



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO0601 – RO0700

SEPTEMBER 2020

RO0601

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>CHRISTOPHER</u>	First name: _____
Last Name: <u>FOY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 FRENCHFIELDS</u> <u>CRESCENT ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4FZ</u>	Postcode: _____
[Redacted]	tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	email: _____

Signature: _____	Date: <u>26.2.19</u>
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Please be aware that your comments will only be accepted and that in order for your comments to be considered you must complete this form.

Would you like to be consulted about the St 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
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RO0602

Ref: LPSD

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1116
13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: MELISSA

Last Name: FOY

Organisation/company: [REDACTED]

Address: 14 FRENCHFIELDS
CRESENT

Postcode: WA9 4FZ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: [REDACTED]

Date: 3/3/19

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)

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☐ No

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RO0603

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MCS</u>	Title: _____
First Name: <u>Joey</u>	First name: _____
Last Name: <u>Sty</u>	Last Name: _____
Organisation/company: <u>RETIRED.</u>	Organisation/company: _____
Address: <u>41 NEWS ROAD</u>	Address: _____
<u>St. Helens</u>	_____
<u>Merseyside</u>	_____
Postcode: <u>WA9 4SY</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>15.3.19</u>
------------------	----------------------

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

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☒ No

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RO0604



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)

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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: <i>Ms</i>	Title:
First Name: <i>RACHEL</i>	First name:
Last Name: <i>FREARSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>14 FOXGLOVE CLOSE, BROUGHTON,</i>	Address:
Postcode: <i>LE9 6YU</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

04/03/19

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

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Yes ☒ (Via Email)

No ☐

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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 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"/>	
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

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 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.

①

②

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.

3

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.

4

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

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

Policy LPA04.1: Strategic Employment Sites

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

5

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

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

6

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

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

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

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

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

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

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

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

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

Policy LPA05.1: Strategic Housing Sites

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

Policy LPA06: Safeguarded Land

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

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

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

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

Policy LPA07: Transport and Travel

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

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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

8. If your representation is seeking a modification; 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"/>	
--	--	--------------------------	--

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.**

RO0606



St. Helens
Council

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04 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mrs</i>	Title:
First Name: <i>Elizabeth</i>	First name:
Last Name: <i>Frodsham</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>Mill House Farm Higher Lane Rainford</i>	Address:
Postcode: <i>WAP1 8NF</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

25/2/2019

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table		Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Draft Local Plan					

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 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

Against protection of Rainford Greenbelt
Not environmental friendly
Inadequate infrastructure
Housing demand forecast flawed

Please continue on a separate sheet if necessary

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

Removal of Rainford Greenbelt land proposed
to designate for Urban Development

Please continue on a separate sheet if necessary

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

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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.

RO0607



St. Helens
Council

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

Ref: LPSD

6102 MAR 4 0

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>ROBERT FRODSHAM</i>	First name:
Last Name: <i>FRODSHAM</i>	Last Name:
Organisation/company: <i>RESIDENT</i>	Organisation/company:
Address: <i>NEW HOUSE FARM HIGHER LAKE RAINFORD</i>	Address:
Postcode: <i>WA11 6NF</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature

26/3/19

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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RETURN DETAILS

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NEXT STEPS

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DATA PROTECTION

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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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input type="checkbox"/>	Habitats Regulation Assessment	<input type="checkbox"/>
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Other documents (please name document and relevant part/section)

RAFT Local Plan AND DESIGNATION OF LAND AGRICULTURAL GREENBELT FOR RAINFOOD HOUSING DEVELOPMENT

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 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 HOUSING DEMAND FORECASTS UNRELIABLE
- 2 DESIGNATION OF RAINFOOD AGRICULTURAL LAND FOR HOUSING DEVELOPMENT IS LOSS OF GREENBELT, ASSOCIATED AGRICULTURAL EMPLOYMENT, WINDLINE HABITAT
- 3 INADEQUATE INFRASTRUCTURE TO SUPPORT DEVELOPMENT (Roads, GP's, schools) AND ASSOCIATED DANGERS

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 or work on Rainford's Greenbelt
land from development plan

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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Please keep a copy for future reference.

RO0608



St. Helens
Council

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

Ref: LPSD

04 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Helen	First name:
Last Name: Frodshaw	Last Name:
Organisation/company: Resident	Organisation/company:
Address: Mill House Farm, Higher Lane, Rainford	Address:
Postcode: WA11 8PF	Postcode:
	Tel No:
	Mobile No:
	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 ☐

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RETURN DETAILS

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Town Hall
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St.Helens
Merseyside
WA10 1HP**

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Telephone: 01744 676190

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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	<input checked="" type="checkbox"/>	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Local Plan for use of Greenbelt in Rainford for housing Development					

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 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

Housing Demand forecasts questionable.
 Against Greenbelt National Policy, for Rainford Agricultural Land
 Not effective in supporting infrastructure
 Loss of Agricultural Employment
 Destruction of wildlife habitats in use of green belt
 Loss of vital food production facilities

Please continue on a separate sheet if necessary

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

Removal of proposal to use Rainford's Green Belt
land which provides vital source Agricultural
Use and associated habitat for
Residential Housing Development

Please continue on a separate sheet if necessary

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

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RO0609

① - LPA05
② - Para 172 DTC

418

PF0382



St. Helens
Council

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

Ref: LPSD

12 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	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>ANNE</u>	Last Name:
Organisation/company: <u>FRODSHAM</u>	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

8.3.19

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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 ☐

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PART B – YOUR REPRESENTATION

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

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				All above with specific points relating to HAS (Rookery 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?	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 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 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

Regarding the overall figures in the Plan, I do not think there are any exceptional circumstances to justify not using the standard method to calculate housing need. The economic analysis is flawed and based on over optimistic assumptions this means that the level of land required is not as high as set out in the Local Plan and therefore there are no exceptional circumstances to change green belt boundaries. Other reasonable alternatives have not been explored. The council have failed to co-operate with other councils and have not published any statement of common ground. I think that the Local Plan is unsound because an additional 286 houses is a big increase in the population of Rainford putting pressure on infrastructure, schools, doctors surgeries, increased road traffic. HAS (Rookery Lane) is a flooding risk. (please see separate sheet)

Please continue on a separate sheet if necessary

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

The development of HAS (Rookery Lane) is not justified at all due to the flooding risk and that it is situated next to an industrial area

The economic development of the local plan is not diversified enough and there is too much focus on warehousing

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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Rookery Lane (HAS) currently floods and the situation would be made considerably worse if the field was turned into a housing estate and covered in concrete

Rookery Lane (HAS) is Grade 1 agricultural land and is currently farmed. If this field was not used for farming, it would have an impact on the farmers business

There hasn't been any consultation with Natural England over the loss of Grade 1 Agricultural (BmV) land

HAS 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 and 142

Only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 sites have all been discarded. St Helens Council's own assessment is that HAS is the least appropriate green belt site allocated for housing in phase 1.

RO0610

① - LPA05
② - Para 1.7.2 DTC

PA0383

419



St. Helens
Council

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

Ref: LPSD

12 MAR 2019

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: KEITH	First name:
Last Name: FRODSHAM	Last Name:
Organisation/company:	Organisation/company:
[REDACTED]	Address:
[REDACTED]	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]

Date:

8TH 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 ☐

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Other documents (please name document and relevant part/section)				ALL WITH SPECIFIC POINTS RELATING TO HAS (ROOKERY 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?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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

1. I DON'T THINK THERE ARE EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY NOT USING THE STANDARD METHOD TO CALCULATE HOUSING NEED.
 2. THE OVER OPTIMISTIC ~~ANALYSIS~~ ASSUMPTIONS IN THE ANALYSIS MEANS THAT THE LEVEL OF LAND REQUIRED IS NOT AS HIGH AS IS SET OUT IN THE LOCAL PLAN.
 3. I DON'T THINK THERE ARE EXCEPTIONAL CIRCUMSTANCES TO CHANGE GREEN BELT BOUNDARIES
 4. OTHER REASONABLE ALTERNATIVES HAVE NOT BEEN EXPLORED FULLY INCLUDING LOWER TARGET FIGURES AND USING MORE PREVIOUSLY DEVELOPED LAND
- (PLEASE SEE ADDITIONAL SHEET)

Please continue on a separate sheet if necessary

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

THE ECONOMIC DEVELOPMENT INCLUDED IN
THE LOCAL PLAN IS TOO FOCUSSED ON
WAREHOUSING AND NEEDS MORE DIVERSIFICATION
THE DEVELOPMENT OF ROOKERY LANE, HAS
IS NOT JUSTIFIED AT ALL DUE TO THE
FLOODING RISK AND THAT IT IS SITUATED
NEXT TO AN INDUSTRIAL AREA

Please continue on a separate sheet if necessary

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

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

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

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.

5. ST HELENS COUNCIL HAVE NOT PUBLISHED ANY STATEMENT OF COMMON GROUND AND CO-OPERATED WITH OTHER COUNCILS
6. 286 HOUSES PUTS PRESSURE ON INFRASTRUCTURE INCLUDING SCHOOLS, DOCTORS SURGERIES INCREASED ROAD TRAFFIC
7. ROOKERY LANE (HAS) IS A FLOODING RISK AND REGULARLY FLOODS NOW. THIS WOULD BE MUCH WORSE IF IT WERE CHANGED TO A HOUSING ESTATE
8. ROOKERY LANE (HAS) IS GRADE 1 AGRICULTURAL LAND WHICH IS CURRENTLY FARMED. THERE HASN'T BEEN ANY CONSULTATION WITH NATURAL ENGLAND OVER THE LOSS OF GRADE 1 AGRICULTURAL (BMV) LAND. IF THE FARMER COULDN'T FARM THIS LAND IT WOULD HAVE A NEGATIVE IMPACT ON THEIR BUSINESS
9. ROOKERY LANE (HAS) IS NEXT TO AN INDUSTRIAL AREA WITH THE RISKS ASSOCIATED WITH POLLUTION AND AS RECORDED RECENTLY, EXPLOSION
10. ONLY 4 SITES SCORE 4 NEGATIVES ON THE SUSTAINABILITY APPRAISAL AND THE OTHER 3 SITES HAVE BEEN DISCARDED ST HELENS COUNCIL'S OWN ASSESSMENT IS THAT HAS IS THE LEAST APPROPRIATE GREEN BELT SITE ~~ALLOCATED~~ ALLOCATED FOR HOUSING IN PHASE 1

RO0611

660070

SIR 81/1

① - L.M.A.

② - S.M.A.



local plan HA8 (Rookery Lane Rainford)
sarah frodsham
to:
planningpolicy@sthelens.gov.uk
11/03/2019 21:52

Dear Sir/ Madam

We are writing to outline our representation to the above mentioned local plan with particular focus on the site HA8, Rookery Lane, Rainford.

Our primary objections are outlined below:

- The housing need as forecasted by the council is not inline with many other figures suggested by other professional bodies and as such there are no exception circumstances that justify not using the standard method to calculate housing need. This has resulted in the figures suggested by the council being wildly over the top
- Thus the economic analysis is flawed being based on over optimistic assumptions, that buck the trend seen in local population growth for well over a decade.
- As such the amount of land needed in the local plan is not as required in reality
- Most importantly, there are absolutely no exceptional circumstances that justify using greenbelt land for development
- There has been little exploration of suitable alternatives including the use of brownfield sites and the delayed publication of a brownfield site register, suggesting the lack of commitment to alternatives from the council, even though these alternatives could provide reduced impact solutions with existing infrastructure

Specific focus on HA8

- The other sites that also scored red on the sustainability appraisal have already been discarded. HA8 scores 4 negatives and therefore the councils own assessment must be that HA8 is not suitable for development from a sustainability prospective
- This site is next to an industrial area with a high risk of health and safety concerns for those that may live in such close proximity. There have been incidents of explosions and pollution recorded in the recent past. Similar sites have been discarded for similar reasons
- The land is grade 1 agricultural land which provides employment as well as being a vital source of high quality food produce. It makes no sense that the plan is intended to promote employment and economic growth when the proposal is to destroy something already providing this
- To my knowledge there has been no consultation with natural England over the loss of this high quality agricultural land

I urge you to take note of the voice of local residents, such ourselves, who are passionate about safeguarding the future of Rainford and its agricultural heritage for future generations. The completion of the plan as currently outlined will destroy the rural character of the village, decimate vital agricultural land and put into jeopardy livelihoods of many employed within the existing agricultural sector.

Kind regards

Sarah Frodsham
Thomas Wright

11 Festival Road, Rainford, St.Helens WA11 8EP

RO0612

ELO260



St Helens Borough Local Plan Draft Submission Reps - on behalf of Star Pubs and Bars

Paul Tunstall

to:

planningpolicy@sthelens.gov.uk

13/03/2019 17:27

①-LPCOS

2 Attachments



image001.jpg image002.jpg lpsd-representation-form.doc Local Plan Representations .pdf

Dear Sirs,

Please find attached a completed form and brief Statement on behalf of the above.

Please can you acknowledge receipt?

Many thanks

Paul Tunstall MRTPI
MANAGING DIRECTOR

JWPC Limited
1B Waterview, White Cross, Lancaster, LA1 4XS



This email and the files sent with it are confidential and for the use of the intended recipient(s) only. If you are not the intended recipient(s), please note that any use, distribution or copying of this communication or the information in it, is strictly prohibited. If you have received this in error, please notify the sender by replying by email and then delete the email completely from your system. This email and any attachments have been scanned for viruses, but it is the responsibility of the recipient to conduct their own security measures and no responsibility is accepted by JWPC Ltd for loss or damage arising from the receipt or use of this email. No responsibility is accepted by JWPC Ltd for personal emails or emails unconnected with the firm's or clients' business.



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: Charlie	First name: Bryanni
Last Name: Gale	Last Name: Cartledge
Organisation/company: Star Pubs and Bars	Organisation/company: JWPC Chartered Town Planners
Address: c/o agent	Address: 1B Waterview White Cross Lancaster Postcode: LA1 4XS
Postcode:	

Signature:

Date:

12/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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	LPC05	Paragraph / diagram / table		Policies Map	Page 5	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 checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input 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 SEE SUPPORTING LETTER ATTACHED

These representations are made on behalf of Star Pubs and Bars in **SUPPORT** of the emerging New 'St.Helens Borough Local Plan 2020-2035', in particular the allocations shown on the Proposals Map for policy LPC05 Open Space.

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

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

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

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

Local Plan Representations

The New 'St.Helens Borough Local Plan 2020-2035'

The Golden Lion, Rainford

Job No: 18/L/130

Version: 1

Prepared by: Bryanni Cartledge

1. Local Plan Representations

1.1. These representations are made on behalf of our client, Star Pubs and Bars, in **SUPPORT** of the emerging New 'St.Helens Borough Local Plan 2020-2035', in particular the allocations shown on the Proposals Map for policy LPC05 Open Space.

1.2. Our client has interest in the Golden Lion Public House in Rainford. It is believed that there was previously a bowling green at the rear of the pub, although this used ceased in 1964/65 according to a former user. The St. Helens Playing Pitch Strategy Report (2016) is silent on the Golden Lion site, that is, it does not count the site as an active or disused/lapsed bowling green (or any other sports pitch).

1.3. Since the 1960's, the land has been used as an ancillary outdoor seating area for customers of the Golden Lion. The outdoor space is screened and enclosed by mature hedges which separate it from the playing fields to the rear and it is not available for use by the general public.



Figure 1: Aerial Image (Google Earth, 2018) showing the site edged in red. The site is well enclosed and has been used to house picnic benches as outdoor seating for the Golden Lion.

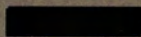
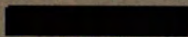
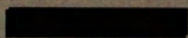
- 1.4. The site was allocated as Open Space in the St. Helens Unitary Development Plan (1998) and categorised as a Private Recreation Facility. The site was also included in the St. Helens Open Space Study (2006) in which it fell under the typology of Amenity Green Space. At the time of consultation for the UDP, the site owners were not aware of the designation. If they were, they would have objected to it on the basis that, at the time it has not been used by the public for such purposes for 30 plus years.
- 1.5. The St. Helens Open Space Assessment (2016) served to update the Open Space Study (2006). In accordance with best practice recommendations a size threshold of 0.2 hectares was applied to the inclusion of some typologies within the study, this included the Amenity Green Space typology. Some sites below the 0.2ha threshold were included if identified through consultation as being of significance.
- 1.6. The site at the Golden Lion is under 0.2ha and it was not identified through consultation as being of significance. The site was therefore excluded from the Open Space Assessment (2016).
- 1.7. In the 'St.Helens Borough Local Plan 2020-2035 Proposed Submission Draft Policies Map' the small site at the Golden Lion has been removed from the Open Space (Policy LPC05) designation. Rainford retains a large amount of Open Space, including two large recreation grounds, the cemetery, various school playing fields, Rainford Linear Park and a number of other smaller Open Space designations.
- 1.8. The Open Space designation as proposed in the New Local Plan offer areas of high value to benefit the wider community.
- 1.9. **We support the Open Space designations as per the Submission Draft of the St Helens Borough Local Plan, as set out in Policy LPC05 and as shown on the draft Proposals Map**
- 1.10. **The land at the Golden Lion, Rainford is no longer able to provide community benefits as it is used entirely as a private amenity space for the purpose of the Golden Lion operations, and has been for many years.**



Thank you.

JWPC Ltd

1B Waterview, White Cross
Lancaster, Lancashire, LA1 4XS



RO0613



Local Plan 2020-2035

Shaun Gallagher to: planningpolicy

12/03/2019 13:43

Dear Mr Clarke,

I wish to register my objections to elements of proposed release of Green belt in Haydock area. In particular the Area defined 2HA.

Traffic around Blackbrook and Haydock are almost at Saturation point, particularly during rush hour periods.

I have raised the issue with my local councillor, [REDACTED] over the last two years the problem with trying to cross the road on footn at Vicarage Rd near Vicarage Drive to get to Tesco shop, post box and bus stop on Westend Rd. my request for a refuge island was declined. it is also very difficult getting out of Vicarage Drive by car, particularly turning right towards new bypass.

To build Houses or anything else on the land marked 2HA and place a roundabout, or any other access at the junction of Vicarage Road and Liverpool Rd, would greatly exacerbate an already horrendous traffic situation on Vicarage Rd and Haydock area in general. As well as make even more difficult to cross the road near Tesco express, it would make it almost impossible to turn right out of Vicarage Drive by car. It would force traffic to turn left and use Westend Rd rather than the Bypass. Therefore undermining the purpose of the Blackbrook bypass in the first place.

Yours Sincerely
Shaun Gallagher
43 Clipsley Crescent
Haydock
St.Helens
WA11 0UH

Sent from my iPad

RO0614



St. Helens
Council

672

**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: LESLEY	First name:
Last Name: GOUNIE	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 2 FAIRLIE DRIVE RAINHILL MERSEYSIDE	Address:
Postcode: L35 0PW	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

11th March 2019

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


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

Yes ☒ (Via Email)

No ☐

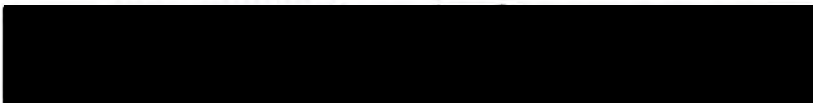
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

1. NAME MR F, J HEYES PRINT NAME HEYES
ADDRESS 4, FAIRLIE DRIVE, RAINHILL
PRESCOT M/SIDE L35 0PW DATE 12/3/19.



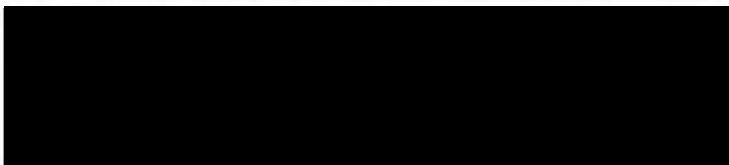
I give explicit permission for my name to be used in this response.

2. NAME L. J. Gannon PRINT NAME L. J. GANNON
ADDRESS 7 BIRNAM DRIVE, RAINHILL
PRESCOT M/SIDE L35 0PR DATE 17.03.19.



I give explicit permission for my name to be used in this response.

3. NAME JOSEPHINE PRINT NAME J. KELLY
ADDRESS 612 WARRINGTON RD RAINHILL
MERSEYSIDE L35 0NS DATE 12.3.19

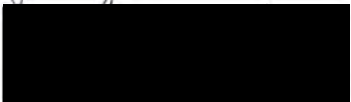


I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME
ADDRESS
..... DATE
SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together.



**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:

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

Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

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

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

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	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

Our primary concern is the inevitability of an increase in the volume of traffic along Warrington Road (A57). We currently see & experience first hand traffic congestion on a daily basis. In our opinion any additional traffic is going to exacerbate this existing problem.

We believe that the developments under the Liverpool City Plan, including Scotchbarn Lane & the new Halshead Garden Village, will imminently be adding to this growing problem as they are also serviced by the A57.

The A57 is a direct route to & from Whiston hospital, ambulances & other emergency vehicles frequently have to navigate through very heavy traffic.

We are also aware that the Warrington Road/Rainhill Road & Portico Lane/Prescot Road junctions are confirmed, with Council figures, at capacity.

We live on the Briscoe estate, off Warrington Road, & have already noticed how at certain times of the day - especially at the start & end of school, & there are 5 in the vicinity - traffic creates a problem on the minor roads.

We are fearful that the negative impact of increased traffic will be felt in the numerous smaller estates & minor B & C roads off Warrington Road, which could then become dangerous short cuts.

It is also in our opinion that increased traffic will affect air pollution & pedestrian safety.

Between 2013-2015 St Helens had a higher than average death rate from respiratory diseases in the under 75s - 51.9 deaths per 100,000 compared to 44.3 in the North West & 33.1 in the rest of England.

As Rainhill residents we already experience delays in getting to see a GP. We are worried that additional housing will result in even longer waiting times for appointments at hospitals, doctors & dentists, or else the use of cars will be necessary to access surgeries & hospital facilities & also school places out of the immediate vicinity.

With the St Helens Council register for brownfield sites suggesting the availability for 5808 houses we question why the release of green belt land is necessary.

If the parcel of 3HS is removed from green belt & eventually developed it would create a continuous area of urban dwellings.

