrast, Site 74(330ha), just to the South, was assessed as making a medium or low contribution to the Green Belt, was carried forward to the next stage. It is not the purpose of this representation to discuss the Plan's allocation of Site 74 for housing development, except where it might impact directly on Sites 69A and 71.
4. **Historical context.** Colliers Moss North and South form part of a major industrial complex dating back to 1875. This was focussed on Bold Colliery which was sited on the western part of Site 71, where there was large scale industrial development associated with the pit and associated industries. A small part of this industrial complex remains in the form of Bold Industrial Park, a 10.4ha parcel of developed land within the Green Belt. ✓
5. The remaining majority part of Site 71, and the whole of Site 69A were used as large-scale tips for the disposal of colliery waste materials over the life of the mine until its closure in 1985. Since then the two sites have been subject to extensive restoration, by a combination of land remediation, tree planting, and natural regeneration of vegetation. They form major elements of the Bold Forest Park. ✓
6. The other major element in the history of the area was the development of Bold Power Station after World War Two. This took place on previously undeveloped moss land, and made use of coal from the colliery and the adjacent railway for fly ash removal. At the time of its closure in the 1980s it was designated as an industrial site in the Green Belt. The then owner, National Power, commissioned regeneration consultants Cass Associates to explore options for its future. Following detailed work on site conditions, the site's relationship with St Helens, and potential development options, Cass Associates developed proposals for a 'hybrid' scheme involving a mixture of housing and open space. This involved a significant change in planning ✓

policy.



7. This project was delivered during the 1990s. It involved a range of sophisticated techniques to deal with the serious challenges of the site, and a creative approach to masterplanning and design. It has led to the creation of an award-winning and highly successful 'place', in which high quality housing and new multi-functional open space are closely integrated. It is a demonstration of many of the strategic aims being promoted by the draft local plan, including:

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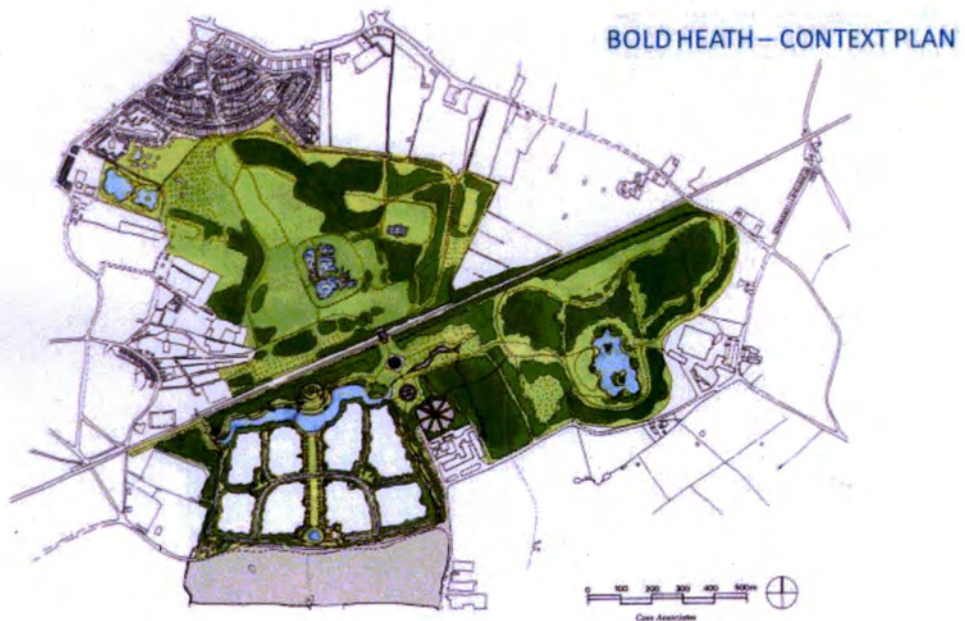
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- LPC10 Trees and Woodland.
- LPC12 Flood Risk and Water Management.
- LPD01 Ensuring Quality Development.
- LPD02 Design and Layout of New Housing.

- LPD03 Open Space and Residential Development.



9. **Relevance to the Draft Local Plan.** At present the open spaces forming Colliers Moss Common, fall well short of their potential to meet the objectives of the Plan. Although green and open, and with significant landscape and ecological value, they are suffering from lack of investment and management, and as a result are relatively little used, neglected and suffering from anti-social behaviour.



10. **Colliers Moss Common North** (Site 69A), has a poor relationship to its surrounding areas, which are predominantly housing. The surrounding community is one of the most disadvantaged in St Helens and suffers from multiple levels of deprivation. Access to the Common is relatively unattractive. Levels of anti-social behaviour and fear of crime are both major factors in this.