We are also extremely concerned that more than 13 **protected** species of flora & fauna can be found on the area of 3HS land.

Finally we strongly believe that the release of this parcel of green belt land defeats the whole essential purpose of green belt land in our communities.

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 proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

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		
--	--	--

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.**

RO0615



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.

1400
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: Ryan	First name:
Last Name: Gardam	Last Name:
Organisation/company: Tinsalls Farm	Organisation/company:
Address: Clock Face	Address:
Postcode: St. Helens	Postcode:
WA9 4QT	
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature: [Redacted]	Date: []

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on 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

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Please continue on a separate sheet if necessary

RO0616



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

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

13 MAY 2019
11:02

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANDREA	First name:
Last Name: GARDAM	Last Name:
Organisation/company: Tunstalls Farm	Organisation/company:
Address: Clock Face St. Helens	Address:
Postcode: WA9 4QT	Postcode:
Tel No: 01256 754111	Tel No:
Mobile No: [REDACTED]	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.

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental 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 type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

Please continue on a separate sheet if necessary

RO0617



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.

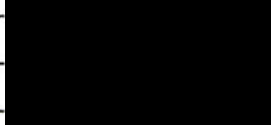
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1425
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: STANLEY	First name:
Last Name: GARDNER	Last Name:
Organisation/company:	Organisation/company:
Address: 524 GARSWOOD RD	Address:
Postcode: WN4 0X1-1	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 11/5/2019
--	-----------------

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

Would you like to be kept updated of future stages of the St 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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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 PA05		Paragraph / diagram / table		Policies Map	14A	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 checked="" type="checkbox"/>	No
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 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

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

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

. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

411

20492

Please continue on a separate sheet if necessary

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

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

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	
LP A06					1 HS				
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 checked="" 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 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	

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causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

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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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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.**

RO0618

① - GEN ② - GEN

Representor Details

Web Reference Number	WF0193
Type of Submission	Web submission
Full Name	MR JOHN GARNER
Organisation	
Address	60A VISTA ROAD NEWTON LE WILLOWS M;SIDE WA12 9ER
Agent Details	

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

Yes (via e-mail)

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

Policy	EQUAL OPPORTUNITIES LIMITATIONS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	INADEQUATE ROAD NETWORK & POLLUTION
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified

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

A) LIMITED EMPLOYMENT OPPORTUNITIES FOR WOMEN...LOGISTICS LESS THAN 25% FEMALE EMPLOYEES

B) PLANNING GRANTED TO SITES IN ADVANCE OF INSPECTORATE CONSIDERATION E G P/2016/0608

C) EXISTING LOCAL PLAN ACCEPTED BY INSPECTORATE IGNORED (TO 2027) SO WHY BOTHER HAVING ANY PLAN RELATIVE TO REPRESENTATIONS AS SHMBC CAN SIMPLY OVERRIDE IT AT THEIR WHIM.

D) DESPITE IT BEING A HAVEN FOR RARE WILDLIFE AND CONTAINING ENGLISH CIVIL WAR LISTED BUILDINGS AND BATTLEFIELD THE OPPORTUNITY EXISTED FOR A UNIQUE COUNTRY/HERITAGE PARK FOR LOCALS AND VISITORS ALIKE. ASTONISHINGLY SHMBC BOUGHT THE LAND NOT FOR THE COMMON GOOD BUT A DEVELOPER USING PUBLIC MONIES (TOTAL LIABILITY SOME £ 6 MILLION) REPAYABLE WHEN THEY ARE FINANCIALLY ABLE TO DO SO. THUS A STATE OF "PREDETERMINATION" EXISTS CONTRARY TO PLANNING PROTOCOL.

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

HIGHWAYS ENGLAND HAVE STATED THE LOCAL INFRA STRUCTURE CANNOT PRESENTLY SUPPORT INTENDED LOGISTIC DEVELOPMENT MORE SO AS THE INTENDED ADDED JUNCTION M6 NO 22 RELIES ON LOCAL B ROADS. IT CONFLICTS WITH EX WARRINGTON TRAFFIC TO THE A580, ALREADY A

SOURCE OF SUBSTANTIAL CONGESTION. IT ALSO INVOLVES TRAVERSING THE M6 BY A BRIDGE IN NEED OF COSTLY REPAIR . THIS BRIDGE CANNOT COPE WITH TWO HGVS AT ONE TIME. THIS WILL ENCOURAGE USE OF THE A49 BOTH NORTH AND SOUTH ADDING TO THE HIGH LEVELS OF AIR POLLUTION EXISTENT IN THE NEWTON AREA, APART FROM TOWN CENTRE IMPACT. THE ESTIMATED COST OF THIS ROAD IS £ 30 MILLION PLUS LAND COST. (UNDEFINED)

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

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

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

Response Date	3/12/2019 9:42:22 AM
---------------	----------------------

RO0619

Sites 8EA + 7EA

① LPA04
② LPA10

Representor Details

Web Reference Number	WF0205
Type of Submission	Web submission
Full Name	Miss Stephanie Garner
Organisation	
Address	60A Vista Road Newton le Willows Merseyside WA12 9ER
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	EA8 Parkside East and EA9 Parkside West
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Parkside West contains important local wildlife sites and priority woodland providing habitat for locally rare, red listed and nationally protected species. The loss of this habitat cannot be mitigated as the extensive meadows have taken decades to mature and are unique within the local area. Wildlife corridors will be lost. The SSSI Highfield Moss is located adjacent to the site and is highly sensitive to increases in nitrogen dioxides and changes in ground water levels. Development and associated exhaust pollution threatens the viability of the SSSI.

The former colliery footprint only occupies about a fifth of the Parkside West site. The extent of proposed development is excessive and will destroy and industrialise the rural character of a valuable area of currently protected Green Belt land which prevents urban sprawl on the boundary of St Helens and Warrington boroughs.

The reliance on the logistics industry is economically flawed, particularly one so dependant on consumer demand. The Council have not learned the lesson of the coal industry locally and its demise and the effect on unemployment. Warehousing is increasingly automated so supposed job predictions are also flawed.

Local infrastructure is insufficient to accommodate the additional burden of thousands of vehicles each day and without weight restrictions on the A49 there is nothing to prevent HGVs from using

① + ②

②

① + ②

residential roads within Newton Le Willows to access the site, and increasing current congestion and air pollution.

The M6 adjacent to the site and A49 through High Street are Air Quality Management Areas due to breaches in pollution levels caused by vehicle exhaust emissions. The greatest contribution to nitrogen dioxide pollutants have been shown to be from HGVs and buses. SHMBC has a legal duty to work towards reducing these levels to safe limits. A road based logistic development and increased commuter traffic along this route is not compatible with the legal duty to reduce pollution on this route.

① + ②

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

Development at Parkside West should be restricted to the footprint of the former colliery only. The region is already flooded with warehouse jobs and the local rate of logistics employment is much higher than the national average. To improve social mobility and educational aspiration, the site would be better developed into a technology and science park similar to the Langtree development at Daresbury in Warrington.

Parkside West is effectively a ready made country park. The area is semi rural in character and would serve all the surrounding local communities if a much needed accessible green space was located here. As stated in the NPPF the Green Belt surrounding the former colliery should be maintained and enhanced for recreational use. It could easily be converted into a wildlife reserve in conjunction with exploiting the tourist potential of the unique history, heritage and battlefield location.

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

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

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

Response Date	3/11/2019 9:01:53 PM
---------------	----------------------

RO0620

Representor Details

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

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 consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

01

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

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- 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. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date

3/5/2019 6:20:22 PM

RO0621

Representor Details

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

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 consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

01

02

03

04

05

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

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- 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. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date

3/5/2019 6:18:13 PM

RO0622



Ref LPSD
dot garnett
to:
planningpolicy
13/03/2019 13:00



1 Attachment



new doc 2019-03-13 12.47.51-20190313125714 pm.pdf

St Helens Council

Please find attached Representation form to oppose planning on Rainhill greenbelt.

Dorothy Garnett
14 Gardeners Way
Rainhill
L35 4PU



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: DOROTHY GARNETT	First name:
Last Name: GARNETT	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 14 GARDENERS WAY RAINHILL	Address:
Postcode: L35 4PU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 13/03/19.
-----------------------	-----------------

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 <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

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

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

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

planningpolicy@sthelens.gov.uk

FURTHER INFORMATION

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

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.

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	LP A06	Paragraph / diagram / table	3HS	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"/> Don't Know	No <input type="checkbox"/> Don't Know
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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>Evidence for below is from personal experience of living here.</p> <p>We live in Gardeners Way, we have to emerge onto Rainhill Road several times a day. The traffic is <u>so</u> busy and not only rush hours morning and early evening. It is necessary to edge right into the road before it is possible to see (parking on double-yellow lines close to our road makes this worse).</p> <p>- the increase in traffic if these homes are built will make it impossible to turn onto Rainhill Road, especially a right-turn, therefore increasing the likelihood of accidents, potentially serious. The road cannot cope with any more traffic that these plans would cause. (Already accidents occur)</p> <p>- I walk along Rainhill Road [REDACTED] and otherwise, trying to cross-over is nearly impossible at times. The pavements are so narrow in places, I am always fearful of being knocked by a</p> <p>Please continue on a separate sheet if necessary</p>	

SECRET

Continued from previous page - Part B - Your representation.

... bus or larger vehicle. This again would decrease the safety of road users, mainly pedestrians on Rainhill Road.


Pollution from vehicles is bad enough now so presents an increasing level of fumes to damage health. There are scientific links that prove vehicle fumes cause cancer, lung problems and other serious health conditions.

My representation is based on my/our own experience of living here and the problems of road traffic at the moment, which would increase several-fold if this planning application is passed and homes built.

In summary the additional traffic the additional homes would generate would be substantial and therefore make the area a poorer and less healthy place to live.

The greenbelt once gone, will never be back. This would be so sad for the people that live here, the environment and wildlife.

Dorothy Barnett
14 Gardeners Way
Rainhill
L35 4PU


13/03/19

The council should remove plans to build on our green belt to stay in keeping with National Planning Policy Framework.

The council should safeguard our greenbelt for the good of the area, people who live here and our pressured environment.

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

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

Yes, I wish to participate at the oral examination

this to be necessary.

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

Scanned with CamScanner

RO0623

Representor Details

Web Reference Number	WF0059
Type of Submission	Web submission
Full Name	Mrs Zoe Garnett
Organisation	
Address	23 The Pastures Bold St Helens Merseyside WA9 4ZA
Agent Details	

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

No

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

Policy	Yes
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Effective

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

My view is in line with and the same as that of the Bold and Clock Face Action group.

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

My view is in line with and the same as that of the Bold and Clock Face Action group

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

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

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

Response Date	3/13/2019 2:35:27 PM
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RO0624



**FIRE & RESCUE
SERVICE**

15 FEB 2019

~~PL0051~~ PL0051

① - LPD02

② - LPC12

③ - LPA05

Mr Mike Palin
Chief Executive
St Helens Council
Town Hall
Corporation Street
St Helens
Merseyside WA10 1HP

Phil Garrigan
Chief Fire Officer
Merseyside Fire & Rescue Service
Fire & Rescue Service Headquarters
Bridle Road
Bootle
Merseyside
L30 4YD

Your ref:

Our ref: PG/CFO/SW

Date: 15th February 2019

Dear Mr Palin

Response to St Helens Local Plan 2020-2035 consultation

Having read the Council's Local Plan 2020-2025, I note that you state that by 2035, "St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest."

The Fire and Rescue Service supports that aspiration, but I would like to raise a few points for your consideration relating to ensuring that we work together to help keep residents and visitors safe from fire now and in the future.

In relation to the following:

1. Strategic Aims 2 – Ensuring Quality Development and 5 - Ensuring a Strong and Sustainable Economy
2. Development Principles 4 - Contribute to inclusive communities, 5 - Contribute to a high quality built and natural environment and 7- Promote healthy communities
3. Policies LPA11: Health and Wellbeing, LPC01: Housing Mix, LPC03: Gypsies, Travellers and Travelling Show People, LPD02: Design and Layout of New Housing

I would like to request that the Council continues to work closely with the Fire and Rescue Authority to ensure that fire safety is considered as a priority as domestic and commercial property development applications progress through the life of the plan. For example, the Council using its influence to encourage developers to adopt the highest levels of fire safety within their buildings rather than simple compliance with legislation would be particularly useful to improve the safety of people in St Helens in the long term although we recognise that this is not something that can be specified within the Local Plan.

In relation to Policy LPC12: Flood Risk and Water Management – it is encouraging to see that the policy seeks to ensure that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk.

As you may already be aware, we have a ten minute response standard for life risk calls that we aim to meet on at least 90% of occasions. Some of the areas identified for future development will fall outside the area that our fire appliances can usually reach within ten minutes which is unfortunately the case for some existing areas given the rural nature of the Borough. Our plan to replace the fire stations at Eccleston and Parr Stocks Road with a single new station at Watson Street is progressing and this will improve average attendance times in St Helens, but some of the areas where you propose new development may still fall outside our ten minute attendance. ③

We work to address this type of issue by providing increased levels of community safety intervention in these areas to prevent emergencies occurring, and will continue to do so, but it is important that developers are encouraged to adopt high levels of engineered fire safety solutions e.g. sprinkler systems, particularly in the light on ongoing budget cuts to the fire and rescue service. ③

It is of course, always our priority to work with you and other partner organisations to keep your communities as safe as possible and if you would like to discuss any of the matters I have raised please do not hesitate to contact me. ✓



Phil Garrigan
Chief Fire Officer

RO0625



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).

1070
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: Dr.	Title:
First Name: JAMIE ALEXANDER	First name:
Last Name: GARRY	Last Name:
Organisation/company: NHS.	Organisation/company:
Address: 123 South Perry Quay Liverpool.	Address:
Postcode: L3 4EW	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

28/3/19

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

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

Yes ☐ (Via Email)

No ☒

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

RO0626



St Helens - Submission Draft

Jones, Robin@Manchester

to:

planningpolicy@sthelens.gov.uk

12/03/2019 07:43

Cc:

"Jones, Robin"



- ELO073
- ① - LPC12
 - ② - GEN
 - ③ - LPD02
 - ④ - LPA04-1
 - ⑤ - LPA05-1
 - ⑥ - LPD05
 - ⑦ - LPC12
 - ⑧ - LPD01

1 Attachment



St Helens Submission Version 12032019 (Master).pdf

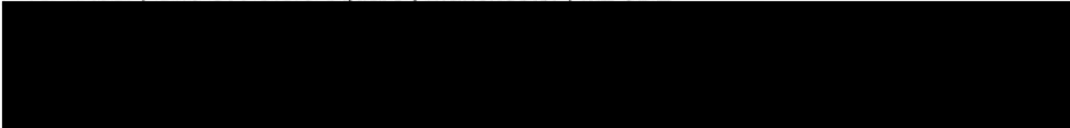
Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,
Robin

Robin Jones MRTPI | Planner
Planning and Development
CBRE Ltd
10th Floor | One St Peters Square | Manchester | M2 3DE



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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Date 12th March 2019

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

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

delays to delivery. We are keen to reemphasise the message that it is essential for early and continued detailed discussions take place over the revised allocations, in a bid to negotiate and agree any measures required to support the delivery of the proposed allocations within the revised draft. We strongly advise that contact is established at the earliest stage, ideally before any land transactions, and certainly prior to any application to explore options early as possible.

As more information becomes available on development proposals such as the approach to surface water drainage and the timing for the delivery of development, which is often only available at the planning application stage, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. We therefore request the Local Planning Authority encourages any future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. Future discussions must consider wider proposals, such as proposed transport schemes/improvements, to support new development. There is opportunity to co-ordinate the delivery of proposed highway schemes with any new infrastructure United Utilities may require to facilitate wider development in the borough.

There are a number of significant strategic allocations within the Local Plan and it is of the utmost importance that there is infrastructure delivered to sustainably serve these areas beyond the plan period. There is genuine opportunity to leave a positive legacy from new development by ensuring there is infrastructure that will serve not only the allocation but potentially make improvements for the wider area. The reason this is mentioned is that it at times goes beyond the planning system, requiring communication with highway departments or other stakeholders. We wish to work collaboratively alongside stakeholders to ensure the sustainable delivery of new development across the borough.

We wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting:

Developer Services - Wastewater



Developer Services – Water



Specific Policies

Draft Policy LPC12: Flood Risk and Water Management

UU welcomes the approach taken within Policy LPC12 and specifically clauses 8 – 12 which address sustainable drainage. We do however suggest the following minor amendments to clause 10, please note that your wording is in red, and our suggestions are in blue:

①

'Discharge of surface water to a public combined sewer will not be permitted unless clear evidence has been submitted demonstrating why no suitable alternative option(s) exist. Development proposals should identify how any necessary surface water drainage infrastructure will be appropriately maintained. The drainage proposals on all sites should be designed to address the drainage needs of the whole site. Where development would proceed in different phases or with multiple developers involved, the drainage proposals should cover all phases and the full construction period. Any development proposal should demonstrate unfettered rights to discharge between various phases.'

①

With respect to the detailed design of new development sites, we would like to highlight the importance of careful consideration of site drainage in comparison with proposed finished floor levels. We recommend policies on the design of new make reference to the need for applicants to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer. This helps ensure new development is more resilient to the impacts of climate change and the potential for flooding from sewers. A possible policy is set out below.

②

'Applicants will be expected to carefully consider the finished floor levels in comparison with the proposed drainage schemes on new development sites. It is good practice to check that the finished floor levels are higher than manhole cover levels on the receiving sewer.'

Draft Policy LPD02: Design and Layout of New Housing

We suggest emerging Policy LPD02 includes an additional clause to ensure water efficiency measures are fully considered in the design of new development. Below is an example of wording that we would recommend including within this policy:

'New residential developments will be required to:

'11. to demonstrate the site is drained in the most sustainable way, making use of topography, landscaping and ground conditions should encourage water efficiency measures including water saving and recycling measures to minimise water usage. A developer may be required to accommodate an element of open space for the discharge of surface water through the incorporation of sustainable drainage systems.'

③

'12. Demonstrate the new development has considered incorporating water efficiency measures as part of the design.'

United Utilities seeks to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

Draft Policy LPA04. 1 and LPA05.1 Strategic Sites

UU supports Policy LPA104.1 (Strategic Employment Sites) and Policy LPA105.1 (Strategic Housing Sites) which requires the submission of a comprehensive masterplan which addresses the need, at clause f, to include measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12.

Notwithstanding this, United Utilities seeks to emphasise the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.

United Utilities highlights concerns regarding those large sites which are in multiple ownership. These can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries. In practice where sites are in multiple ownership, the achievement of sustainable development can potentially be compromised by developers / applicants working independently. We therefore encourage the council to make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework. It should be demonstrated that there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from the allocated sites in the most sustainable and co-ordinated manner.

When considering the above, it should be noted some of the allocated Strategic Sites contain little existing infrastructure. Therefore any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery. Some of the allocations are adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewage infrastructure networks which are of a small diameter and can have limited capacity to support future growth. Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support growth. This reemphasises the need for a co-ordinated approach to development, especially those that are over a number of phases.

We would recommend the following amendment to the policy below, that is part of both LPA04. 1 and LPA05.1:

a comprehensive infrastructure phasing strategy for the provision of all new, expanded and / or enhanced infrastructure for delivery over numerous phases and ~~that~~ is required to serve the development of the whole site; and

Draft Policy LPD05: Extension, Alteration if Replacement Buildings in the Green Belt

United Utilities wishes to highlight that it owns assets which are currently situated in the Green Belt. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future

4

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6

environmental drivers. United Utilities requests support for any consequential investment which will be necessary as a result of the growth identified by this draft plan and by any associated development plans. It is therefore requested that local policy is worded to recognise that utility sites, located within the green belt, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.

United Utilities requests the Council's support for future investment in infrastructure in order to be able to expediently respond to the needs of St Helens. With regards to those sites situated in the Green Belt, national policy within the NPPF allows for:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
- limited infilling or the partial or complete redevelopment of previously-developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.

On this basis, we are of the opinion that National Policy is broadly supportive of the expansion of our key operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies, and reflected on your proposals map. We recommend a policy based on the following wording.

'Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.'

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of future development can be achieved. OS location plans of our sites for this purpose have been sent as part of previous consultations. The sites are listed below

Public Water Supply

Groundwater Source Protection Zones (SPZ)

UU acknowledge the reference to groundwater protection within Policy LPD01: Ensuring Quality Development and LPC12: Flood Risk and Water Management. However, owing to the presence of large areas of groundwater protection zones within the borough, UU consider that the Council should give further consideration to SPZs. To address this, UU's preference would be to have a standalone Ground Water Protection Policy in the Local Plan. This is also an important policy consideration in relation to any windfall sites that may take place in SPZ 1 or 2, as it may be necessary for the applicant to submit evidence of a risk assessment and mitigation as part of their application.

As has been raised in previous consultations, the SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The prevention of pollution to drinking water supplies is critical.

With respect to the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from locations which are identified as sensitive Groundwater protection areas especially Groundwater Source Protection Zone 1 (SPZ1). This is of particular relevance given the presence of SPZ's in the Authority area.

Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

UU understand that the two previously allocated sites located within SPZ1 (listed below), are now identified as safeguarded land.

- Former Eccleston Park Golf Club; and
- Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows

United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. Therefore, UU's preference would be for the boundaries of the allocations to be amended to remove any land identified for development within SPZ1.

7

Additionally, it is worth highlighting that there are a number of sites (listed below) located within SPZ 2:

- Land between Vista Road and Belvedere Road, Earlestown
- Former Eccleston Park Golf Club
- Land East of Newlands Grange (former Vulcan works) and west of West Coast mainline, Newton
- Land west of Winwick Road and south and east of Wayfarers Drive, Newton-le-Willows
- Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line
- Land to the east of M6 Junction 23, Haydock
- Parkside West, Newton-le-Willows

Below is UU's Policy wording suggestion in relation to Ground Water Protection Policy in the Local Plan:

'Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'The Environment Agency's approach to groundwater protection', or any subsequent iteration of the guidance.

New development within Groundwater Source Protection Zones will be expected to conform to the following:

MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.

RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

⑦

CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

Within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided.'