11. Although there are a number of small, recent and on-going infill housing developments around the perimeter, these have little or no relationship to the Common, which remains relatively hidden and inaccessible within the local area. Other uses are referred to as inappropriate to the Green Belt in the GB Review, including scrap yards and other small-scale industries.
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14. The open space is designated as a recreational area, and has a network of footpaths and informal recreation facilities set within a maturing landscape of woodland, grassland, lakes and wetland areas. As in the South Common it suffers from lack of resources for development and management. This results in it being relatively little used, and subject to anti-social behaviour and a generally unwelcoming, insecure character for many people. The contrast with the green space around the adjacent housing, which is attractive and well used, is striking.



The site of the previous colliery complex, and the bridge over the railway linking North and South Commons.

15. It is recommended that the policies for this area are amended so as to explore carefully considered housing development in the area under consideration. This has the potential to deliver significant benefits:
- Providing a suitable location for high quality housing to meet local need; consideration could be given to special circumstances such as a care village, eco-development, mixed live/work housing. This would fit well with the concept of the garden suburb put forward for Site 74 immediately to the south, to which it would link.
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16. This proposal is not put forward simply as 'enabling' development, in which policies are set aside for an acceptable gain or compensation, but rather as an inherent good in its own right. The loss of functionality of the Green Belt in terms of restricting sprawl, maintaining openness or settlement separation is not regarded as significant, provided that the development is carefully considered and aimed at delivering the major potential wider benefits to the character and function of the Green Belt. The 'exceptional circumstances' justification is appropriate in this context. The regeneration of the power station site provides a clear demonstration of how

an integrated, enlightened approach can deliver high quality open space in association with new housing, and make a highly effective contribution to the delivery of a wide range of Plan policies.



High quality open space and informal leisure facilities created on the adjacent previous power station site.

RO0294

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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANN</u>	First name: _____
Last Name: <u>CASSIDY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>37. NEILLS ROAD</u> <u>BOLD ST HELENS</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA9 4SY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>16.4.2019</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on 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.

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**

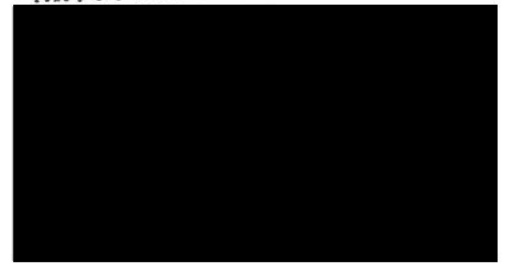
Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**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.**

RO0295

12 MAR 2019



DEAR SIR/MADAM

I AM WRITING TO EXPRESS MY OBJECTION TO THE BUILDING ON THE GREEN BELT LAND, BOUNDED BY REGINALD RD. TRAVERS ENTRY, GORSEY LANE.

[REDACTED] TO LIVE IN A SEMI RURAL LOCATION AND ENJOY THE QUIET AND OPEN SITUATION.

[REDACTED] TO MOVE THERE FOR THE SAME REASONS. IT ALSO BEING AN IDEAL PLACE TO BRING UP MY FAMILY.

THEY ALSO ENJOYED IT, WALKING THE FOOTPATHS THROUGH THE FIELDS WITH OUR DOG AND WITNESSING NATURE AT FIRST HAND.

WE HAD BIRDS NESTING IN OUR HEDGES, SQUIRRELS, RABBITS AND EVEN PHEASANTS AT TIMES IN OUR GARDEN.

FROM OUR FRONT WINDOW WE COULD SEE BURTOWN AND BEYOND TO THE PENINES. NOW THIS IS NOT SO. THE VIEW IS OBSCURED, BY TREES WHICH ABSORB CO₂ NOT HOUSES WHICH EMIT IT. FOR WHICH I AM GRATEFUL.

(2)

IF THE PLANS GO AHEAD I AM REGRETING
HAVING TO LIVE OUT MY LAST YEARS ON THE LEADING
EDGE OF URBAN SPRAWL WHICH NO DOUBT WILL EVENTUALLY
RESULT IN ONE GIANT CONURBATION STRETCHING FROM
LIVERPOOL THROUGH ST. HELENS, WIDNES AND WARRINGTON
TERMINATING IN MANCHESTER

WITH POPULATIONS WONDERING, ARE THERE ANY FIELDS
TO GROW THEIR FOOD?