Health and Wellbeing

In regards to health, well-being and maximising the quality of residential amenity, UU wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour. In this regard, UU supports clause of Policy LPD01: Ensuring Quality Development. Furthermore, UU are pleased to see that the sites identified within the Draft Submission are located away from our wastewater treatment works.

We feel it is important to re-emphasise that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure. A wastewater treatment works can result in emissions which include odour and noise. Therefore, if you are considering any sites for new allocations, especially housing allocations, near to wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing such sites with potential alternative sites that may be available to you for allocation. The position of United Utilities is that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works.

⑧

Our wastewater treatment works in your borough include:

- St Helens WwTW
- Prescott WwTW
- Billinge WwTW
- Billinge South WwTW

Note that Lingley Mere WwTW is located within Warrington's authority boundary, but directly bounds St Helens.

Summary

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with St Helens Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery target.

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me.

Yours faithfully

Gemma Gaskel
Developer Services & Metering
United Utilities Water Limited

RO0627

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

Ref: LPSD

28 FEB 2019

(For official use only)

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

Please ensure the form is returned to us **by no later than 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>STEPHEN</u>	First name: _____
Last Name: <u>GASKELL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>504, GARSWOOD ROAD,</u> <u>ASHTON IN MAKERFIELD, NR WIGAN,</u>	Address: _____
Postcode: <u>WN4 0AH</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>22/2/19</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.

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

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

- 1) For the last 25 years there has been both hupwings and sky larks nesting on HAZ. Both species are on the RSPB red list.
- 2) HAZ has old mine workings beneath the surface that are undefined on any plans!
- 3) HAZ has no suitable access to this size of traffic volume going into it. The infrastructure of the area cannot cope with the increase in domestic dwellings (retros, schools, shops, etc).
- 4) This is obviously a commercial enterprise and will not; -
 - i) Provide affordable housing so badly needed for poorer diets.
 - ii) Compensate existing residence for the substantial devaluation of their properties due to this commercial development.

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.

Do not build on Greenbelt land! we are a small island that should cherish its Greenbelt land that remains.

We spend millions trying to educate third world countries to look after their wildlife, but continue to destroy our wildlife's habitat.

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:

I have always been against NIMBY mentality, but do have strong feelings for the natural environment and commercial enterprises making a lot of money, without taking into consideration the premium paid by existing residents because of the rural environment in which their properties exist.

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.

RO0628



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)

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Title: <i>MR</i>	Title:
First Name: <i>JOHN</i>	First name:
Last Name: <i>GASKELL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2A ROCKOLY LANE</i>	Address:
Postcode: <i>WALL 8ER</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/02/19

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

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Yes ☒ (Via Email)

No ☐

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

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WA10 1HP**

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

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

3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

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

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

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 to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

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

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

Policy LPA02: Spatial Strategy

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

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

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

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

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

Policy LPA03: Development Principles

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

Policy LPA04 Strategic Employment Sites

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

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

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

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

Policy LPA04.1: Strategic Employment Sites

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

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

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

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

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

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

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

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

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

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

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

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

Policy LPA05.1: Strategic Housing Sites

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

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.

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.

Policy LPA07: Transport and Travel

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.

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

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

1

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

RO0629

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;

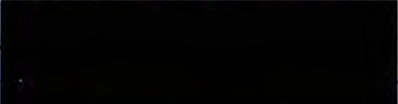
Part A - Personal Details

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>TERENCE</u>	First name: _____
Last Name: <u>GAUCKWIN</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>62 MILLBROOK LANE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 4QY</u>	Postcode: _____
Tel No: <u>/</u>	Tel No: _____
Mobile No: <u>/</u>	Mobile No: _____
Email: <u>/</u>	Email: _____

Signature: 	Date: <u>10.3.19</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

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

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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>SEE ENCLOSED SHEET NO 122.</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

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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:

TO BE MORE INFORMED.

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.

SHEET
No 1.

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

SHEET Nº 2.

SHEET Nº 1 IS AN EXTRACT FROM
THE SPRING EDITION OF 'ECRA' TIMES
2019.

IT ECHOES ALL OF THE MISSGIVINGS
I HAD OF THE 2016 FIASCO.

IT ALSO MAKES CLEAR THE IMPLICATIONS
OF WHAT 'SAFEGUARDED' MEANS, IN
PARTICULAR WITH REGARDS THE LAND
BETWEEN HOUGHTONS LANE AND THE
A580.

SHOULD THIS BE DEVELOPED IN THE
FUTURE ITS IMPACT ON THE LOCAL
COMMUNITIES OF ECCLESTON AND
WINDIE WILL DEVASTATING, AND AN
ACT OF MUNICIPAL VANDALISM.

RO0630

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

24 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.

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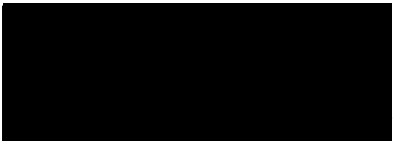
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: _____	Title: _____
First Name: <u>JOAN</u> BAKE	First name: _____
Last Name: <u>BAKE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>518 Garwood RD</u>	Address: _____
Postcode: <u>WM4 0XH</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>9.4.19</u>
--	---------------------

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

☒ Yes (via email)

☐ No

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

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setting out your representation/comment.**

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

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	1HA	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 checked="" 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 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

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

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

here were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

411

20492

Please continue on a separate sheet if necessary

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

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

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	
LP A06					IHS				
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 checked="" 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 unsound, is it because it is not:

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

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

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For the last 100 years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

241

20A 2.1



Please continue on a separate sheet if necessary

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

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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="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

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

RO0631



St. Helens
Council

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

Ref: LPSD

30 APR 2019

(For official use only)

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

Please ensure the form is returned to us **by no later than 5pm on 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.

893

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: KIM

Last Name: GEE

Organisation/company: _____

Address: 42 TENNYSON STREET

SUTTON MANOR, ST. HELENS

MARSHSIDE

Postcode: WA9 4BH

Tel No: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 19/4/19

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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

Telephone: **01744 676190**

NEXT STEPS

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

**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.**

RO0632

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.

894

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>ANDREW</u>	First name: _____
Last Name: <u>GEE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 TENNYSON STREET</u> <u>SUTTON MANOR, ST HELENS.</u>	Address: _____
Postcode: _____	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>19/4/19</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.

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

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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.**

RO0633

Representor Details

Web Reference Number	WF0241
Type of Submission	Web submission
Full Name	Miss Anna Geier
Organisation	On behalf of Rainhill Civic Society (Registered Charity)
Address	Flat 4 Victoria Court, 571 Warrington Road, Rainhill L35 4LS
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	LPA02, 05, 06
Paragraph / diagram / table	Tables 4.5, 4.6
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Appendix 7

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.

Rainhill Civic Society Response to St Helens Borough Local Plan 2020-2035 Submission Draft
Rainhill Civic Society is a local amenity society founded over 50 years ago in Rainhill. One of its aims is the preservation and enhancement of the township of Rainhill. The society has approximately 300 members and works with the local community, the Parish Council and other groups to make Rainhill an enjoyable place to live. This response has been collated by the Society's Planning Sub-committee and has been approved and minuted by the full Committee of the Society.

① Policy LPA02

The Society objects to the releasing of land from the Green Belt after 2035, also known as 'safeguarding'. The Society agrees that any form of new development on Green Belt land is inappropriate and should only be considered in exceptional circumstances, in accordance with Section 13: Protecting Green Belt Land of the National Planning Policy Framework (NPPF, 2019). The 3HS site lies within Flood Zone 2 and Flood Zone 3 and the removal of this green space is likely to increase the risk of flooding in the area due to existing surface water drainage issues and flooding from the brook. The 'safeguarding' of 3HS and potential future development will have adverse impacts on biodiversity. The 3HS site is home to several species of flora and fauna, including up to 13 protected species, which are likely to be threatened by future development.

② Policy LPA05 & Appendix 7 — ③

The Society objects to Policy LPA05 and Appendix 7, which outline the Council's aim for 486 dwellings per annum across the Borough and 956 units for the safeguarded 3HS site. Housing

requirements outlined in Table 4.5 and Table 4.6 lack consistency. Table 4.6 illustrates a requirement for 7,245 houses which equates to an additional 1,437 houses and approximately 57 hectares of land as opposed to the 288 hectares as outlined in Table 4.5. Furthermore, the Local Plan does not acknowledge the availability of brownfield land to accommodate for 5,808 houses, as outlined on St Helens Council brownfield register. There has been a decline in the Borough's local population since 1981, and so the need for additional housing in the area is unjustified. The decline of industries in St Helens since the mid-1980s suggests that income-based salaries to purchase property come from outside of 3HS and the Borough.

New housing development has the potential to further increase the strain on local resources such as schools, hospitals, doctors and dental surgeries which are currently struggling with demand. With the assumption of two cars per household, housing development will have detrimental impacts on public health due to increased air pollution from personal and commercial road vehicles. As outlined in section 8.27, air pollution in St Helens Borough is higher than the national average with high numbers of cardiovascular and respiratory disease in adults and children. Between 2013-2015, approximately 51.9 deaths per 1,000 occurred in St. Helens from respiratory diseases under the age of 75, compared with the national average of 33.1. To the east of 3HS, Thatto Heath is the second highest area affected in St Helens. These numbers are likely to increase as a result of new development.

The introduction of increased road traffic will add further strain and congestion on local communication routes such as Warrington Road (A57), the only A-road through Rainhill, Rainhill Road (B5413) including Skew Bridge, Portico Lane (B5201) / Prescott Road junction which are currently at capacity according to St Helens Council. Increased traffic will also impact small resident estates and minor B and C roads including Two Butt Lane, Kendal Drive Estate (Rainhill), Royal Oak Estate (Whiston), Mill Lane, View Road, Stoney Lane, Blundells Lane, Longton Lane and Holt Lane. As a statutory body, Sports England objected to the Stage 1 Local Plan due to the change of use of Eccleston Park Golf Club (3HS). The Council has an obligation to address such objections from statutory bodies either as being resolved or upheld. St Helens Council should provide compelling evidence for over subscription of the golf creational facilities in the local area which is still awaited.

4 Policy LPA06

NPPF outlines the importance of Green Belt and its protection to prevent urban sprawl and the merging of neighbouring towns (NPPF, 134). The Society acknowledges the importance of all Green Belt sites, including Eccleston Park Golf Club (3HS) and therefore objects to its 'safeguarding' for the future. The potential for re-development at 3HS after 2035 will remove the only Green Belt / Open Green space remaining between the areas of Rainhill, Eccleston Park, Whiston, Nut Grove and Thatto Heath. The loss of 3HS will ultimately have adverse environmental, social and economic impacts on Rainhill, the wider borough and its residents. In the case of the Local Plan, no Statement of Common Ground (SoCG) has been issued with neighbouring authorities.
Planning Sub-committee on behalf of Rainhill Civic Society

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 7:00:51 PM
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RO0634



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.

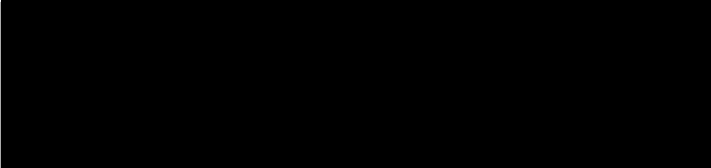
This form has two parts;

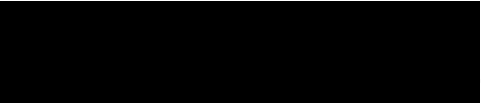
Part A - Personal Details

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

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

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:

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WA10 1HP**

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

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

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

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

Please continue on a separate sheet if necessary

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.

RO0635



St. Helens
Council

①-LPA06
②-Statement of Common Ground

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: MRS	Title:
First Name: JOYCE	First name:
Last Name: GENT	Last Name:
Organisation/company:	Organisation/company:
Address: 33 GILVIAN CRESCENT GARSWOOD, WIGAN.	Address:
Postcode: WN4 0SS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 7/3/2019
-----------------------	----------------

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

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 checked="" 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 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

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

1

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

Please continue on a separate sheet if necessary

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

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

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? (overseas) (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 in the oral part of the examination, please outline why you consider this to be necessary.

[illegible]

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

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

RO0636

EFO012

①-LPA05



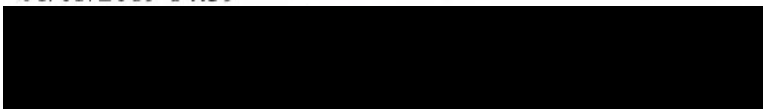
Representation Form

Claire Gerrard

to:

planningpolicy

08/03/2019 14:39



1 Attachment



St Helens Borough Local Plan 2020-2035 (Submission Draft) - sthelens.gov.uk (2).pdf

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Best place to find information and services that your council provides...

[St Helens Council Home \(https://www.sthelens.gov.uk/\)](https://www.sthelens.gov.uk/)

[/ Planning & building control \(https://www.sthelens.gov.uk/planning-building-control/\)](https://www.sthelens.gov.uk/planning-building-control/)

[/ Planning policy \(https://www.sthelens.gov.uk/planning-building-control/planning-policy/\)](https://www.sthelens.gov.uk/planning-building-control/planning-policy/)

[/ Local Plan \(https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/\)](https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/)

[/ Comment form](#)

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

Representation (i.e. Comment) Form

Please also read the Representations Form Guidance Note (/media/9460/lpsd-representation-form_guidance-note.pdf).

Please ensure the form is completed **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

Title: *

First Name: ***Last Name: *****Organisation/company:****Address: *****Postcode: *****Tel No: *****Mobile No:****Email:**

2. Your Agent's Details (if applicable)

(We will correspond via your agent)

Title:

First Name:**Last Name:****Organisation/company:****Address:****Postcode:****Tel No:****Mobile No:****Email:****Date: ***

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) *

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.

☒ **Yes (via e-mail)**

☐ **No**

Please submit your completed form by no later than 5pm on Wednesday 13th March 2019.

FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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

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

Please submit separate Part B forms for each comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and complete 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

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

Please read the guidance note for explanations of legal compliance and the tests of soundness.

Is legally compliant? *

☐ Yes

☒ No

Is sound? *

☐ Yes

☒ No

Complies with the duty to cooperate? *

☐ Yes

☒ No

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

Please read the guidance note for explanations of the tests of soundness.

- ☒ **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.

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 proposed plans do not take in to account the feelings and well fair of the local population. As a resident my house was purchased with the benefit of not being overlooked and surrounded by a 'housing estate'. The impact the proposed plans has on the local community has not been considered. The proposed plans are going to bring many problems go the local areas and do not consider the local environment and the

①

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

No building on greenbelt land

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? *

- ☐ 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 in the oral part of the examination, please outline why you consider this to be necessary:

All residents within the affected area need to be present to represent our community and find out exactly what action is being taken and to no that our concerns have been taken into consideration and addressed.

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.

Recaptcha field

I'm not a robot

reCAPTCHA
Privacy - Terms

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

Submit

A-Z Services (/a-to-z)

A (/a-to-z?letter=A) B (/a-to-z?letter=B) C (/a-to-z?letter=C)

D (/a-to-z?letter=D) E (/a-to-z?letter=E) F (/a-to-z?letter=F)

G (/a-to-z?letter=G) H (/a-to-z?letter=H) I (/a-to-z?letter=I)

J (/a-to-z?letter=J) K (/a-to-z?letter=K) L (/a-to-z?letter=L)

M (/a-to-z?letter=M) N (/a-to-z?letter=N) O (/a-to-z?letter=O)

P (/a-to-z?letter=P) Q (/a-to-z?letter=Q) R (/a-to-z?letter=R)

Contact Centre, Wesley House, Corporation Street, St. Helens, WA10 1HF, 01744 676789

S (/a-to-z?letter=S) T (/a-to-z?letter=T) U (/a-to-z?letter=U)

V (/a-to-z?letter=V) W (/a-to-z?letter=W) X (/a-to-z?letter=X)

Accessibility - Reading our information

(<https://www.sthelens.gov.uk/Accessibility/>)

My Location Service (<http://ishare.sthelens.gov.uk/>)

Privacy Statement (<https://www.sthelens.gov.uk/privacy-statement/>)

Contact Us (<https://www.sthelens.gov.uk/contact-us/>) Use Find My Nearest to find our services close to you.

GOV.UK (<https://www.gov.uk/>)



St. Helens First (/news/st-helens-first/)



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dition of the council's community magazine.

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(<https://www.facebook.com/sthelenscouncil>)



(<https://www.youtube.com/user/sthelenscouncil>)

RO0637

EFOO13

①-LPA05



Representation Form

Claire Gerrard

to:

planningpolicy

08/03/2019 20:39



1 Attachment



B Gerrard St Helens Borough Local Plan 2020-2035 (Submission Draft) - sthelens.gov.uk.pdf

Attached is the completed Representation Form.

Regards

Barry Gerrard

Welcome to sthelens.gov.uk

Best place to find information and services that your council provides...

[St Helens Council Home \(https://www.sthelens.gov.uk/\)](https://www.sthelens.gov.uk/)

[/ Planning & building control \(https://www.sthelens.gov.uk/planning-building-control/\)](https://www.sthelens.gov.uk/planning-building-control/)

[/ Planning policy \(https://www.sthelens.gov.uk/planning-building-control/planning-policy/\)](https://www.sthelens.gov.uk/planning-building-control/planning-policy/)

[/ Local Plan \(https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/\)](https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/)

[/ Comment form](#)

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

Representation (i.e. Comment) Form

Please also read the Representations Form Guidance Note (/media/9460/lpsd-representation-form_guidance-note.pdf).

Please ensure the form is completed **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).

- Date: is mandatory

PART A – YOUR DETAILS

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

1. Your Details

Title: *

First Name: ***Last Name: *****Organisation/company:****Address: *****Postcode: *****Tel No: *****Mobile No:****Email:**

2. Your Agent's Details (if applicable)

(We will correspond via your agent)

Title:

First Name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Date: *

Date: is mandatory

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) *

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.

☒ **Yes (via e-mail)**

☐ **No**

Please submit your completed form by no later than 5pm on Wednesday 13th March 2019.

FURTHER INFORMATION

If you require further information, please see the FAQs 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 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 submit separate Part B forms for each comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and complete 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

Yes

Paragraph / diagram / table

Yes

Policies Map

Yes

Sustainability Appraisal / Strategic Environmental Assessment

Yes

Habitats Regulation Assessment

Yes

Other documents

Residents not notified as per regulation

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

Please read the guidance note for explanations of legal compliance and the tests of soundness.

Is legally compliant? *

- ☐ Yes
☒ No

Is sound? *

- ☐ Yes
☒ No

Complies with the duty to cooperate? *

- ☐ Yes
☒ No

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

Please read the guidance note for explanations of the tests of soundness.

- ☒ **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.

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 proposed plans do not take in to account the feelings and welfare of the local population. As a resident my house was purchased with the benefit of not being overlooked and surrounded by a 'housing estate'. The impact the proposed plans has on the local community has not been considered. The proposed plans are going to bring many problems to the local areas and do not consider the local environment and the

①

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (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 local viable modification can be to not build on the land and for this to be retained as Green Belt land.

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? *

- ☐ 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 in the oral part of the examination, please outline why you consider this to be necessary:

I consider that every resident wanting to take part should have the opportunity to ensure that their point is put across and represented adequately.

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.

Recaptcha field

I'm not a robot

reCAPTCHA
Privacy - Terms

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

Submit

A-Z Services (/a-to-z)

A (/a-to-z?letter=A) B (/a-to-z?letter=B) C (/a-to-z?letter=C)

D (/a-to-z?letter=D) E (/a-to-z?letter=E) F (/a-to-z?letter=F)

G (/a-to-z?letter=G) H (/a-to-z?letter=H) I (/a-to-z?letter=I)

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M (/a-to-z?letter=M) N (/a-to-z?letter=N) O (/a-to-z?letter=O)

P (/a-to-z?letter=P) Q (/a-to-z?letter=Q) R (/a-to-z?letter=R)

Contact Centre, Wesley House, Corporation Street, St Helens, WA10 1HF, 01744 676789

S (/a-to-z?letter=S) T (/a-to-z?letter=T) U (/a-to-z?letter=U)

V (/a-to-z?letter=V) W (/a-to-z?letter=W) X (/a-to-z?letter=X)

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Contact Us (<https://www.sthelens.gov.uk/contact-us/>) Use Find My Nearest to find our services close to you.

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St. Helens First (/news/st-helens-first/)



Select Language ▼ tion of the council's community magazine.

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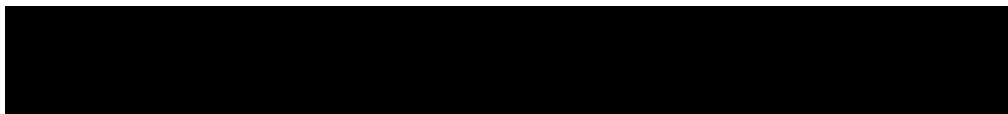


(<https://www.youtube.com/user/sthelenscouncil>)

RO0638



Local Plan
Paul Gerrard
to:
planningpolicy
12/05/2019 16:55



1 Attachment



representation-form 1.doc

Please find attached



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: Mr	Title:
First Name: Paul	First name:
Last Name: Gerrard	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:



Date:

10 May 2019

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

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

Yes ☒ (Via Email)

No ☐

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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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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input 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 wish to object to the Local Plan, with particular regard to the areas marked as 4HA / 5HA. The local Plan will have a massive impact on the residents of Bold Ward, there is no infrastructure in place to accommodate such a largescale Build.
There will be large scale damage to the environment, loss of wildlife habitat and loss of numerous species of fauna and flora. Along with damaging the success of the Bold Forest Park Action Plan by undermining the policies of the plan.
The plan will lead directly to urban sprawl, causing two different areas to become combined into one, Clock Face and Sutton Manor, it will also allow the areas known as Four Acre / Bentley St to expand into 5HA. These areas already suffer high levels of antisocial behaviour.
It will lead to a direct increase in vehicular traffic in the areas having a negative impact on residents of Bold, both health wise and increasing traffic nuisance.

This plan started in 2016 as the preferred plan with protected areas guaranteed till 2035, only to be revisited 2018, and building brought forward. What is to stop this plan being brought forward again once these areas have been populated.