YOURS SINCERELY



G. CASSELL

RO0296



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: MARK	First name:
Last Name: CASSELL	Last Name:
Organisation/company:	Organisation/company:
Address: C/O 37 NEILLS RD BOLD ST. HELENS	Address:
Postcode: WA9 4SY	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 16/4/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0297

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

985

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>IRENE</u>	First name: _____
Last Name: <u>CASSIDY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 BUSHELIS DRIVE</u> <u>CLOCK FACE</u> <u>STHELENS</u>	Address: _____
Postcode: <u>WA9 4LZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____ Date: 11/3/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy ✓		Paragraph/ diagram table		Policies Map ✓		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
I support BOD + CLOCK FACE ACTION Group.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

RO0298

Representor Details

Web Reference Number	WF0252
Type of Submission	Web submission
Full Name	Miss Caroline Cassidy
Organisation	
Address	128 Leach Lane St Helens WA9 4PH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	HS04 Land at Bell Lane
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Basically, the land was set for release (safeguarded). Now, the council have decided not to release it because there are multiple owners & they feel it is too difficult when there are plots with only one owner. That's fine, but when they safeguarded it, they knew about the situation & have done for 12 years. This decision is discriminatory in my opinion. I have worked hard to contact the owners who are all willing to sell their land. A lot of the unsold land belongs to the company who sold it to us in the first place, so it is not in their interests not to sell the land. This land has new builds right up to the perimeter of the land. A residential housing area behind it & other farm houses just past it. So, why it hasn't been released is a mystery. The problem is, a lot of the landowners are in their retirement and in another 15 years, they may not be alive. The land they own, like ours will go to charity or family members. So, when you finally run out of land and want to use it for housing, it will be an even bigger problem than it is now.

7. Please set out modification(s) you consider are necessary

Firstly, I think that the wording of this plan is so confusing, so having a say on it is difficult. Landowners have been put off filling in these forms, so my comments may not be in the right area or indeed answer your questions. This process should be made simpler than it is.

I feel there has been no help from the council for the Bell Lane site. A planning officer assured me he would write to the landowners to try & help matters when I couldn't locate a few of the owners. That didn't happen. The same officer said the council did not want to put any resources into this site since other (easier) sites were available. A new build in this area I feel would enhance the local area which has been on the decline for years. Small businesses have closed due to not having any passing trade. Houses are all around it. The council have been busy allowing playing fields that have been enjoyed & used for many years to be built upon, clogging up a very small side road with traffic, doing nothing to enhance my area in the slightest. Yet the land we own has been left an eyesore, with overgrown shrubbery & self seeded trees blocking anyone's view of the countryside. At some point you are going to need this land, as you simply cannot build in front of it before you release this parcel as you will have already set the precedent for housing. But, the longer it is left, the more trouble you will have getting anyone to sell. I have worked tirelessly over the years contacting the plot owners & we all feel very let down by the council. Safeguarding the land for housing gave us all so much hope as many of us lost our life savings on buying this land from PropertySpy. To confirm, some of the owners have given up on filling these forms in, so I hope that someone, somewhere will reconsider this plot of land and hopefully add it to the local plan. I feel we have been discriminated against.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 4:52:15 PM
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Representor Details

Web Reference Number	WF0325
Type of Submission	Web submission
Full Name	Miss Caroline Cassidy
Organisation	N/A
Address	128 Leach Lane St Helens WA9 4PH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA 06
Paragraph / diagram / table	Appendix 5,6,7
Policies Map	HS04 Land at Bell Lane
Sustainability Appraisal / Strategic Environmental Assessment	Fragmented build due to multiple ownership
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Basically, the land was set for release (safeguarded). Now, the council have decided not to release it because there are multiple owners & they feel it is too difficult when there are plots with only one owner. That's fine, but when they safeguarded it, they knew about the situation & have done for 12 years. This decision is discriminatory in my opinion. I have worked hard to contact the owners who are all willing to sell their land. A lot of the unsold land belongs to the company who sold it to us in the first place, so it is not in their interests not to sell the land. This land has new builds right up to the perimeter of the land. A residential housing area behind it & other farm houses just past it. So, why it hasn't been released is a mystery. The problem is, a lot of the landowners are in their retirement and in another 15 years, they may not be alive. The land they own, [REDACTED] go to charity or family members. So, when you finally run out of land and want to use it for housing, it will be an even bigger problem than it is now.

7. Please set out modification(s) you consider are necessary

Firstly, I think that the wording of this plan is so confusing, so having a say on it is difficult. Landowners have been put off filling in these forms, so my comments may not be in the right area or indeed answer your questions. This process should be made simpler than it is. I feel there has been no help from the council for the Bell Lane site. A planning officer assured me he would write to the landowners to try & help matters when I couldn't locate a few of the owners.