Please continue on a separate sheet if necessary

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

The proposed plan should be reconsidered, and the house numbers, spread across all of the wards evenly giving due consideration to areas that have already been the subject of planning builds over the last few years.

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Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

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:

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

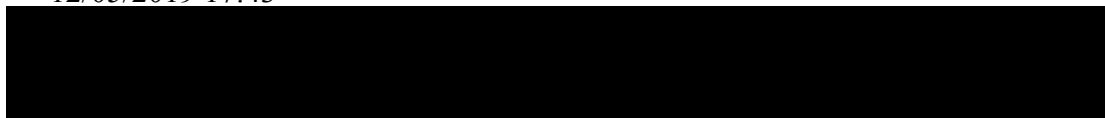
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0639



Local plan
Carole Gerrard
to:
planningpolicy
12/05/2019 17:43



1 Attachment



representation-form (3).doc

Please find attached



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.

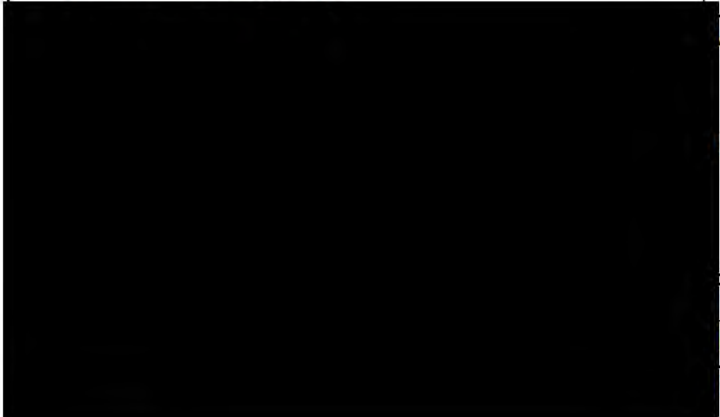
This form has two parts;

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>Carole Ann</u>	First name:
Last Name: <u>Gerrard</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:



Date:

10 May 2019

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

Would you like to be kept updated of future stages of the St 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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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.

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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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Yes, I wish to participate at the oral examination

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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.

RO0640



St Helens
Council

651

13 MAR 2019

Ref: LPSD

(For official use only)

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

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

Please ensure the form is returned to us **by no later than 5pm on 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: Ben	First name:
Last Name: Gerrard	Last Name:
Organisation/company: GAMMA Telecom	Organisation/company:
Address: 56 Crawford Street	Address:
Postcode: WA9 4XH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature

Date:

21/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

RO0641



St. Helens
Council

652

13 MAR 2019

Ref: LPSD

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

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: STEPHEN	First name:
Last Name: GERARD	Last Name:
Organisation/company:	Organisation/company:
Address: 56 CRAWFORD ST CHALK FACE ST. HELENS	Address:
Postcode: WA9 4XP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11-3-18

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	LPA02 LPA07 LPA09 LPA06	Paragraph / diagram / table	4-18-12 4-25	Policies Map	4HA 5HA	Sustainability Appraisal/ Strategic Environmental Assessment	✓ ✓ ✓ ✓	Habitats Regulation Assessment	✓
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

THE PLAN IS NOT CONSISTENT WITH NATIONAL GREEN BELT POLICY BECAUSE MAJOR SETTLEMENTS WILL MERGE INTO EACH OTHER. ALSO THERE IS A LARGE ~~SETTLEMENT~~ NETWORK OF PUBLIC FOOTPATHS WHICH IS ON THE PLAN. ALSO A LARGE VARIETY OF PROTECTED SPECIES, BATS, WATER VOLES, FERRIS DWLS, INWETS. ALSO POLICY LPA07 IS NOT SOUND

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.

SCRAP 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.

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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="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:

<div></div>

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.**

RO0642

653

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>PAULA</u>	First name:
Last Name: <u>GERARD</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>56, CLAWFORD STREET</u>	Address:
<u>CLOCK FACE, ST. HELENS</u>
Postcode: <u>WA9 1XX</u>	Postcode:
Mobile No:	Tel No:
.....	Mobile No:
.....	Email:

Signature: <u>[Redacted]</u>	Date: <u>11.3.19</u>
------------------------------	----------------------

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

**Local Plan
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planningpolicy@sthelens.gov.uk

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats 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>
<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 agree with Bold / clock face action group policy statement.</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.

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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.

RO0643



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)

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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: JUDITH	First name:
Last Name: GERARD	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 9 Ansdell Villa Rd Rainhill	Address:
Postcode: L35 4PN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

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)

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Telephone: 01744 676190

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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	LPA 06	Paragraph / diagram / table	345	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	No <input type="checkbox"/>	Don't know
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

Please continue on a separate sheet if necessary

A, The government attaches great importance to the Green Belt, which is to check the unrestricted sprawl of large built up areas, to assist in safeguarding countryside from encroachment.

The Parcel of land 3HS is an area that prevents neighbouring towns merging into another Prescott, Rainhill, Thatto Heath, this part of our Green Belt needs protecting. The release of Greenbelt land will cause significant harm to the purpose of having Greenbelt.

B, There has been a decade-long study which was published two years ago in the Lancet that found

1, That one in ten dementia deaths of people living within 50 meters of a busy road. A study by a Canadian public health scientists was first to find this link. A Professor Tom Denning from university of Nottingham has said "this study does ask serious questions about the environment where many people live".

2, Air pollution is already known to contribute to deaths of around 40,000 people in Great Britain each year by exacerbating respiratory and heart conditions. 2013 to 2015, St Helens averaged 51.9 deaths per 100,000 from respiratory disease in the under 75s compared to 44.3 for the North West and 33.2 for the rest of England. 3, If 500 more houses are built on 3HS this will then put another 1,000 cars, service vans, delivery vans on to the already busy B Roads.

C, The release of Green Belt will cause significant harm to the whole purpose of having Green belt, 3HS area is not sustainable due to lack of school places, Hospitals and A&E facilities, Doctors and Dentist surgeries

E, The junction of Warrington road and Rainhill road (Skew Bridge junction) are shown to be at capacity confirmed by council figures. More cars, delivery vans will cause more traffic jams plus extra load weight on an old bridge.

F, Rainhill Road is classed as a B road but takes a large amount of traffic and at peak times it is heavily congested, this means we have cars idling by the traffic light by the *Coach and horses as they cannot proceed on their journey on account of the road traffic light on Warrington rd. and Rainhill junction. Rainhill Road will not be able to widen without knocking houses down*

Page 2

G, There is enough Brownfield Land in St Helens to build 5808 houses on, so there should be no need to remove so much of the Greenbelt Land.

I, We have seen the premises that Rainhill Community Police officers use closed, they have also closed the Thatto Heath police station. This means we rely on Police coming from ST Helens town centre, to police our area, if we now have another 500 houses built we will not have an effective Policing.

J, there removal of a sporting facility will be a great loss to the health and welfare of the people of Rainhill

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 LTR Land from the proposed removal from the Green belt. Therefore abiding with National Planning Policy Framework (2019)
The Council should reconsider LTR Land from Green belt to place in safeguarded

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)

<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.**

RO0644



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: MRS CARRIBBS MISS	Title:
First Name: JULIE	First name:
Last Name: CARRIBBS	Last Name:
Organisation/company:	Organisation/company:
Address: 260 CARTONS LANE	Address:
Postcode: WA9 4RA	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

8-4-19

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.

RO0645



St. Helens
Council

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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: <i>John</i>	First name:
Last Name: <i>GIBBONS</i>	Last Name:
Organisation/company: <i>RETIRED</i>	Organisation/company:
Address: <i>60, GORSEY LANE CLOCK FACE ST HELENS</i>	Address:
Postcode: <i>WA9 4XB</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>21 04 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 ☐

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RO0646



st helens local plan 2020-2035 representation form.
Simon G
to:
planningpolicy
12/03/2019 21:14



1 Attachment



lpsd-representation-form-SGibson.docx

Hello there,

Please find attached my representation form for the st helens 2020-2035 local plan. Could you let me know that you received this please?

Regards,
Simon.



St. Helens
Council

Ref: LPSD

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

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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

Title: Mr

First Name: Simon

Last Name: Gibson

Organisation/company:

Address: 28 FairHolme Avenue,
Eccleston Park,
Prescot

Postcode: L34 2RW

2. Your Agent's Details (if applicable)

(we will correspond via your agent)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No: [REDACTED]

Tel No:

Mobile No:

Mobile No:

Email: [REDACTED]

Email:

Signature:

[REDACTED]

Date:

12/03/2019

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

Yes (Via Email) ☒

No ☐

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

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

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

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

Please tick as appropriate

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

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

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

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

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

- The roads around the proposed site (3HS) in my opinion are already struggling to cope with traffic, especially at peak times. An additional 1437 along with the traffic this would bring would cause untold traffic nightmares!
- Increased traffic would also decrease air quality in the area possibly impacting health. [REDACTED] and moved to a greener area to combat it.
- I'm also concerned that removing the greenbelt would remove any separation we have between areas. It would become one large concrete sprawl.
- Schools and health facilities already feel at capacity in the area, waiting lists for doctors is already over a week in most surgeries. Adding 1437+ occupants would push this to a failing point in my opinion.
- The water table in this area is also very high, there have already been examples of flooding near scotch barn lane with the new developments there. Concreting over ecclestone park golf course would certainly pose a risk for future flooding in adjacent areas in my opinion.
- The land on 3HS also supports many species of flora and fauna including 13 that are of a protected status.
- Objections from sport England (a statutory government consultant) regarding the change from a golf club have yet to be answered and any evidence of over subscription of golf within the local area has not been put forward.
- In table 4.6 it shows a requirement for 7245 houses, this equates to an additional 1437 houses being needed and 57 hectares of extra land needed, this doesn't add up to the 288 hectares proposed in table 4.5.

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 this land from the greenbelt should be deleted abiding with the national planning policy framework (2019).

Consideration to put the land in to a "safeguarded" status should also be deleted.

Please continue on a separate sheet if necessary

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

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

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

RO0647

860

21 MAR 2019

Ref: LPSD

11/03/2019

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

Signature: _____	Date: <u>13.03.19</u>
------------------	-----------------------

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Would you like to be kept updated of future stages of the St 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 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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NEXT STEPS

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

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <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>1 How and why where Taylor wumpy able to buy Greenbelt Land in 2016</p> <p>2 Are wildlife being protected</p> <p>3. At what point will development stop due to overcrowding and lack of space to move freely.</p>

Please continue on a separate sheet if necessary

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RO0648

21 MAR 2019

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Ref: LPSD

St. Helens
Council

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JACQUELINE

Last Name: GILBERTSON

Organisation/company: _____

Address: 2 ROSEHILL AVE

BOLD

ST HELENS

Postcode: WA9 4SX

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13.03.2019

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☐ No

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

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

Please tick as appropriate

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

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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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RO0649



St Helens
Council

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

Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MISS</u>	Title:
First Name: <u>Km Awan</u>	First name:
Last Name: <u>Gilardi</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>18 Station Rd</u> <u>Garswood</u>	Address:
Postcode: <u>WN4 0SA</u>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>03-05-19</u>
-----------------------	-----------------------

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

Yes ☒ (Via Email)

No ☐

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

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St. Helens Council
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Merseyside
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3. To which part of the Local Plan does this representation relate?

Policy <i>LP05</i>	Paragraph / diagram / table <i>(1)</i>	Policies Map	<i>1HA</i>	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 checked="" 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 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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Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the

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

Please continue on a separate sheet if necessary

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

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

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

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Policy	Paragraph / diagram / table		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment			
LP06	9			IHS					
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 checked="" 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

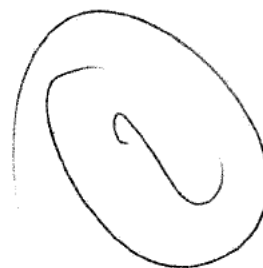
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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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school causing an obstruction to all road users, this is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



Please continue on a separate sheet if necessary

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

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

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.

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:

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

RO0650

①-LPA06 ②-Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0086
Type of Submission	Web submission
Full Name	Mr Marc Gill
Organisation	N/A
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	LPA06
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.

The plan to remove eccleston park golf club from green belt to potentially be built on is wrong.

- The local infrastructure is already at breaking point. [REDACTED] rainhill which borders eccleston park golf club and the traffic is already terrible, especially in the mornings and evenings so even more homes will cause even greater chaos. Two butt lane and holt lane are often congested. Warrington road going over the bridge, through rainhill village and connecting to the M62 is always congested.
- Trying to get an appointment at the doctors is already impossible so even more people would make it worse.
- The local schools are already at capacity so I don't know where the children would go?
- 2 Housing developments are already being built on scotchbarn lane in knowsley just down the road from the golf club. Also 2/3 more on carr lane in knowsley in prescot is being built. Also halsnead village is being proposed in knowsley in whiston which is a huge housing development. All this housing in such a small area is a huge strain on the local area and I doubt st helens council and knowsley council have communicated with each other about all their planned developments/green belt removing. Surely if they had they would agree the area is becoming saturated with housing.
- The golf course acts as an area that splits rainhill/whiston/eccleston/thatto heath, removing it from green belt and building on it would make it one large urban sprawl causing so much strain as already mentioned.

①

②

- Mulberry homes have already purchased the site even though it is in greenbelt and there have been many meetings between st helens council and mulberry homes alot of which were unminuted. I find this highly suspicious and I am uneasy with these meetings and the fact thay a housing company has bought a large piece of greenbelt land which they are unable to build on and suddenly the council propose to remove the land from greenbelt staus in there local plan
- st helens population has actually decreased over the decades so i believe their is no need to build more housing in the area as their is sufficent housing stock already.
- The leader of st helens council has stated building on brownfield sites is a priority, and their is brownfield sites available which should be used first before even considering releasing greenbelt land.
- old housing on gilbert road by the new housing on scotchbarn lane have seen flooding. More housing will cause more flooding risks.
- I walk on the golf course and think it is a great recreational area that shouldnt be lost. It has a great variety of flora and fauna. I have seen bats flying over the area in the evenings and they may potentially roost in the area.
- more housing will mean more cars and more pollution causing more health problems and straining the nhs system further. Furthermore the golf course is a great green area helping against pollution and improve air quality.
- [REDACTED] was terrible and more homes were getting built [REDACTED] and believe that removing the golf club from green belt will be detrimental to the local area and to my [REDACTED] future.
- I think it is irresponsible to put this plan forward with the current situation regarding brexit. You cant make a long term plan on such an important issue when we dont know the long term plan for the country. After brexit the housing situation may change, rules regarding greenbelt plans may change and to continue down a path set out in the local plan is poor planning when the actual rules for the plan may change

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

The council should not consider removing the land from greenbelt to place in safeguard. The council should delete this land from the proposed removal from greenbelt land so abiding by 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	3/13/2019 12:29:59 PM
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RO0651



St. Helens
Council

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: <u>Mrs</u>	Title: _____
First Name: <u>ELAINE</u>	First name: _____
Last Name: <u>GILLARD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>7 THORNTON RD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0BW</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20-2-19</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.**

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 Regulations Assessment	
		IHA							
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

*** DON'T KNOW NOT ENOUGH INFORMATION**

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.

THE RELEASE OF GREEN BELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT, USE BROWNFIELD FIRST. WE WILL NEED GREENBELT TO PROVIDE FOOD FOR THE FUTURE. THE ACCESS SITES WOULD BE INADEQUATE, POOR POLICING AT THE MOMENT WILL INCREASE IF GREENBELT IS USED. NOT ENOUGH FACILITIES FOR EXTRA HOUSING POPULATION ESTIMATES "WHERE ARE ALL THE EXTRA PEOPLE COMING FROM." POOR GP AND PHARMACY FACILITIES FOR INCREASE OF PEOPLE

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL
FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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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.

RO0652



St. Helens
Council

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

Ref: LPSD

01 MAR 2019

(For official use only)

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Part B - Your Representation(s)

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Peter</u>	First name: _____
Last Name: <u>GILLARD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>7 Thornhill RD</u>	Address: _____
<u>SARSWOOD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0SW</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20/2/19</u>
------------------	----------------------

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

☒ Yes (via email)

☐ No

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

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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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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	
LPA 05									
Site 14A									
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 <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <i>Not enough information</i>
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 the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>"<u>POPULATION ESTIMATES</u>" <i>where ARE ALL THE EXTRA PEOPLE coming from?</i></p> <p>The release of green BELT will cause significant harm to purposes of the greenbelt</p> <p>Lack of school places Doctor surgeries Bus routes + rail services</p> <p>any necessary highways work must be funded by <u>development</u></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

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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

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

Please keep a copy for future reference.

RO0653

EL0098



Removal of green belt site IEA
Keith Gleave
to:
planningpolicy
12/03/2019 14:40

IEA

1 Attachment



St Helens green belt objection.docx

① - LPA 4

② - LPA 4.1

Please find my objection to the removal of this area from the St Helens green belt.
Please reply to show it has been delivered.

Thanks

Keith

increasing volumes of traffic resulting in gridlock at certain times of the day. This extra traffic will only exacerbate the problems.

The Omega development is suffering from a number of issues relating to HGV's including parking in inappropriate areas, which includes outside the local junior school. Inappropriate actions from HGV drivers as to their toilet habits in both forms, only recently has a discarded pizza box from one HGV been found to contain faeces, in close proximity to the school. In extending Omega with more big sheds all these issues will be multiplied.

①
②
Highways
Pavement

If this were to be taken out of the green belt, then the extra 70 hectares would no longer be a green lung but would add to the pollution in the area. The highest amount of pollutant would be that of heavy diesel particulates because of the amount of HGV's serving these sheds. Airborne pollution does not appear to be taken seriously by Warrington borough council and it seems a paradox to me that the executive board holder for planning also has environmental protection in the role.

Pollution

The land currently forms part of the Bold estate and forest. It would mean the removal of many, and looking at the rest of the Omega development, all the mature trees and remaining flora and fauna. Animals have been completely removed from the existing development with an argument they have the land over the St Helens boundary, they will have no further to go and their habitat destroyed, not to mention the ancient oaks that exist.

Trees
&
biodiversity

As mentioned earlier this does not comply with the national planning policy framework in its determination of the green belt. It is there to stop urban sprawl, to prevent one town merging into its neighbours so giving definition to the overall area. To safeguard the countryside from encroachment and encourage the use of derelict and brownfield urban sites.

GB -
urban
sprawl

It would appear that the developer along with Warrington borough council is of the belief that this removal of green belt and development of this site is guaranteed due to their future proposals and naming of the area. This shows little thought for local residents and their wellbeing. There is no further green space in the area and taking this land out of green belt is only removing more and making the built environment all encompassing. People have a right to green space and the ability to breathe clean air, which also has an impact on two schools (junior and high school) and also a sixth form college. There have recently been strong suggestions that all engine idling should be banned

air
pollution

outside schools, the types of emissions emanating from the vehicles detailed here are of the worst kind and would therefore only contribute to illness and early mortality rates among our children.

In conclusion

I contend that this proposal to remove this parcel of land from the green belt should be refused on the grounds below

1. Its lack of compliance with the national planning policy framework
 - To check the sprawl of large urban areas
 - To prevent the merging of towns into one another, therefore non-descript areas
 - Safeguarding the countryside from encroachment and protecting farmland
 - The encouragement to use both derelict and brownfield sites
2. The increase in pollution, particularly heavy diesel particulates
3. The illness levels and early mortality that would ensue from the types of particulate pollution
4. There would no longer be a defined boundary between Warrington and St Helens
5. No sustainable reasons have been put forward for this change
6. The proposal is purely a financial one on behalf of Warrington borough council with little gain to St Helens
7. The loss of habitat and its flora and fauna which once gone is lost forever

① +
②

I would like to be kept informed by letter and e mail of any meetings or formal hearings. If this passes to the planning inspectorate or other official body, I wish to be informed as I would wish to make representations. I state these wishes as I am not a resident of St Helens so do not see items posted in the local St Helens press etc.

Yours Sincerely

Keith Gleave



Removal of green belt for omega west
Keith Gleave
to:
planningpolicy
10/05/2019 14:03



1 Attachment



St Helens green belt objection_may19.docx

Please find my further objections to the removal of green belt land on the border of Warrington

Thanks

Keith

51 Bembridge close

Great Sankey

Warrington

WA5 3RH

10/05/2019

Re: Consultation on removal of St Helens green belt, site 1EA

Further to my previous comments on St Helens council wishing to remove land out the greenbelt at the request of Warrington Borough Council to create Omega West, I have a few further observations.

In requesting to take a further 70 acres out of greenbelt to increase and meet the amount of employment land Warrington requires, I draw your attention to the amount of housing that is currently being built on Omega and Lingley Mere, in the order of 70 acres. There are further plans to place more housing on Omega, indeed more developments that are not employment. I therefore contend that there are no requirements to pillage this area of wood and farmland.

The amount of employment land designated in the southern section of Warrington is also a vast portion of land with the same type of employment designation as that required for Omega west. Again I would contend that this meets the requirements for Warrington.

In the very near future the Fiddlers Ferry generating station in Penketh will be going offline and closing, as it's a fossil fuel burning station. The area of land contained here is again vast. It would be the preferred option of a brown field site ripe for regeneration. Undoubtedly remediation of the site would have to take place but this would not be to the same level as that required by a domestic housing development. So again I would contend there is no requirement to take land out of the greenbelt.

In stating the above there are many other items of guidance provided on the greenbelt, including the following:-

“The urban fringe is the nearest opportunity for outdoor recreation for large numbers of people in

Urban areas, if the land is publicly accessible. Land in these locations will be increasingly

Valuable for food and energy production in future. Such land should not just be kept open, but should be positively managed, through such initiatives as multi-functional community forests." Guidance 2015. Hence Bold Forest Park – and many people use this landscape – proposed development will destroy the view. Currently a strong tree-lined boundary.

"National planning policy makes provision for changes to be made to the Green Belt. Critically, changes to the Green Belt are made through the local plan. In order to make a change to the Green Belt boundary in the local plan there have to be 'exceptional circumstances' (NPPF para 83)."

"The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances." Hunston High Court Judgement, St Albans

'Local planning authorities should, through their local plans, meet objectively addressed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as whole, or specific policies in the Framework indicate development should be restricted'. The Guidance notes that Green Belt is identified in the NPPF as such a policy.' From Planning Policy Guidance 2014

'In the 6 November 2014 report the Inspector says, 'It therefore seems to me that these are significant flaws in both the process and evidence relating to the release of land from Green Belt, particularly given the recent clarification of national guidance on the significance of the Green Belt'. The comment appears to suggest that with bar raised politically at least, the onus on the Council to explain and justify its position in relation to the Green Belt is that much greater at present.'

'The current arrangements for strategic planning through local plans established by the Duty to Cooperate in the Localism Act 2011 and the soundness tests in the NPPF are relevant to the consideration of Green Belt." So all the same rules apply under 'duty to co-operate'.

I would like to be kept informed please of any planning inspectorate meetings and or consultations.

Yours Sincerely

Keith Gleave

RO0654



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>STUART</u>	First name: _____
Last Name: <u>GUENNIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CRANTOCK CLOSE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6ET</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>12 MAR 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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RETURN DETAILS

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

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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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? SHS + ALL GREEN BELT SITES									
Policy LPA 06 SHS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/> NO
Justified?	<input type="checkbox"/> NO
Effective?	<input type="checkbox"/> NO
Consistent with National Policy?	<input type="checkbox"/> NO

<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>PLAN IS BASED ON FLAWED METHODOLOGY</p> <p>PLAN IS NOT DELIVERABLE</p> <p>PLAN DOES NOT COMPLY WITH NPPF 2018</p> <p>REFER TO ECRA ORGANISATION</p> <p>CORRESPONDENCE TO THE COUNCIL.</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.

① SEE SEPARATE LETTER

② I TOTALLY AGREE WITH ALL
THE POINTS PUT FORWARD
BY ECRA OF WHICH
YOU HAVE DETAILS

Please continue on a separate sheet if necessary

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

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Please keep a copy for future reference.

REF: LPSD 8HS.

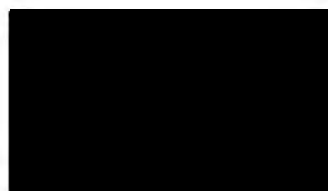
GREEN BELT PRIME ARABLE LAND AS 8HS
OR ANY OTHER GREEN BELT LAND SHOULD NOT
BE USED FOR HOUSING DEV. WHILE CONTAMINATED
LAND AND BROWNFIELD SITES ARE AVAILABLE.
AS AN OLD INDUSTRIAL TOWN ST. HELENS HAS
THESE SITES IN ABUNDANCE.

GREEN BELT IS THE "LUNGS" OF ST. HELENS.

GREEN BELT SHOULD BE LEFT FOR OUR
CHILDREN AND FUTURE GENERATIONS.

WE SHOULD NOT LEAVE THEM CONTAMINATED
LAND OR BROWNFIELD SITES. THESE SHOULD
BE CLEANED UP AND BUILT ON FIRST.

DEVELOPERS AND OUR COUNCIL SHOULD NOT
BE ALLOWED TO TAKE THE EASY OPTION
OF GREEN BELT HOUSING DEVELOPMENT



RO0655



St. Helens
Council

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

Ref: LPSD

12 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>MRS</u>	Title: _____
First Name: <u>VIVIENNE</u>	First name: _____
Last Name: <u>GLENNIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CRANTOCK GR.</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6ET</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>11 March 2019</u>
------------------	----------------------------

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

☐ Yes (via email)

☐ No

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St Helens
WA10 1HP**

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PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate? <i>SHS</i>									
Policy <i>SHS</i> <i>LPA06</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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

<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><i>Plan is based on flawed methodology</i> <i>Plan doesn't comply with NPPF 2018</i> <i>Plan is not deliverable</i> <i>I am in total agreement with EcRA notifications to the council</i></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.

See separate letter

Please continue on a separate sheet if necessary

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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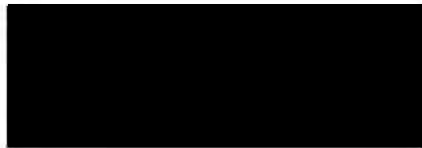
Green belt 8HS is prime agricultural farming land and should be left for future generations.

The letter (dated 25 January) from the council to occupiers addresses is TOTALLY MISLEADING.

It states safeguarded sites development before 2035 will be refused.

That statement could be overriden by a new plan.

I fully endorse all the points made by ECR in their correspondence to the council.



RO0656

270

PF 0249

Ref: LPSD

01 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>MISS</u>	Title:
First Name: <u>LEAH</u>	First name:
Last Name: <u>GLYNNE-MANLEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 Smack Lane</u> <u>Garswood St</u>	Address:
Postcode: <u>WN4 0SN</u>	Postcode:
Tel No:	Tel No:
Mobile: [REDACTED]	Mobile No:
Email:	mail:

Signature: [REDACTED]	Date: <u>28-2-19</u>
-----------------------	----------------------

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

1HA 1H5

Policy LPA12 LPA11 LPA07 LPA08 LPA04	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?

☒ Yes

☐ No

Sound?

☒ Yes

☐ No

Complies with the Duty to Cooperate

☒ Yes

☐ No

Please tick as appropriate

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

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

Positively Prepared?

☐

Justified?

☒

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 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.

Brexit requires us to be more self-sufficient so loss of grade 2 fields - No schools to support high increase in pollution so increase in health problems no budget / health to support increase St Helens population has declined and is continue to so no need to build these houses as OAN doesn't support this number - Traffic junction 23 is already under strain with this plus Frinds farm it would be a major standstill - Mental health will decline due to the amount of greenbelt already taken in this area - Cost of sending child to Wigan is 5K so doesn't make cost effective for St Helens

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.

- Provision to be made for secondary & primary schools + flood risk area.
- Health Service that exist - not a big clinic.
- Transport - regular trainings taken and regular maintenance facilities in station required now.
- Shop was stopped due to high traffic in area.
- There is 500 plus cows going to affect area if one shop is stopped?
- Better provision required of farmland. Required to support this.

Please continue on a separate sheet if necessary.

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

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RO0657



St. Helens
Council

271

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Ref: LPSD

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr R Glyn Harley</u>	Title: _____
First Name: <u>Reece</u>	First name: _____
Last Name: <u>Glyn Harley</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>34 Smock Lane</u> <u>Garswood</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>28/2/19</u>
-----------------------	----------------------

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3. To which part of the Local Plan does this representation relate? 1+1A / 1+1S									
Policy LPA07 LPA11 LPA08		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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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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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.

no schools or secondary schools being built.
Junction 23. Extra 500 plus cars on a already
dangerous junction to many houses being built
around Garwood / Haydock for this
junction to support major accidents happen
regular road - 20 min journey times. 1 hour
for trains to support Disabled / Frail / Station
inadequate / already taken a lot of green belt
from area. A new train car construction which
will affect pollution + traffic to high levels

A gym will increase
No powers to support increase as decline
in area - No mention of new schools

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.

Stop Building in Haydock Barrow -
 it is over used now cannot support
 junction 23 - high levels - Health risk.
 Improve infrastructure of Sarswood houses
 now - Flooding / GRADE 2 farmland needed -
 Build Secondary School as none
 to support. / we use Wigan Council now
 costing £5000 a year ^{per pupil} which can't
 justify use - or money council spend

Please continue on a separate sheet if necessary

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

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RO0658



St Helens Borough Local Plan 2020-2035
Godwin Brenda
to:
planningpolicy
12/03/2019 10:27



ST HELENS BOROUGH LOCAL PLAN

From: Mrs Brenda Godwin

79 Higher Lane

Rainford

St Helens

02/03/2019

Re: Proposed removal from Green Belt of land East of Rookery Lane and South of Higher Lane.

Area: **8HA** (12HA)

1) GENERAL

The estimates for the numbers of new houses needed in St Helens are still based on out-dated data. More up-to-date figures show that present plans are an overestimate of the housing needs for a declining population of the borough.

Building in this area is also very unlikely to contribute to the affordable housing that is needed for St Helens. Housing in Rainford is relatively expensive and houses built on this land will inevitable service the needs of commuters to Liverpool and Manchester rather than helping with any shortage of housing for the less wealthy residents of the borough.

2) FARMING LAND

This area is prime farming land presently farmed by TWS. They have made it clear that the loss of this land will inevitably lead to job losses. As one of the aims of the plan is to maintain and increase employment this goes directly against one of its aims

Also at this time with the uncertainties of Brexit , we are being told that this country needs to produce more of its

own food. How can taking land out of food production, at this time, be a sensible po

3) EFFECT ON RAINFORD

a) Traffic

The building of 259 houses in this area is likely to lead to approximately 400 cars on this development. The plan calls for SAFE exits on to Rookery Lane and Higher Lane without any indication as to how this could be achieved. There seems very little prospect of this, especially into Rookery Lane. Considering that the vast majority of these homes will have two wage earners we have the prospect of the vast majority trying to leave at a very similar time on the morning of a working day. The majority of these cars are likely to be travelling through the junction at Windle. The improvements being made at this junction at present are based on present traffic not on traffic numbers inflated by this development. It is likely therefore, that there will still be problems at this junction.

b) Primary Schools

This development would clearly add a large number of children of primary school age to the population of Rainford. These numbers would clearly not be sufficient for the building of a new school. So all of these children would have to be incorporated into the present three primaries, as it is clearly unacceptable for them to be required to travel out of the village. There seems to be no possibility of Rainford C of E expanding. Even if it was possible for Brook Lodge to do so, which seems unlikely, any addition to the present traffic chaos in this area caused by Rainford High and Brook Lodge is surely unacceptable. There may be a few spare places at Corpus Christie but any expansion here is unlikely to help as it is a Catholic school and unlikely to be acceptable to the majority of parents.

In conclusion this proposal appears to call for houses which are unnecessary, will do nothing to address the real needs of St Helens' residents, remove prime farming land from the nations stock, causing unemployment in the process, lead to travel chaos, at the very least on working mornings and cause huge problems for primary education in Rainford

RO0659



Local plan 2020-2035
 Paul Godwin
 to:
 planningpolicy
 12/03/2019 10:28



ST HELENS BOROUGH LOCAL PLAN

From: Mr Paul Godwin

79 Higher Lane

Rainford

St Helens

02/03/2019

Re: Proposed removal from Green Belt of land East of Rookery Lane and South of Higher Lane.

Area: **8HA** (12HA)

[if !supportLists]-->1) <!--[endif]-->GENERAL

The estimates for the numbers of new houses needed in St Helens are still based on out-dated data. More up-to-date figures show that present plans are an overestimate of the housing needs for a declining population of the borough.

Building in this area is also very unlikely to contribute to the affordable housing that is needed for St Helens. Housing in Rainford is relatively expensive and houses built on this land will inevitable service the needs of commuters to Liverpool and Manchester rather than helping with any shortage of housing for the less wealthy residents of the borough.

[if !supportLists]-->2) <!--[endif]-->FARMING LAND

This area is prime farming land presently farmed by TWS. They have made it clear that the loss of this land will inevitably lead to job losses. As one of the aims of the plan is to maintain and increase employment this goes directly against one of its aims

Also at this time with the uncertainties of Brexit , we are being told that this country needs to produce more of its own food. How can taking land out of food production, at this time, be a sensible po

EFFECT ON RAINFORD

a) Traffic

The building of 259 houses in this area is likely to lead to approximately 400 cars on this development. The plan calls for SAFE exits on to Rookery Lane and Higher Lane without any indication as to how this could be achieved. There seems very little prospect of this, especially into Rookery Lane. Considering that the vast majority of these homes will have two wage earners we have the prospect of the vast majority trying to leave at a very similar time on the morning of a working day. The majority of these cars are likely to be travelling through the junction at Windle, The improvements being made at this junction at present are based on present traffic not on traffic numbers inflated by this development. It is likely therefore, that there will still be problems at this junction.

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RO0660



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: Jodie	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address: Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

13/05/19

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.

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	LPC08	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 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 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

Please continue on a separate sheet if necessary

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.

We wish to put forward arguments against the removal from Green Belt of land parcel TTA4/GBL-074 and its allocation for housing as we believe the council's ~~argument~~ position is flawed.

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.

<input type="checkbox"/>	No , I do not wish to participate at the oral examination
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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 <i>LPA09</i>		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 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 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

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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel H14/CBL074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helier Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

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

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

Please continue on a separate sheet if necessary

Yes, I wish to participate at the oral examination

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>LP206</i>	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 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 checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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Unfortunately we do not know which policies to target as our representation, but we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4TGBP-074 and its allocation for housing as we believe the council's position is flawed. All the arguments we wish to put forward are within the attached document, which is - Assessment of the St Helens local plan and green belt review and phase one habitat survey.

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)

<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:

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	LPC 05	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 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 checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

Please continue on a separate sheet if necessary

Unfortunately we do not know which ~~the~~ policies to target as our representation, but hope we have addressed the correct ones. We wish to put forward arguments against the removal from the Green Belt of land parcel HA4/GBP-074 and its allocation for housing, as we believe the council's position is flawed.

Assessment of the St Helens Local Plan and Green Belt Review and the Phase 1 habitat survey.

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

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

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

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

Assessment of the St Helen's Local Plan and Green Belt Review

A report on behalf of the residents/owners of the
French Fields development, Clock Face
January 2017 and May 2019

13 MAY 2019

Version history:

- V1 Submitted January 2017
- V2 Re-submitted January 2017 with minor orientation corrections
- V3 March 2019:
 - a) *Cover page, and Foreword and Additions for the March/May 2019 representation added*
- V4 March 2019: Formatting and proofing corrections
- V5 May 2019:
 - a) *Updated to refer to records from Merseyside Bio-Bank and to include the citation for LWS_108*
 - b) *Updated to include results and observations from a Phase 1 habitat and bat transect surveys – added as Appendix*
 - c) *Added maps to show the differences in land parcel labelling as an Appendix. This is to assist in the reading of this report as land parcel labels have changed completely.*

Author: Glenys McBain, BSc (Hons)

Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."
 - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
*"Likely to generate **negative effects**" for*
 - SA1. To protect and enhance biodiversity
 - SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

-
- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document. 02
-

- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03
This is significant.
-

- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise. 04
-

2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
- 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017). 05
- 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
- 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
-

3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

- 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

"Likely to promote positive effects"

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."

It also scores SA5 using similar designations at several other land parcels for similar reasons.

However:

- 3.2. There are no recommendations as to how this could be achieved.

- 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
- 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS. 06
- 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.

- 3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).

- 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore:
 - Removing HA4 from Green Belt increases risk to its GI;
 - Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole
 - The remaining Bold Forest Park GI does not have infinite capacity.07
08

- 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09

- 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.

4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;

- 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
- 4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub.
- 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park. 10
- 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.

5. The Bold Forest Park AAP (adopted July 2017) states that:

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

-
- 5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11
-

- 5.2. The AAP recognises that *"There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."*

- However, these properties surround and/or are part of GBP_074/HA4.
 - Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
 - The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
 - The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist. 12
-

- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *"Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."* 13
- The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *"3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park..."*

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

- 6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

- 6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *"...has a strong boundary to the east ..."* 14
"...includes old coal mining buildings..." "...and a new development..."

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer's side of the footpath, there is a ditch.
-

- The derelict coal mining buildings (an eyesore that had been used by light industry for several years before being abandoned) were demolished in March 2015 to make way for the new development referred to in the reports – that of French Fields. The first foundations were laid in the second half of 2015.
They do not detract from the openness of the Green Belt.
- The council's reports imply that the new development was an extra new build on green-field land – not reuse of the brownfield site. In fact planning was refused for the application to develop the green-field half of the owner's land.
- The new development (French Fields) is one of the five national case studies as part of the government's home building fund.
<https://www.gov.uk/government/publications/home-building-fund-developer-case-studies>

6.3. The community that is directly affected by the removal of HA4 from the Green Belt – and its subsequent development – is predominantly rural, bounded by rural land, industry and a few residential areas that are classed as part of one of the most deprived areas in the UK. The visiting public who have expectations from the Bold Forest Park are also significantly affected. Thus the number of respondents and representations will be low.

6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.

6.3.2. At least one large property developer has procured a part of the land within HA4 already and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. The NPPF encourages the active engagement of such developers in such a way – also with agreements in principle.

6.3.3. This seems to make the process unreasonable and unfair.

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016.

2. Draft Green Belt Review (GBR) 2016:

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from 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 GBR scored each parcel against the Level of Significance of its Green Belt function for purposes 1, 2 and 3 only at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are “... *not necessarily inappropriate or irrelevant*” (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

Confusing and inaccurate identification:

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).
2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, **thus giving rise to it remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps, is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has concluded (as have many councils' LAPs) that the aging population will shift housing needs from family accommodation to more care homes and easily accessible housing for small or single person households. The majority of the land in Location 21/HS03 would not be suitable for development for this type of housing based on accessibility alone.

It is also difficult to justify removing the protection of Green Belt status now for potential future housing needs where so many of the socio-economic dependencies are in flux due to the effects of the wider political environment.

3.3 Meeting the requirements for Sustainability and/or Suitability for Development:

The NPPF requires that land identified for removal from the Green Belt is capable of being developed. There are numerous reasons that indicate Location 21/HS03 does not meet these requirements.

3.3.1 Protection against climate change/flood risk:

1. Much of the land within Location 21/HS03 is intersected with drains, small ponds and sinks (St. Helens Strategic Flood Risk Assessment (SFRA) 2014), most especially the land to the west of the bridleways SN| |311 and SN| |312, which bisect the location from north west to south east .
2. This has a significant impact on any development as increased hard landscaping would increase flood risk for existing properties and road networks that surround it as well as affecting new.
3. The level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP) would make development untenable.
4. Even though the SFRA identified multiple areas within Location 21/HS03 as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels in Location 21 in the GBR.

3.3.2 Ecology, Habitat and Biodiversity:

1. **Hedgerows** – including part of the old Parish boundary on SN| |307 – are precious resources and should be preserved and enhanced to encourage biodiversity. The western portion of Location 21/HS03 retains many of its hedgerows and the French Fields development has enhanced this network by planting new native hedging around its perimeter.
2. **LWS_108**: No case has been made to remove LWS_108 from the Green Belt, nor should it be, as it cannot be classed as development land for flood risk and ecological reasons.
3. Removing HS03 from the Green Belt would result in **LWS_108** becoming isolated, which is not a good outcome. It is suggested that not only does retaining the Green Belt at Location 21/HS03 creates a green corridor to the LWS from Clock Face Country Park, but also enhances its viability.
4. **Protecting UK Priority Species and Habitats**: During 2016, several breeding pairs of skylarks (*Alauda arvensis*) were witnessed in GBS_051. In addition, lapwings (*Vanellus vanellus*) were witnessed as nesting in GBS_120. Both of these are protected UK Priority Species.

5. **The NBN Gateway** shows that corn bunting (*Emberiza calandra*), skylark, lapwing, brown hare (*Lepus europaeus*) and great crested newt (*Triturus cristatus*) have been recorded in the vicinity of Location 21/HS03. It is fair to assume these UK Priority Species could be encouraged to flourish with proper management of the sites within Location 21/HS03. There are many records of urban birds in nearby Clock Face and three species of bat in the Country Park area.
6. There is no evidence of **Phase 1 Habitat survey data** beyond 2001 being used to assess the ecology within the whole LAP. As much has changed since then, it would be sensible to have these carried out on the parcels in Location 21. The habitats and findings to date would indicate that several UK Priority Species could be present.
7. Mitigation techniques for dealing with UK Priority Species and Habitats found, would again render development of the land for much of Location 21/HS03 as untenable, at the very least to the west of the bisecting bridleways.
8. From these findings alone, it could be argued that, at the very least, the area of Location 21/HS03 to the west of the bisecting bridleways should be managed as part of a mosaic habitat, providing habitats suitable for Priority Species (including undisturbed land) and linking across to the rest of the Green Belt. Extending the Bold Forest Park woodland by planting trees in [parts of] GBS_051 and/or GBS_120 could also be valid approach. This would give a belt of woodland across from the Country Park to the woodland in LWS_108. Any of these solutions allow a connecting green corridor to and from Clock Face Country Park.
9. This area is part of the Bold Forest Park and Mersey Forest initiatives and the Council has obligations to those.

3.3.3 Access to open spaces:

1. Location 21/HS03 is bisected south west to north east by the main footpath running along the parish boundary SN| |308; has several other footpaths linking to this, SN| |307, SN| |314, SN| |315 and SN| |316; and bridleways that bisect the site from north west to south east, SN| |311 and SN| |312. These public rights of way give access to each of the surrounding settlements, to the Clock Face Country Park and wider countryside without needing to use the car. This is a key strategic aim in the LAP.
2. Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by this open countryside. It helps to create the ambiance of tranquillity before visitors enter the Park.

3.3.4 Other significant factors:

1. If Location 21/HS03 is removed from the Green Belt, it will amalgamate several settlements: Clock Face, Sutton Leach, Sutton, New Bold, Bold and Abbeyfield. This contravenes Purpose 2 of the Green belt Review.
2. The rural infrastructure (rural roads; Green Belt border to one side, intermittent housing on the other; lack of public transport, power and water) in the Gorsey Lane vicinity means it is not able to cope with additional population or traffic needs if any development for Location 21/HS103 is put forward.
3. The double line of electricity pylons running along the north western border of Location 21/HS03 will require space around them for maintenance access. They also influence the viability of development land around them.
4. As this is the area with heaviest pollution (noise and air quality, mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4. Conclusion/alternatives:

4.1 Option 1

The area identified as Location 21 in the GBR (with the possible exception of the area identified as HA6 in the LAP) should be reviewed as a whole (preferred option and stated as such at stage 4 of the GBR) **but absolutely should not be removed from Green Belt status, for the reasons defined above.** This would mitigate, to some extent, the removal of allocated employment land identified as EA1 (Appendix 15, LAP), and proposed safeguarded employment land identified as ES-01 and ES-02 (Appendix 16, LAP), from the south eastern area of the St Helen's Green Belt bordering the M62. This was identified as a necessary strategic requirement in the Employment Needs Study 2015 and the AECOM Local Plan Economic Evidence Base Paper (2015).

Much of the new housing allocation predictions are through expectations of housing requirements from the new employment. However, as the main allocation in question is at the south eastern edge of the Green Belt, and is along the M62 corridor on the very edge of the Warrington boundary (actually increasing sprawl), it is highly likely that much of the housing demand will be outside the St Helens jurisdiction.