RO0299



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JANICE</u>	First name: _____
Last Name: <u>CASSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>35, ABINGER ROAD</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>WILAN</u>	_____
Postcode: <u>WN4 0RN</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>12/3/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy IHA LPAS Small Core		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Tram Congestion</p> <p>Local Infrastructure - Dental - Doctor Schemes</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete ~~LAND~~ from proposed removal or
LAD from 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.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☒ No, I do not wish to participate at the oral examination

☐ Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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.

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

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 1A and from proposed
removal of greenbelt 1C

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

~~No, I do not wish to participate
at the oral examination~~

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0300

EF0005
① - LPA06, 3HS



Re: GREEN BELT OBJECTION

jacqui cave to: planningpolicy

05/03/2019 22:11

3 attachments



objection form.docx objection form.pages objection form.pdf

Hi i have reattached form please let me know if this can be opened ok
many thanks
jacqui

On 4 Mar 2019, at 13:08, Jacqui [REDACTED] wrote:

It appears to say some called [REDACTED] deleted pages in your office - it was saved from your site onto Apple Mac and emailed I will try again tonight

Thanks

Jacqui cave

Sent from my iPhone

Begin forwarded message:

From: planningpolicy@sthelens.gov.uk

Date: 4 March 2019 at 10:14:48 GMT

To: jacqui cave [REDACTED]

Subject: Re: GREEN BELT OBJECTION

Morning Mrs Cave,

Unfortunately there seems to be a problem with the attachment you have sent over as it will not open. What format is it in? If you could re-send it again in a word format that would help - or even let us know what format it is so we can try and re-open it this end.

Yours faithfully,

The Planning Policy Team

Development Plans Section | Development & Growth Division | Place Services Department |
St.Helens Council

Postal Address: Planning Policy Team | St Helens Town Hall | Victoria Square | St Helens | WA10
1HP | Tel: 01744 676 190

Email: planningpolicy@sthelens.gov.uk | Website:

<https://www.sthelens.gov.uk/planning-building-control/planning-policy/>

jacqui cave ---02/03/2019 13:01:30---THANKS AND REGARDS JACQUI CAVE

From: jacqui cave [REDACTED]

To: planningpolicy@sthelens.gov.uk

Date: 02/03/2019 13:01

Subject: GREEN BELT OBJECTION

[attachment "GREEN BELT FORM.pages" deleted by [REDACTED]]

THANKS AND REGARDS
JACQUI CAVE

HERE IS MY ATTACHED OBJECTION TO THE GREEN BELT PLANNING IN
RAINHILL AREA

"This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed. It may contain privileged information. Any unauthorised review, use, disclosure, distribution or publication is prohibited. If you have received this e-mail in error please contact the sender by reply e-mail and destroy and delete the message and all copies from your computer. "

**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).

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: MS	Title:
First Name: JACQUELINE ANN	First name:
Last Name: CAVE	Last Name:
Organisation/company:	Organisation/company:
Address: 1RAILTON CLOSE RAINHILL	Address:
Postcode: L35 0QD	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 02/03/2019
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) YES

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Please note we are unable to accept faxed copies of this form.

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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

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/ section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> DONT KNOW	No <input type="checkbox"/> DONT KNOW
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/> X
Justified?	<input checked="" type="checkbox"/> X
Effective?	<input checked="" type="checkbox"/> X
Consistent with National Policy?	<input checked="" type="checkbox"/> X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <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	

SAFETY ISSUES TO PEDESTRIANS

TOO MANY CARS IN SMALL AREA MORE POLLUTION

LACK OF RESOURCES TO SUPPORT THE GROWTH IN HOMES

NOT ENOUGH ROADS TO SUPPORT GROWTH OF CARS IN AREA - BOTTLE NECK TRAFFIC - WE ALREADY HAVE ISSUES WHEN ONE SET OF LIGHTS IS OUT IN THE AREA MORE HOMES BRINGS MORE CARS NOT ACCEPTABLE

DAMAGE TO ENVIRONMENT IN AN AREA THAT DOESN'T NEED IT WHEN SO MANY HOMES COULD BE BUILT NEARER TO TOWN USING LESS TRANSPORT THEREFORE LESS POLLUTION TO OUR CLIMATE

HOUSES THAT ARE EXPECTED TO BE BUILT ARE ONLY FOR HIGHER EARNERS NOT PEOPLE WHO CAN AFFORD THEM -

THERE ARE PLENTY OF URBAN AREAS THAT CAN BE MAXIMISED TO BENEFIT NEW HOMES WITHOUT SPOILING THE NATURAL ENVIRONMENT

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE COUNCIL SHOULD DELETE THIS LAND FROM THE PROPOSAL THEREFORE ABIDING WITH NATIONAL PLANNING POLICY FRAMEWORK 2019

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**