A disproportionate amount of land is proposed to be removed from Green Belt in the southern area as opposed to other areas of the St Helens Green Belt, despite that going against the Bold Forest Park AAP and the Mersey Forest initiative. This area is integral to these initiatives, which the LAP states will not be affected. This will have a greatly detrimental impact on the landscape character of the area. In addition, the AAP makes recommendations to improve this area.

Removal of these areas of Green Belt significantly reduces the strategic gap between large towns of St Helens and Warrington.

Once these sites are removed from Green Belt, they will not be returned to it - so beyond 2034 they will not be protected. This is a dangerous proposition for such important land on a statistical projection rather than facts.

4.2 Option 2

As half of the parcel of land identified as GBS_119 in the GBR has been designated for removal from the Green Belt with immediate effect (HA6 in Appendix 11 of the LAP), and if there is a real perceived need for safeguarded housing allocation land AT THIS TIME, notwithstanding the other considerations, then an alternative compromise option could be considered.

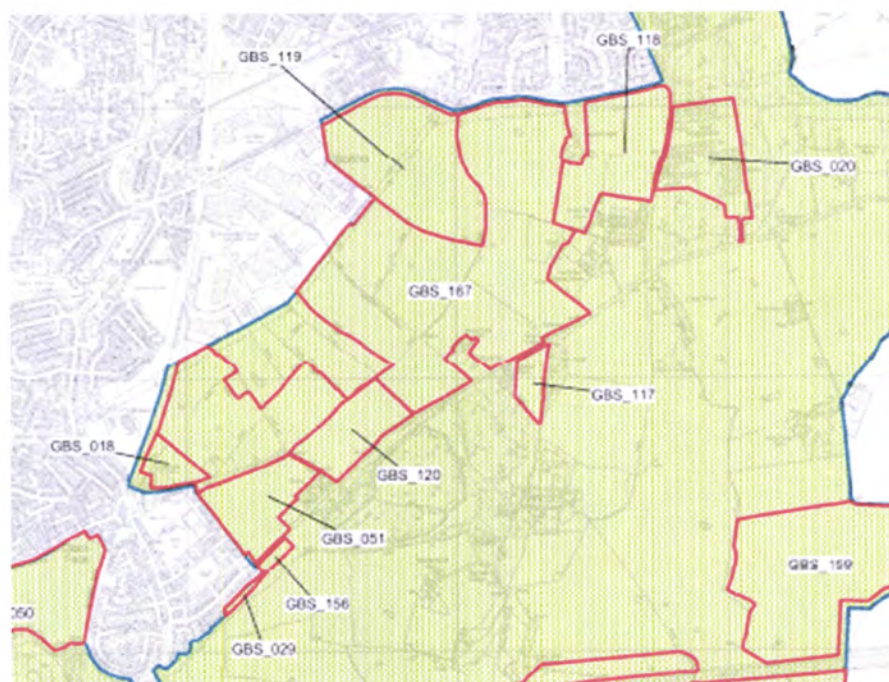
Parcels GBS_118, the remaining half of GBS_119 and the most north easterly parcel of GBS_162 in Location 21 could be examined independently as to their viability for development. If viable, these parcels could then be removed from the Green Belt into Safeguarded land, **leaving the remaining land within the Green Belt.**

This approach could be justified as:

1. There is a distinct and identifiable boundary for these parcels together - Reginald Road Industrial estate; B5204; Neills Road; footpath SN| |315 and the drain edging the south of GBS_119.
2. These parcels are close to all required sustainable infrastructure (rail, road networks, power and water).
3. Easy access to public transport.

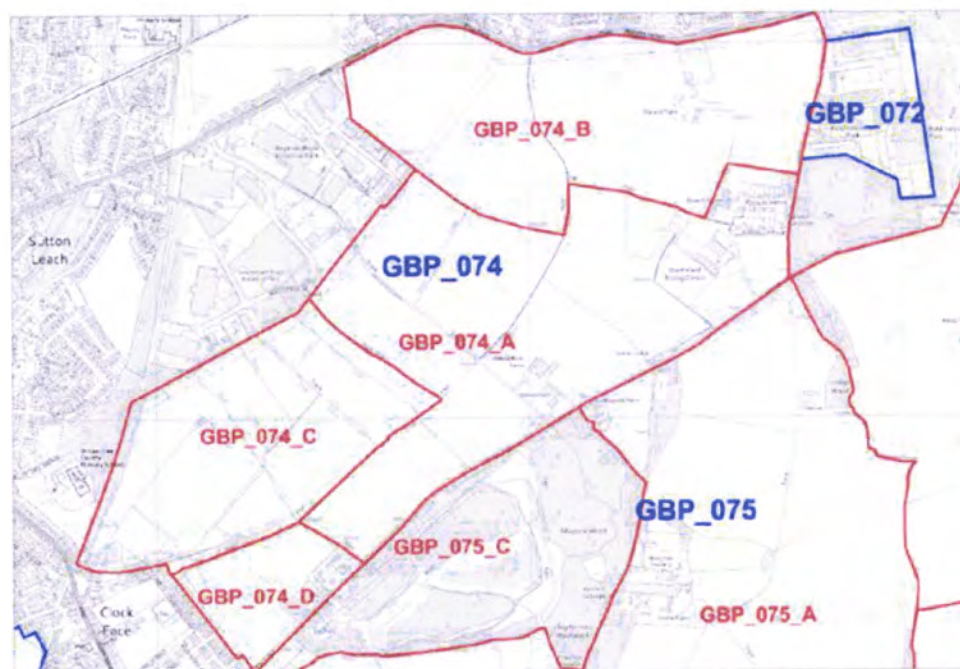
4. These parcels directly abut the B5204 and have no buildings close to the road on that boundary. Thus road networks are in place to deal with the volume of new traffic and can easily be adapted or extended to provide new access points to these land parcels.
5. Much less impact on combining settlements as fewer affected;
6. Many fewer watercourses, thus not as great, and therefore more manageable, impact on the ecology, climate change control and flood risk.
7. Retains a clear and simple boundary for the Green Belt and would not be classed as sprawl.
8. Retains much of the land to use for enhancing the landscape and environment, allowing the Council to meet many of their obligations in the Bold Forest Park AAP.
9. Retains the open landscape and green infrastructure, providing easy access between communities by existing footpaths and bridleways.
10. Addresses the potential isolation of LWS_108 and realistically retains it in the Green Belt.
11. Addresses many of the concerns identified in Option 1.

Appendix 1 – Maps of land parcels label changes between the 2016 proposals and the 2019 submission draft - to assist in the reading of this report



Above -
Detailed land parcels and sub-parcels in Location 21 – from promoted sites map 2016

And below:
Detailed land parcels and sub-parcels for GBP_074 from Page 345 of the Green Belt Review 2018



A report on the findings of a Partial Phase 1 habitat survey and three bat transects

for
LAND PARCEL GBP_74/HA4:
In the Green Belt Review 2018 and
The St Helens Local Plan 2020-2035 respectively

May 2019

Version history:

V1 Submitted May 2019

Author: Glenys McBain, BSc (Hons)

1 Executive summary

Many local residents are concerned that the council has decided to remove several parcels of land from the Green Belt, with the consequential loss of habitats and priority species, and of their own open space for wellbeing and recreational purposes.

In addition, the allocation of the land parcel covered in this report to housing with immediate effect has caused greater concern in a wider sense as to its appropriateness (and at such levels) in the locality.

When records were sought to identify land use and species present, it was discovered that many records are quite old. It was felt that up to date information was required to ensure accuracy of reporting.

Whilst this was a limited phase 1 survey, its findings show that:

- The green space is highly valued and well used by the local populace for its open space and landscape, its recreational and health use. It is a conduit between “villages” and other recreational spaces, and for walking, getting close to nature, dog walking and horse riding in their own right.
- Arable farming forms a significant portion of the 164 hectares or so of the land parcel (approximately 55%). Approximately 30% is permanent grassland (grazing land in the equestrian businesses, neutral grassland in the LWS, and some haylage), with the remainder as other habitats (woodland, hedge, ditches, ponds).
- The mosaic habitats of HA4 provide a significant green connection between Local Wildlife Sites (LWS), Local Nature Reserves (LNR) and other “green” areas, thus is of significant value to wildlife.
- HA4 is a commuting and foraging area for bats and raptors. Common Pipistrelle (*Pipistrellus pipistrellus*); Soprano Pipistrelle (*Pipistrellus pygmaeus*); Noctule (*Nyctalus noctula*); Buzzard (*Buteo buteo*) and Kestrel (*Falco tinnunculus*) were observed, although not in significant numbers. This could have been due to the exceptionally cold conditions on the survey dates. A hunting owl was also heard, but could not be definitively identified.
- Key Priority Species of Farmland birds are present and breeding in significant numbers over the whole site, Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*) and Snipe (*Gallinago gallinago*) in particular.
- The Regionally important species (North West Biodiversity Audit) English Comfrey (*Symphytum officinale*) is present scattered across the land parcel.
- The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds surrounded by mature deciduous trees. All the ditches observed had some standing water present.
- On a negative note, the western edge of GBP_074/HA4 is bounded by a disused railway line which is dominated by significant stands of Japanese Knotweed (*Fallopia japonica*) – many of which touch the boundary itself.
- Some fly tipping was observed to the north of the LWS and the boundary of Reginald Road/the industrial estate.

In summary then, this land parcel plays a significant role in the biodiversity of the area, the openness of the landscape and the health of its local population. Its loss would be significant.

2 Introduction to the surveys

In the eight week period between 31/03/2019 and 13/05/2019, a partial phase 1 habitat survey was undertaken on the land parcel known as HA4 in the St Helen’s Local Plan 2020-2035 and GBP_74 in the Green Belt Review 2018.

The purpose of the report was to record the current land use and species found in the land parcel as the council is proposing to remove this whole parcel from the Green Belt. Many existing records for this area are quite old, and it is felt that an up to date record is useful and necessary, especially as it pertains to the Bold Forest Park AAP (approved July 2017).

There is much concern within the local population that the character of the landscape will change to the detriment of their outlook, their mental health and their access to open space. In addition, many are concerned about the loss of wildlife and the effects on the environment that would result from the land use being changed to housing.

3 Methodology

3.1 Habitat surveys

Surveys were undertaken on the 30/03/2019, 08/04/2019, 20/04/2019, 07/05/2019 and 09/05/2019: to observe and record habitats and species from public rights of way (accessed from different locations).

Observations were collated, a list of species found created, a map created to show the habitats/land use within the land parcel and key biodiversity findings and observations noted.

Records will be submitted to the Merseyside Bio Bank project.

In addition, the surveys are to observe the existing public rights of way and their current use; negative impacts of invasive species and evidence of fly tipping.

3.2 Bat transect surveys

Three transect surveys were undertaken on the 30/03/2019, 21/04/2019 and 06/05/2019.

Data was collected and recorded using a variety of devices. The surveys were completed in line with the Bat Conservation Trust Good Practice Guidelines (Collins 2016).

Records will be submitted to the Merseyside Bio Bank project.

3.3 Limitations

Due to lack of time and access, the surveys were conducted by trained volunteers from public access footpaths that run through and across the land parcel, as well as observations from the surrounding roads and the disused railway line. Hence only partial data, though extensive, was able to be collected.

Due to lack of access, the citation and map for LWS_108 from 2016 (Merseyside Environmental Advisory Service) have been attached as complementary evidence to that collected during the surveys. *Where observation was not possible, their classification has been used to complete the habitat map.*

The site shows several habitat features that make it suitable for a range of mammals, reptiles and amphibians, including Water Vole (*Arvicola amphibius*) and Great Crested Newt (*Triturus cristatus*) that have previously been recorded here. This survey did not cover those aspects.

4 Findings

4.1 Main habitat classifications and findings;

The table in Appendix 1 shows the list of species found during the surveys. The maps in Appendix 3 show: the main findings for the habitat types observed during the surveys and a connectivity plan showing ecological pathways.

The field behind Gorsey Lane and Crawford Street (south west) shows overgrazing and poaching of the (semi-improved) grassland with 9 horses present at the time of survey. There is no evidence of the field being skipped out. This being noted, the tussocks of grass and vegetation appear to support breeding Lapwing (*Vanellus vanellus*) and Skylark (*Alauda arvensis*).

Not all the fields of Tunstalls Farm (a livery stable business to the north west) were easy to see, but they all appear to be permanent (semi-improved) grassland grazed by horses. They show good management with no overgrazing evident and fields being used in rotation. The rest of this land is neutral and marshy grassland that makes up LWS_108. The LWS is covered separately in 4.4.

The section of old parish boundary between the land parcels above has mature trees (mainly Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*), with some Hawthorn (*Crataegus monogyna*), Wild Cherry (*Prunus avium*), Sycamore (*Acer pseudoplatanus*), Hazel (*Corylus avellana*) and Elder (*Sambucus nigra*). There are two sections of fenced land in the area where the footpath exits the land parcel to the west. One has a marshy character, the other more ruderal.

All of the arable fields (cereal crops this year) appear to have a 3 – 5m arable margin of grassland. High numbers of farmland bird species (see 4.2) were present in these fields, especially Skylark (*Alauda arvensis*).

As expected, the highest floral diversity was present in the field margins, ditches and woodland habitats. There are many scattered ponds over the site, the majority of which are surrounded by mature trees. All ditches had some standing water, with more ditches present than anticipated following the desk study. The intact hedgerows present on site appear to support a wide range of smaller bird species despite being species poor with Hawthorn (*Crataegus monogyna*) dominant.

Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*) continue to dominate the woodlands, although Alder (*Alnus glutinosa*) is frequent in the wet woodland at the north of the LWS.

One Regionally Important Plant Species that was found scattered across the whole land parcel was English or Common Comfrey (*Symphytum officinale*).

4.2 Key data for Farmland birds

The table in Appendix 1 shows the findings for the bird species observed during the surveys. Several breeding pairs of key farmland birds were observed, the following being of particular import:

Taxon name	Common Name	Notes
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs especially on the arable fields.
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs especially on the grassland.

4.3 Key data for Bats

The following table and survey maps in Appendix 2 show the dates and locations for the bat species recorded during the transect surveys.

Taxon name	Common Name	Notes
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences
<i>Nyctalus noctula</i>	Noctule	Single occurrence

The first transect was abandoned within 30 minutes as the temperature dropped to 2°C and would not have given valid data. Even so, the sightings were of the same species and in the same locations as in the first part of the subsequent transects – and transect three as a whole.

The bats showed in smaller numbers than expected but this could have been due to the unusually cold evenings this spring.

4.4 Local Wildlife Site (LWS_108)

Observations were made from the footpaths at the south and east, thus significant areas could not be observed even with binoculars due to the trees and hedges in the interior.

The citation and map from 2016 (Merseyside Environmental Advisory Services through Merseyside Bio-Bank Services) are included as Appendix 5 to help remedy this.

There was no management plan with the citation but it was noted that the species rich eastern field was showing significant succession growth (by Goat Willow (*Salix caprea*) in particular) and this will need to be controlled to keep the site's main BAP habitats as neutral grassland/marshy grassland.

The minimal horse grazing on other parts of the site appears to be working well.

4.5 Other important observations

All of the public footpaths through and across the land parcel show evidence of high usage by pedestrians - dog walkers in particular.

The central north/south footpath/bridleway was mown on the final visit, presumably to improve access and this is helpful.

The whole site has a pleasing open aspect with views across to Winter Hill.

The disused railway line that borders the site on the north-west is dominated by large stands of Japanese Knotweed (*Fallopia japonica*), in places touching the boundary. This is a significant problem as the pathway is well used and it could spread rapidly.

There is evidence of fly tipping on the north edge of the LWS. This is not extensive, but unsightly. Measures have been taken to reduce this with signs saying "NO TIPPING" and "24 hour CCTV in place". Otherwise tipping and litter are minimal.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5 Appendices

5.1 Appendix 1

Species List in table format.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Acer campestre</i>	Field Maple	<i>Glyceria fluitans</i>	Floating Sweet Grass
<i>Acer pseudoplatanus</i>	Sycamore	<i>Hedera helix</i>	Ivy
<i>Aegopodium podagraria</i>	Ground Elder	<i>Heracleum sphondylium</i>	Hogweed
<i>Aesculus hippocastanum</i>	Horse Chestnut (seedling)	<i>Holcus lanatus</i>	Yorkshire Fog
<i>Agrostis stolonifera</i>	Creeping Bent	<i>Holcus mollis</i>	Creeping Soft Grass
<i>Ajuga reptans</i>	Bugle	<i>Hyacinthoides x massartiana</i>	Bluebells (hybrid)
<i>Alisma plantago-aquatica</i>	Alder	<i>Ilex aquifolium</i>	Holly
<i>Alisma plantago-aquatica</i>	Water Plantain	<i>Iris pseudacorus</i>	Yellow (Flag) Iris
<i>Alliaria petiolata</i>	Garlic Mustard	<i>Juncus conglomeratus</i>	Compact Rush
<i>Allium ursinum</i>	Wild Garlic (Ramsons)	<i>Juncus effusus</i>	Soft Rush
<i>Alnus glutinosa</i>	Alder	<i>Juncus inflexus</i>	Hard Rush
<i>Alopecurus pratensis</i>	Meadow Foxtail	<i>Lamium album</i>	White Dead-nettle
<i>Angelica sylvestris</i>	Angelica	<i>Lamium purpureum</i>	Red Dead-nettle
<i>Anisantha sterilis</i>	Barren Brome	<i>Lathyrus pratensis</i>	Meadow Vetchling
<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass	<i>Leucanthemum vulgare</i>	Oxeye Daisy
<i>Anthriscus sylvestris</i>	Cow Parsley	<i>Lolium perenne</i>	Rye Grass
<i>Apium nodiflorum</i>	Fool's-water-cress	<i>Lonicera periclymenum</i>	Honeysuckle
<i>Arrhenatherum elatius</i>	False Oat Grass	<i>Lotus corniculatus</i>	Birds Foot Trefoil
<i>Artemisia vulgaris</i>	Mugwort	<i>Lupinus sps</i>	Lupin (garden escape)
<i>Bellis perennis</i>	Daisy	<i>Lythrum salicaria?</i>	Purple Loosestrife?
<i>Betula pendula</i>	Silver Birch	<i>Malus sylvestris</i>	Crab Apple
<i>Brassica napus</i>	Oil-seed Rape	<i>Matricaria discoidea</i>	Pineapple weed
<i>Calystegia silvatica</i>	Large Bindweed	<i>Mentha aquatica</i>	Water Mint
<i>Cardamine flexuosa</i>	Hairy Bittercress	<i>Myosotis scorpiodes</i>	Water Forget-me-not
<i>Cardamine pratense</i>	Cuckoo flower	<i>Narcissus sps</i>	Daffodil (garden escape)
<i>Carex canescens?</i>	White Sedge?	<i>Oenanthe crocata</i>	Hemlock Water Dropwort
<i>Carex pendula</i>	Pendulous Sedge	<i>Pentaglottis sempervirens</i>	Green Alkanet
<i>Centaurea nigra</i>	Knapweed	<i>Phalaris arundinacea</i>	Reed Canary Grass
<i>Cerastium fontanum</i>	Common Mouse-ear	<i>Plantago lanceolata</i>	Ribwort Plantain
<i>Chamerion angustifolium</i>	Rosebay Willowherb	<i>Plantago major</i>	Greater Plantain
<i>Cirsium arvense</i>	Creeping Thistle	<i>Poa annua</i>	Annual Meadow Grass
<i>Cirsium palustre</i>	Marsh Thistle	<i>Poa trivialis</i>	Rough Meadow Grass
<i>Cirsium vulgare</i>	Spear Thistle	<i>Potentilla anserina</i>	Silverweed
<i>Cornus sanguinea</i>	Dogwood	<i>Potentilla reptans</i>	Creeping Cinquefoil
<i>Corylus avellana</i>	Hazel	<i>Prunus avium</i>	Wild Cherry
<i>Crataegus monogyna</i>	Hawthorn	<i>Prunus spinosa</i>	Blackthorn
<i>Dactylis glomerata</i>	Cocksfoot	<i>Pteridium aquilinum</i>	Bracken
<i>Deschampsia cespitosa</i>	Tufted Hair Grass	<i>Quercus robur</i>	Oak
<i>Deschampsia flexuosa</i>	Wavy Hairgrass	<i>Ranunculus acris</i>	Meadow Buttercup
<i>Digitalis purpurea</i>	Foxglove	<i>Ranunculus repens</i>	Creeping Buttercup
<i>Dipsacus fullonum</i>	Teasel	<i>Rosa arvensis</i>	Field Rose
<i>Dryopteris dilatata</i>	Broad Buckler Fern	<i>Rosa canina</i>	Dog Rose
<i>Dryopteris filix-mas</i>	Male Fern	<i>Rosa rugosa</i>	Hedge Rose (garden escape)
<i>Elytrigia repens</i>	Common Couch	<i>Rubus sps</i>	Bramble
<i>Epilobium hirsutum</i>	Greater Willowherb	<i>Rumex acetosa</i>	Common Sorrel
<i>Epilobium montanum</i>	Broad Leaved Willowherb	<i>Rumex crispus</i>	Curl'd Dock
<i>Equisetum arvense</i>	Field Horsetail	<i>Rumex obtusifolius</i>	Broad-Leaved Dock
<i>Equisetum fluviatile</i>	Water Horsetail	<i>Rumex sanguineus</i>	Wood Dock
<i>Euonymus europaea</i>	Spindle Tree	<i>Salix caprea</i>	Goat Willow
<i>Festuca rubra</i>	Red Fescue	<i>Salix fragilis</i>	Crack Willow
<i>Ficaria verna</i>	Celandine	<i>Sambucus nigra</i>	Elder
<i>Filipendula ulmaria</i>	Meadowsweet	<i>Scrophularia auriculata</i>	Water Figwort
<i>Fraxinus excelsior</i>	Ash	<i>Senecio jacobaea</i>	Common Ragwort
<i>Fumaria officinalis</i>	Common Fumitory	<i>Senecio vulgaris</i>	Groundsel
<i>Galium aparine</i>	Cleavers	<i>Silene dioica</i>	Red Campion
<i>Geranium pyrenaicum</i>	Hedgerow Cranes-bill (garden escape?)	<i>Sisymbrium officinale</i>	Hedge Mustard
<i>Geranium robertianum</i>	Herb Robert	<i>Solidago canadensis</i>	Goldenrod (garden escape)
<i>Geum urbanum</i>	Wood Avens	<i>Sonchus asper</i>	Prickly Sow Thistle

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Sorbus aucuparia</i>	Rowan	<i>Tussilago farfara</i>	Coltsfoot
<i>Stellaria holostea</i>	Greater Stitchwort	<i>Typha latifolia</i>	Reed Mace
<i>Stellaria media</i>	Chickweed	<i>Urtica dioica</i>	Common Nettle
<i>Symphytum officinale</i>	Common Comfrey	<i>Veronica polita</i>	Grey Field Speedwell
<i>Symphytum x uplandicum</i>	Russian Comfrey	<i>Viburnum opulus</i>	Guelder Rose
<i>Taraxacum officinale</i>	Dandelion	<i>Vicia cracca</i>	Tufted Vetch
<i>Trifolium dubium</i>	Lesser Trefoil	<i>Vicia hirsuta</i>	Hairy Tare
<i>Trifolium pratense</i>	Red Clover	<i>Vicia sativa</i>	Common Vetch
<i>Trifolium repens</i>	White Clover	<i>Vicia sepium</i>	Bush Vetch
<i>Tripleurospermum inodorum</i>	Scentless Mayweed		

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aegithalos caudatus</i>	Long-tailed tit	
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs
<i>Anas platyrhynchos</i>	Mallard	(pair)
<i>Buteo buteo</i>	Buzzard	
<i>Carduelis carduelis</i>	Goldfinch	flock of 8
<i>Columba palumbus</i>	Wood Pigeon	several
<i>Corvus corone</i>	Carrion Crow	
<i>Cyanistes caeruleus</i>	Blue tit	
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Erithacus rubecula</i>	Robin	
<i>Falco tinnunculus</i>	Kestrel	
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Hirundo rustica</i>	Swallow	
<i>Parus major</i>	Great tit	
<i>Passer domesticus</i>	House Sparrow	several -including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Periparus ater</i>	Coal tit	
<i>Phasianus colchicus</i>	Pheasant	
<i>Phylloscopus collybita</i>	ChiffChaff	(several)
<i>Pica pica</i>	Magpie	
<i>Sturnus vulgaris</i>	Starling	
<i>Sylvia communis</i>	Whitethroat	
<i>Troglodytes troglodytes</i>	Wren	
<i>Turdus merula</i>	Blackbird	several
<i>Turdus viscivorus</i>	Mistle Thrush	
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aglais io</i>	Peacock Butterfly	
<i>Anthocharis cardamines</i>	Orange Tip Butterfly	
<i>Bombus lapidarius</i>	Red-tailed Bumble	
<i>Bombus lucorum</i>	White tailed Bumble Bee	
<i>Coccinella magnifica</i>	Ladybird	
<i>Pararge aegeria</i>	Speckled Wood Butterfly	
<i>Pieris rapae</i>	Small White Butterfly	

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Nyctalus noctula</i>	Noctule	Single occurrence
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Oryctolagus cuniculus</i>	Rabbit	

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.2 Appendix 2

Map of GBP_74/HA4 showing transect route and bats recorded

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Results of the two successful bat transects:



Mapping of the results from the bat transect number 2 on 21/04/2019



*Mapping of the results from the bat transect 06/05/2019
showing Common Pipistrelle (Pipistrellus pipistrellus) in red and Soprano Pipistrelle (Pipistrellus pygmaeus) in orange*

Note: The results of the last transect (06/05/2019) are very similar to the findings during the abandoned transect (30/03/2019) where the results were not recorded.

In both cases the temperature was very low (2°C in the abandoned; down to 7°C in the last).

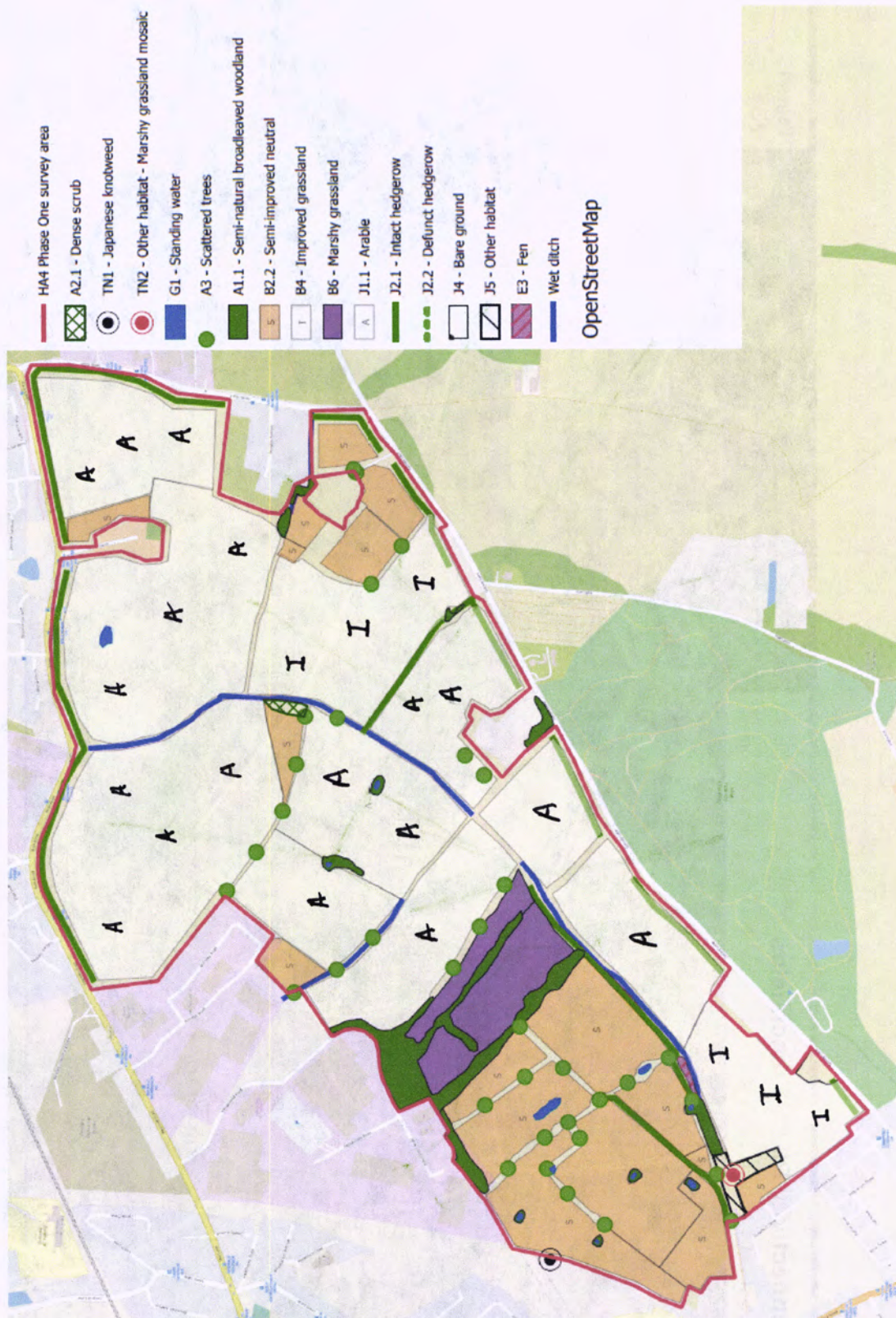
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.3 Appendix 3

Phase 1 Habitat Map of GBP_74/HA4
And
Connectivity Plan for GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.4 Appendix 4

Photos taken during Phase 1 survey of GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



View south across Tunstalls Farm from disused railway line



View north across Tunstalls Farm from old parish boundary



Looking towards Clock Face Country Park from old parish boundary



One of many ponds on site



Looking north across the LWS grassland



Eastern field of LWS

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Looking north from LWS across arable fields



Looking north east across arable fields from central footpath



Stands of Japanese Knotweed at the western boundary



Horses grazing at Tunstalls Farm



View north east over arable land



View north over arable fields

5.5 Appendix 5

The Citation for LWS_108 Tunstalls Farm (2016)
and
The Map for LWS_108 Tunstalls Farm (2016)

*(supplied by Merseyside Environmental Advisory Service
through Merseyside Bio-Bank Services)*

Site Name: Tunstall's Farm (formerly Field north of Gorsey Lane)

Site Area: 15.05 hectares **National Grid Reference:** SJ534921

Date of Designation: April 1994 (part) **District:** St. Helens

Date of Last Revision: September 2016 **Local Wildlife Site Number:** 108

CITATION: A group of small agricultural fields with an extensive ditch and hedgerow network. The field is now under Environmental Stewardship and is developing into a species rich meadow including, regionally and locally important species. The ponds and ditches on site provide habitat for water vole and great crested newts.

APPRAISAL: This site has been evaluated against the guidelines approved by the Council for selection of Local Wildlife Sites. The site's evaluation against the guidelines is set out below.

Guideline		Comment
HABITATS		
H1; H2; H3; H4.	Rarity Diversity Nearness Isolation	1 priority BAP habitat; 3 regionally important habitats. 11 habitats recorded. 31 sites within 1Km. --
PLANTS		
SP1; SP2; SP3; SP4.	Rarity Diversity Naturalness Nationally Rare	1 regionally important species; 1 locally rare species. Total of 74 plant species. 95.95% of the plants are native to the borough. Colonisation has been aided by man and the site has been physically altered. --
ANIMALS		
General SP5; Birds B1; B2; B3; B4; B5.	Rare/priority Non-breeding population Breeding population Regional rare/scare Breeding assemblage Assemblage, breeding, wintering, passage.	-- -- -- -- -- --
Dragonflies Od1. Od2. Butterflies Bf1; Bf2.	Breeding Regional rare/scarce Region rare breeding Breeding assemblage	-- -- -- --
Amphibians A1; A2. Reptiles R1; R2; Bats Bat1; Bat2.	Rarity Exceptional populations Population of native species. Exceptional population Roost Assemblage	Guideline met – Great crested newt -- -- -- --
Mammals Mam1.	Breeding	Guideline met – Water vole.

SUMMARY: The combination of these factors has led to this site being identified as a Local Wildlife Site.

NOTE: Validated data from 1981 to September 2016 have been used in this assessment. Other data may become available to support this designation.

Status of species of nature conservation importance

Habitats

1 Priority BAP habitat	Unimproved neutral grassland
3 Regionally important habitats (North West Biodiversity Audit)	Unimproved neutral grassland Marshy grassland Standing water

Plants

1 Regionally important species (North West Biodiversity Audit)	Common comfrey (<i>Symphytum officinale</i>)
1 Locally rare species	Fen Bedstraw (<i>Galium uliginosum</i>)

Animals

Amphibians

1 Habitats Regulations 2010 – Schedule 2 species	Great crested newt (<i>Triturus cristatus</i>)
1 Wildlife and Countryside Act – Schedule 5 species	

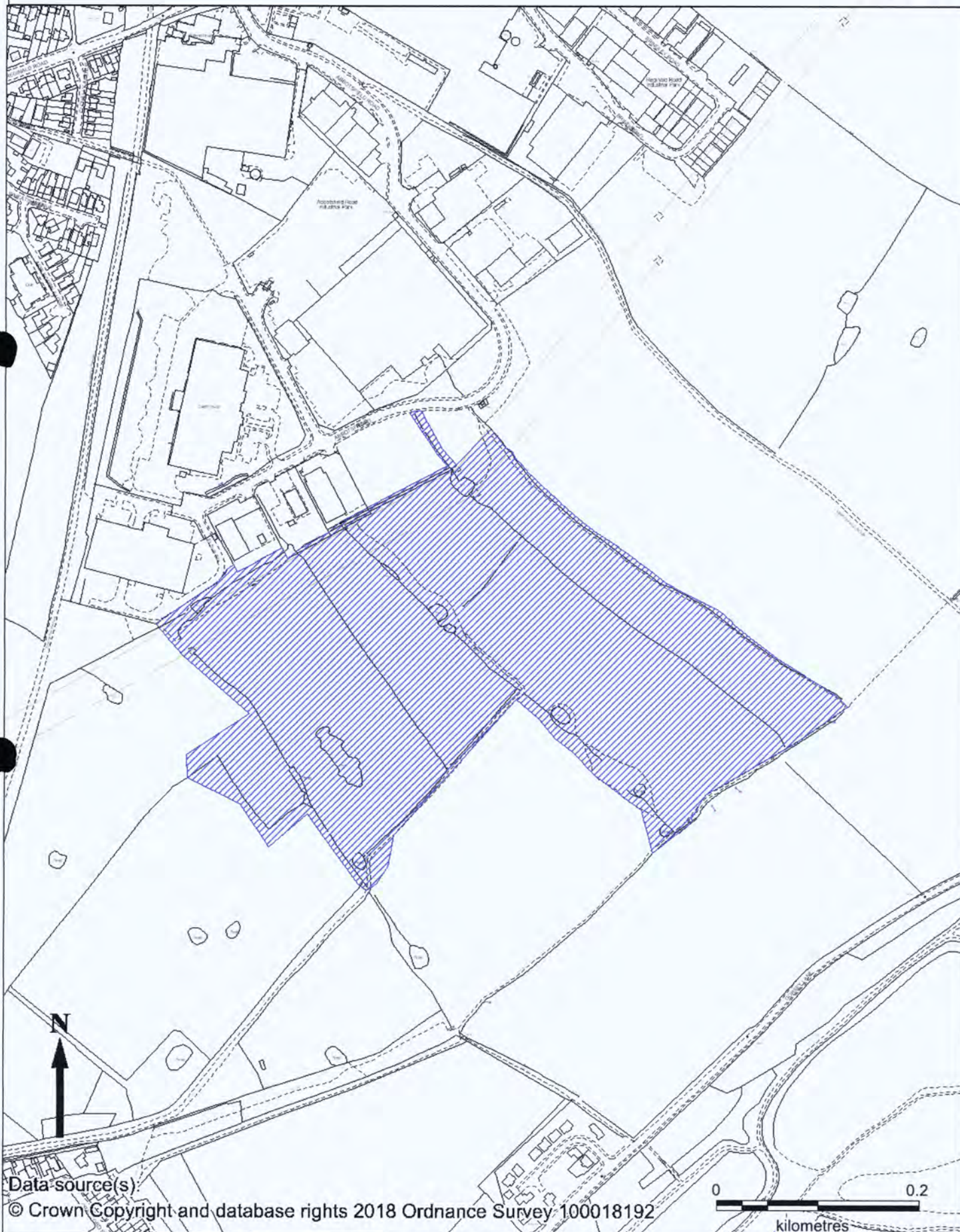
Mammals

1 Wildlife and Countryside Act – Schedule 5 species	Water vole (<i>Arvicola terrestris</i>)
--	---

Local Wildlife Site 108
Tunstalls Farm
Scale: 1:2500



Merseyside
Environmental
Advisory Service



Data source(s)

© Crown Copyright and database rights 2018 Ordnance Survey 100018192

0 0.2
kilometres

RO0661



St. Helens
Council

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

Ref: LPSD

3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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>DILYS</u>	First name:
Last Name: <u>GOLDEN</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>178 RAINHILL RD</u> <u>RAINHILL</u> <u>MERSEYSIDE</u>	Address:
Postcode: <u>L35 4PL</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

10/3/2019

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.

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	LP A 36	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

Does not take notice of residents who know the area well & already experience the problems of more housing.

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

- Rainhill Rd is a B road which can't support current level of traffic.
 - Increased traffic will affect air pollution & pedestrian safety.
 - The natural Green Belt buffer that separates the present areas would create a continuous area of urban dwellings, thus destroying the purpose of Green Belt.
 - Lack of school places, hospital & A&E facilities, doctors & dental surgeries.
 - High water-table in the area would affect drainage & flooding from local brooks & natural soak-aways.
 - Access to water pipes from Wales across Golf Course would be adversely affected. Golf course is a valuable leisure facility; previously hospital farm land.
 - Traffic through Village at peak times is horrendous: Longton Lane road works recently caused chaos.
 - Protected flora & fauna would be in danger.
- continue on a separate sheet if necessary

- State of shopping facilities & parking in St. Helens discourages people wanting to live near the town!

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 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:

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.**

RO0662



St Helens
Council

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**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.

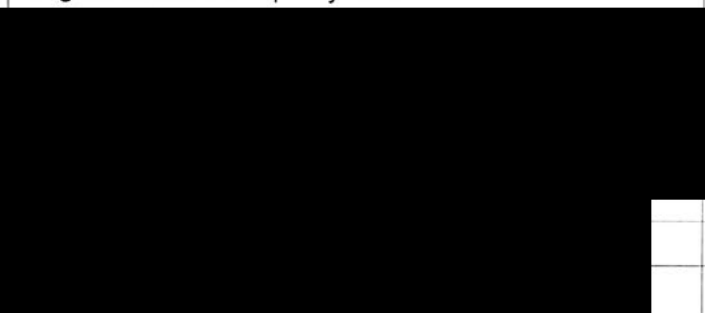
This form has two parts;

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>MRS</u>	Title:
First Name: <u>KATHARINE</u>	First name:
Last Name: <u>GOODALL</u>	Last Name:
Organisation/company: <u>N/A</u>	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

27-2-2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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 – 5:00pm)

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	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?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No 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?	X
Justified?	X
Effective?	X
Consistent with National Policy?	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

THE INCREASE OF TRAFFIC BECAUSE OF ANY MORE HOUSE BUILDING WILL BADLY AFFECT AIR POLLUTION FOR LOCAL PEOPLE.

RAINHILL ROAD IS ALREADY GRIDLOCKED
MOST DAYS OF THE WEEK NOW, SHOULD
MORE HOUSES BE BUILT IT WOULD MAKE
THE WHOLE AREA FROM ST. HELENS, THROUGH
WARRINGTON ROAD AND ON TO WHISTON AND
PRESCOT UNABLE TO MOVE MORNING AND
EVENING RUSH HOURS.

PRESENTLY THE HOUSING, ESPECIALLY A + E,
AND SCHOOLS CAN'T COPE WITH TODAY'S
POPULATION IN ST. HELENS, SO IT WILL BE
IMPOSSIBLE TO COPE WITH ANY INCREASE OF
PEOPLE IN OUR BOROUGH.

THERE IS A VERY GOOD REASON FOR HAVING A
GREEN BELT*, SO BUILDING ON IT MUST
CONTRADICT THE REASON FOR HAVING A
GREEN BELT.

* TO BUILD ON PLOT 3HS WOULD MAKE THE WHOLE AREA
ONE URBAN SPRAWL.

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 proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

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"/>	
--------------------------	--	--------------------------	--

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.

RO0663



St Helens
Council

679

**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.

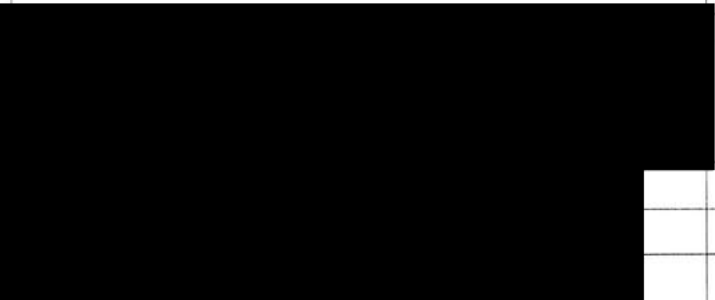
This form has two parts;

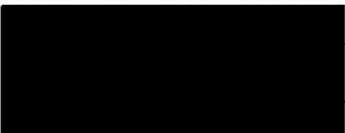
Part A – Personal Details

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: ROY	First name:
Last Name: GOODALL	Last Name:
Organisation/company: N/A	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: 27-2-2019
--	-----------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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 – 5:00pm)



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	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?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No 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?	X
Justified?	X
Effective?	X
Consistent with National Policy?	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

THE ROADS IN AND AROUND RAINHILL ARE BUSY ALL THE TIME, SO MORE HOUSES MEANS MANY MORE CARS RUINING QUALITY OF AIR, AS WELL AS CAUSING MANY MORE TRAFFIC PROBLEMS.

THE GREEN BELT SUPPORTS MANY WILD ANIMALS, BIRDS AND FLORA AS WELL AS FAUNA — WE CANNOT AFFORD TO LOSE ANY OF THESE.

I UNDERSTAND OUR DOCTORS SURGERIES AND DENTAL SURGERY ARE NO LONGER ACCEPTING ANY MORE PATIENTS AS THEY ARE FULL TO CAPACITY. ALSO OUR LOCAL SCHOOLS AND HOSPITALS WILL NOT BE ABLE TO COPE WITH ANY MORE PEOPLE.

RAINTON ROAD AND WARRINGTON ROAD, INCLUDING SURROUNDING ROADS ARE NOT ABLE TO SUPPORT THE CURRENT LEVEL OF TRAFFIC MOST TIMES OF THE DAY, SO MORE CARS ETC. WILL WORSEN TRAFFIC FLOW — IT WILL MAKE IT IMPOSSIBLE.

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 proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

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		
--	--	--

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.

RO0664



St. Helens
Council

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

Ref: LPSD

01 MAR 2018
(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.

01 MAR 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARIE	First name:
Last Name: GOODE	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	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.

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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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 LP A 05	SITE I H A	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 checked="" 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 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

- ① The pollution will be more and the traffic and infrastructure is not in place.
- ② Doctors – no appointments for 3wks.
Schools are full at the moment
Chemist Betty busy too.
- ③ Environment will be affected wildlife is nil at the moment so will be worse.
- ④ Views that we all enjoy will go.
- ⑤ Playing fields are non existent now so won't be any at all.

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE
PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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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:

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

Ref: LPSD

01 MAR 2018
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Part B - Your Representation(s)
01 MAR 2019

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: MARIE

Last Name: GOODE

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: 27/2/19

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

Would you like to be kept updated of future stages of the St 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

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Town Hall
Victoria Square
St Helens
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Telephone: **01744 676190**

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

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA OL</i>	<i>Site 145</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 <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>① The pollution will be more and the traffic and infrastructure is not in place</p> <p>② Doctors — no appointments for 3wks Schools are full now</p> <p>③ Chemist — pretty busy Environment will be affected — wildlife is nil at moment so will be worse</p> <p>④ Views that we all have enjoyed will go.</p> <p>⑤ Playing fields are non-existent now so won't be any.</p>	

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT

Please continue on a separate sheet if necessary

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

<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:

--

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.

RO0665

ELO210



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation - submitted
on behalf of BXB (Cowley Hill) Ltd
Gemma Williams

to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:38

① - Appendix
② - LPA08
③ - LPC02
④ - LPA05.1

2 Attachments



lpsd-representation-form.doc 13 03 19.pdf c.pdf pt 12 03 19 sh GW.pdf

Please see attached a completed Representation Form and letter of explanation submitted on behalf of BXB (Cowley Hill) Ltd.

Kind regards

Gemma Williams
Administrator

Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



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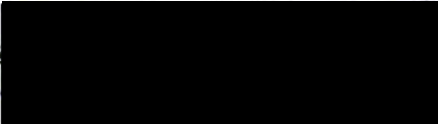
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

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	Title: Mr
First Name: Gary	First name: Peter
Last Name: Goodman	Last Name: Tooher
Organisation/company: BXB (Cowley Hill) Ltd	Organisation/company: Nexus Planning
Address:	Address: Eastgate, Castle Street, Manchester
Postcode:	Postcode: M3 4LZ



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

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 x (Via Email)

No ☐

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LPA05		Appendix 5, bullet points 2 (Green Infrastructure) and 5(B1 uses)							
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 checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

BXB (Cowley Hill) Ltd strongly supports the allocation of Cowley Hill site for residential led development. BXB (Cowley Hill) Ltd supports the Council in progressing the Local Plan. The Local Plan preparation process and the requirements of the site however necessitate BXB (Cowley Hill) Ltd commenting on the draft Local Plan to the effect that two specific elements of

Appendix 5 as they relate to Cowley Hill are unsound. Please refer to the attached letter (Nexus Planning, 13.03.2019)

Please continue on a separate sheet if necessary

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

Please refer to the attached letter (Nexus Planning 13.03.19)

Please continue on a separate sheet if necessary

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

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

--	--	--	--

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

The strategic importance of bringing forward the Cowley Hill site and BXB (Cowley Hill) Ltd's key role.

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.**



Paul Sanderson
Strategic Director of Place Services
St Helens Council
Local Plan
Town Hall, Victoria Square
St Helens, Merseyside
WA10 1HP

Manchester
Eastgate
2 Castle Street
Castlefield
Manchester M3 4LZ

nexusplanning.co.uk

E: planningpolicy@sthelens.gov.uk

13th March 2019

Dear Sir

The New St Helens Borough Council Local Plan 2020 – 2035
Submission Draft – ‘Regulation 19’ consultation
Representation submitted on behalf of BXB (Cowley Hill) Limited in relation to Cowley Hill, St Helens (6HA)

Thank you for the opportunity to comment on the submission draft of the New Local Plan. This representation is submitted on behalf of BXB (Cowley Hill) Ltd by Nexus Planning. ✓

A completed Representation Form is attached to this representation. ✓

BXB Ltd is a specialist land developer focussing on bringing forward brownfield, previously developed sites, for all types of development, including residential. ✓

BXB (Cowley Hill) Ltd has a land and promotion agreement with Pilkington plc in relation to the surplus land at Cowley Hill, Strategic Housing Site ref 6HA in the Draft Local Plan. BXB (Cowley Hill) Ltd intend to submit an application for residential-led development on the Cowley Hill site in 2019. Initial reclamation work on the site is due to commence in early 2020 as ‘permitted development’ demolition work. Subject to the appropriate approvals, this will be followed by further grounds works, site preparation, engineering works and reclamation and development later in 2020. ✓

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BXB Ltd is in principle strongly supportive of the allocation of the land at Cowley Hill for residential development. The site will contribute towards meeting a number of the Council's strategic objectives as set out in the Draft Local Plan, not least:

- meeting development needs by ensuring the efficient re-use of previously developed land (Strategic Objective 1.3);
- promoting the creation of a well-designed environment by supporting proposals for high quality development (Objective 2.1);
- improving access for all by, amongst other things, facilitating sustainable transport choices and development in accessible locations (Strategic Objective 3.1);
- delivering sustainable communities by identifying land for a sufficient number and range of new dwellings (Objective 4.1).

Notwithstanding strong in principle support, the Local Plan preparation process and BXB (Cowley Hill) Limited's position on some matters requires the submission of a representation which responds to specific points on the basis that the plan is 'unsound'. BXB (Cowley Hill) Ltd consider that these 'unsound' matters can be readily resolved through further discussions with the Local Planning Authority and minor modifications to the emerging Local Plan.

Cowley Hill – A strategic brownfield opportunity

The site is brownfield, having been previously used for industry and, in part, for the disposal of material arising from industrial processes. It was previously in use by Pilkington plc who have now identified the site as surplus to their on-going requirements in St Helens. As a brownfield site, making as much use of it 'as possible' is entirely consistent with paragraph 117 of the National Planning Policy Framework (February 2019).

Again, according to the context of the National Planning Policy Framework (NPPF) and Paragraph 67, Cowley Hill is 'available', 'suitable' and 'deliverable' and this is rightly reflected in its allocation in the draft Local Plan.

Available

The site is available for development having been declared surplus by Pilkington plc.

Suitable

The site, subject to the appropriate remediation that residential development will facilitate, is entirely suitable for new homes. It is in the heart of the St Helens urban area. The southern part of the site is only around a 0.5 mile walk from St Helens Town Centre and, thereby, access to a full range of retail, leisure, community and other facilities, as well as employment opportunities. There are a number of schools in the local area and St Helens Further Education College is in the town centre.

The wider area is predominantly residential with areas of industry (including premises to be retained by Pilkington), open space and other facilities. College Street and North Road / City Road run close to the site and are well served by local bus services linking the area to the town centre and elsewhere. St Helens Central Railway Station is in the town centre and less than a mile from the College Road access to the site. St Helens Central provides direct services to Liverpool (approximately 34 minutes travel time), Preston (34 minutes) and Wigan (18 minutes). Direct services to Manchester (29 minutes) are available at St Helens Junction Station, to the south

of the town centre. For those who need to drive, the A580 East Lancs Road is accessible to the north of the site via Washway Lane / City Road, without the need to travel through existing residential areas.

Deliverable

The site is deliverable for residential led development. BXB (Cowley Hill) Ltd has undertaken an initial technical assessment of the site. Whilst inevitably there are a number of matters to be addressed as a consequence of the site's industrial history, BXB Ltd is confident that there are no constraints that would prevent residential development on the site. This technical work has been identified a net developable area of around 35 hectares.

BXB (Cowley Hill) Ltd has discussed the site with the Local Planning Authority and intend to submit a planning application for residential led development in 2019. This will be supported by a comprehensive masterplanning approach and a phasing strategy. The application will be prepared with the benefit of stakeholder and local community consultation. As noted earlier, and subject to the necessary approvals, BXB (Cowley Hill) Ltd expect development to start on the site in 2020, following phased site preparation, engineering and remediation.

Whilst the NPPF and extant development plan provide a very positive basis upon which an application on the site can be progressed in 2019 ahead of adoption of the new Local Plan, BXB Ltd are wholly supportive in principle of the proposed allocation of the site in the Submission Draft Local Plan. However, as noted above, the draft Local Plan is considered 'unsound' on a number of specific points.

Draft Policy LPA05.1: identifies 'Strategic Housing Sites' and refers to:

'6HA: Land at Cowley Street, Cowley Hill, Town Centre'

The policy notes that any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan.

Detailed development proposals within a Strategic Housing Site are required to comply with Policy LPA08. Policy LPA08 deals with Infrastructure Delivery and Funding and developer contributions secured by legal agreement or a tariff based system such as the Community Infrastructure Levy. The policy notes that development contributions will be considered in the context of the economic viability of new development. Consideration will be given to economic viability evidence to determine the ability of the development scheme to support the required level of contributions.

A similar approach is taken to the provision of Affordable Housing in Policy LPC02, which acknowledges that provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development. The policy notes that affordable housing requirements can be relaxed where it is fully justified by an independent site-specific viability appraisal and where a reduced affordable housing provision is outweighed by the other benefits of the development.

BXB (Cowley Hill) Ltd welcome this clear and pragmatic approach. As noted earlier, BXB Ltd are confident that the Cowley Hill site can come forward for residential development. However, bringing the site forward will require significant investment in site remediation and infrastructure, amongst other things. The inevitable, additional costs of viably developing a large scale, brownfield site will need to be reflected in the extent of developer contributions and affordable housing provision, based on a robust viability appraisal. The significant additional investment in infrastructure and other works in bringing forward brownfield sites such as Cowley Hill

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should be explicitly reflected in LPA08 and LPC02. Similarly LPC02 should be reflected to take into account the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice, in an innovative way.

Appendix 5

The masterplans for each Strategic Housing Site are to address the indicative requirements set out in Appendix 5.

Appendix 5 to the Draft Plan identifies the Cowley Hill site as having a 'notional' capacity of 816 units.

The site extends to approximately 50 hectares and initial capacity testing undertaken by BXB (Cowley Hill) Ltd confirms that the site has a net developable area of 35 hectares and a capacity of around 1,000 – 1,200 new homes, subject to detailed masterplanning and housing mix.

Reflecting Policy LPA05.1, Appendix 5 identifies a series of 'indicative requirements' that are to be 'addressed'. These as drafted, are as follows:

- *Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).*
- *A Green corridor, incorporating the LWS47*, should be provided from the north around the eastern boundary of the site linking the green spaces and habitats along Rainford Brook and the wider greenway network.*
- *Measures to 'slow the flow' and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 'flood Risk and Water Management'.*
- *The development should include appropriate measures to attenuate noise from the adjacent employment use(s).*
- *The development area allows for the inclusion of 4ha of B1 employment uses (if this is not implemented this will make more land available for housing).*
- *Any development should address any contamination issues and/or other geotechnical issues affecting the site.*
- *Related to the above, site levels should be carefully considered in relation to the site layout and surrounding area.*
- *The design and layout of the development should provide for a range of house types in character areas.*
- *Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.*

*Local Wildlife Site 47

BXB (Cowley Hill) Ltd support the master planning approach to Strategic Sites including Cowley Hill and, in large part, the requirements proposed for the site. The inherent flexibility in how the 'indicative requirements' are addressed through a masterplanning process which, in the case of Cowley Hill, will inevitably have to balance a range of design, ground conditions, infrastructure, environmental and viability issues is welcomed.

However for the sake of clarity, and given the scale of the site, the need to address its' industrial legacy, as well as its future relationship with remaining industrial uses, access and other considerations, it is considered that the albeit indicative requirements set out in Appendix 5, should be amended. There indicative requirements

should clearly facilitate a flexible, innovative approach to be taken to masterplanning and the subsequent development of the site, whilst maintaining key principles. ①

In particular, BXB (Cowley Hill) Ltd consider that the 'requirements' relating to green infrastructure and employment land should be revised.

Green Infrastructure Requirements

BXB (Cowley Hill) Ltd acknowledge the need to appropriately safeguard and enhance areas of biodiversity and wildlife value. However, significant reclamation works are required to stabilise the site and create an environment appropriate for new homes. This work will be required across the site and will impact areas previously identified as having wildlife value. Similarly, the approach to creating and enhancing green infrastructure will, to make best possible use of the site, need to be integrated with approaches to screening the site from continuing industrial uses along its western edge. The appropriate approach adopted through masterplanning will also need to reflect updated ecology and other surveys. ①

It is therefore considered that the Council should seek the amendment of this 'indicative requirement' via a proposed modification as follows:

- **The green infrastructure strategy on the site should seek to maintain the ecological value of the site, balancing other masterplanning, engineering, remediation, viability and other development requirements.**
 - **The draft Local Plan is currently considered to be 'unsound' in this respect.**
- Proposed
Amend-
ment

Employment Land

Through the masterplanning process, BXB (Cowley Hill) Ltd will consider the scope for employment and other uses as part of creating a sustainable housing led development. However, market and viability issues will be a key consideration. BXB Ltd welcomed that this is reflected, to a degree, in the requirements providing the scope to use the suggested area for housing if employment does not come forward. However, in the context of facilitating a flexible, innovative approach to masterplanning, it is considered that reference should also be made to other appropriate commercial uses in this area consistent with the creation of a new residential neighbourhood. The requirement should also more clearly reflect viability considerations and the overarching objective of delivering a high quality, sustainable neighbourhood. ①

It is therefore considered that the Council should seek to amend this 'indicative requirement' via a proposed modification, as follows:

- **The development area allows for the inclusion, subject to viability and masterplanning considerations, 4ha of land for a mix of uses including appropriate retail, leisure, employment and commercial uses (if this area is not used for these uses it will make more land available for housing).**
- SUGGEST
AMEND-
MENT

The draft Local Plan is currently considered to be unsound in this respect.

BXB (Cowley Hill) Ltd acknowledge the need to provide appropriately for open space as part of a high quality residential environment. Policy LPD03, referred to in the requirements establishes open spaces standards, whilst also noting that in some cases the expansion or enhancement of off-site open space within the locality

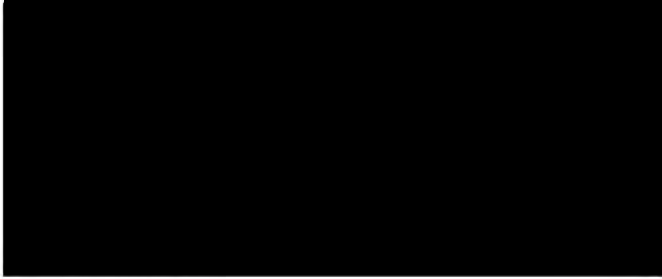
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may be more suitable. Again, the approach to open space will be considered as part of the masterplanning strategy supporting a planning application. However, it is noted at this stage that the proximity of the site to the historic and characterful Victoria Park offers a particular opportunity, through enhanced linkages and other improvements, to provide new residents access to a high quality, substantial public open space. This will be reflected in the masterplan approach and should be reflected in the application of relevant open space policies.

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I trust these comments are helpful and can be reflected as appropriate in the proposed modifications. Please let me know if my client can assist further in supporting the authority in the preparation of the Local Plan.

Yours faithfully



Peter Tooher
Director

RO0666



{In Archive} The Local Plan

john

to:

planningpolicy

20/02/2019 15:39



8/15 LPA06

With regard to the local plan and in particular to remove the land east of Houghtons Lane from the greenbelt:

I think that the criteria used to make decisions are quite thorough and well thought out. However, I do think that local (low food miles) land which is not only suitable for food production but which is currently being used for food production (agricultural) should be considered more strongly and as a separate criterion.

The future of St. Helens and its inhabitants are inseparable from the future of the UK. Food production is an issue which is very likely to grow in importance as populations rise and political world trade issues remain important. Local (low food miles) agricultural land, in my opinion, should be considered as very important. Once it is destroyed (removed from food production for building), it is unlikely that it can ever (in the foreseeable future) be reclaimed as food needs become more dominant.

It is clearly difficult to look into the future, as local planning must do, but it seems a very safe bet to anticipate that agricultural food production will grow in importance. Decisions made now might benefit future generations if food production becomes an important issue, even locally and now.

There are other reasons with respect to the particular local area I have raised, but the general consideration of leaving healthy agricultural food production land within green belt seems to be a compelling one.

Thank you for your time.

John.

*** Dr. John L. Gordon



RO0667

① - LPA05 ② - Para 1-7.2 DTC
③ - LPA06, 8HS ④ - LPA02

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EFO015



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

wendy gore

to:

planningpolicy@sthelens.gov.uk

10/03/2019 19:05



1 Attachment



lpsd-representation-form - WG.doc

Dear Sir/Madam,

Please find attached my completed comment form.

Yours faithfully

Wendy Gore



St. Helens
Council

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

Ref: 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 Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Wendy	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486	

this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Catchdale Moss Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately two of the accidents in the last year involved two fatalities one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goe ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

there is nowhere to build them within the area of 8HS.

3

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

The Plan is not effective.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

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

No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
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1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

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

RO0668

① - LPA05 ② - Para 1.7.2 DTC
③ - LPA06, 845 ④ - LPA02

Page 1 of 1
EFO028



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

John Gore

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:59



1 Attachment



2019 03 11 lpsd-representation-form - JG.doc

Dear Sir/Madam,

Please find attached my completed comments form.

Yours faithfully,

John Gore



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	
------------	--	-------	--

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

Please tick as appropriate

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

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	
There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486	

this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately, two of the accidents in the last year involved two fatalities, one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goes ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

there is nowhere to build them within the area of 8HS.

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

The Plan is not effective.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

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

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

100

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

RO0669

143

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)

Title: MR

First Name: BARRY

Last Name: GORE

Organisation/company: HOUSEHOLD

Address: 9 Manor Close

GARSWOOD

NR WIGAN

Postcode: WN4 0SB

Tel No: [REDACTED]

Mobile No: [REDACTED]

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

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**

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	IHA								
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 YET</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 not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT SUBSTANTIATED - THIS COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. NH&RG 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.</p> <p>THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF GREEN BELT. HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTOR'S, BUS ROUTES ETC THE ACCESS TO THE SITE ON EITHER BILLINGE RD OR GARSNOOD RD WOULD BE INADEQUATE. ANY NECESSARY HIGHWAYS WORKS MUST BE FUNDED BY THE DEVELOPER AND <u>NOT</u> COUNCIL TAX PAYERS.</p>

THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING 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.

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT

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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St. Helens
Council

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

Ref: LPSP

01 MAR 2019

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(we will correspond via your agent)

Title: MR
First Name: BARRY
Last Name: GORE
Organisation/company: HOUSE HOLDER
Address: 9 MAJOR CLOSE
GARBWOOD
NR. LIGAN
Postcode: WN4 0SB
Tel No: [REDACTED]
Mobile No: [REDACTED]
Email: [REDACTED]

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: [REDACTED] 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

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St.Helens Council
Town Hall
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WA10 1HP**

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	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 <i>Doesn't know for</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 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><i>Box 6 - Reasons</i></p> <p><i>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 Green Belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using a Green Belt fails to encourage this. The release of Green Belt will cause significant harm to the purposes of Green Belt. Housing in this area isn't sustainable because of the lack of school places, doctors, bus route etc. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighboring authorities.</i></p> <p><i>Box 7 - Modifications - Delete this land from the proposed removal from the Green Belt.</i></p> <p><i>Box 8 - No.</i></p>	

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM
THE GREEN BELT.

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.

RO0670

Representor Details

Web Reference Number	WF0440
Type of Submission	Web submission
Full Name	MS CHRISTINE GORMAN
Organisation	
Address	16 MOSS LANE WINDLE ST.HELENS 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	8HS
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It fails to recognise the green belt. It fails to recognise the need to use brown field sites. It fails to recognise the additional pollution caused by this development. It fails to recognise the additional strain on already stretched services of utilities, transport, traffic, GP surgeries, schools, and pollution controls. It fails everyone.

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

Stop building on green belt. Stop polluting an already over populated and polluted area. Use the numerous brown field sites which are crying out for re-development. Once the green belt is gone it is gone forever. We need our agricultural land for agriculture and well being. We don't need more pollution from noise, and emissions. Stop it now.

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

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

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

Response Date	2/26/2019 10:43:25 AM
---------------	-----------------------

RO0671



St. Helens
Council

672

**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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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: LESLEY	First name:
Last Name: GOUNIE	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 2 FAIRLIE DRIVE RAINHILL MERSEYSIDE	Address:
Postcode: L35 0PW	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

11th March 2019

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

Yes ☒ (Via Email)

No ☐

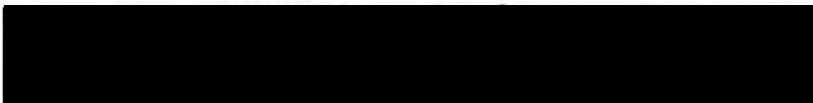
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

1. NAME MR F, J HEYES PRINT NAME HEYES
ADDRESS 4, FAIRLIE DRIVE, RAINHILL
PRESCOT M/SIDE L35 0PW DATE 12/3/19.



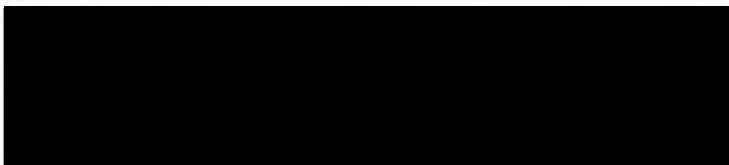
I give explicit permission for my name to be used in this response.

2. NAME L. J. Gannon PRINT NAME L. J. GANNON
ADDRESS 7 BIRNAM DRIVE, RAINHILL
PRESCOT M/SIDE L35 0PR DATE 17.03.19.



I give explicit permission for my name to be used in this response.

3. NAME JOSEPHINE PRINT NAME J. KELLY
ADDRESS 612 WARRINGTON RD RAINHILL
MERSEYSIDE L35 0NS DATE 12.3.19



I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME
ADDRESS
..... DATE
SIGNATURE

I give explicit permission for my name to be used in this response.

We have worked on this submission together.



**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:

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

Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

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

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

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	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

Our primary concern is the inevitability of an increase in the volume of traffic along Warrington Road (A57). We currently see & experience first hand traffic congestion on a daily basis. In our opinion any additional traffic is going to exacerbate this existing problem.

We believe that the developments under the Liverpool City Plan, including Scotchbarn Lane & the new Halshead Garden Village, will imminently be adding to this growing problem as they are also serviced by the A57.

The A57 is a direct route to & from Whiston hospital, ambulances & other emergency vehicles frequently have to navigate through very heavy traffic.

We are also aware that the Warrington Road/Rainhill Road & Portico Lane/Prescot Road junctions are confirmed, with Council figures, at capacity.

We live on the Briscoe estate, off Warrington Road, & have already noticed how at certain times of the day - especially at the start & end of school, & there are 5 in the vicinity - traffic creates a problem on the minor roads.

We are fearful that the negative impact of increased traffic will be felt in the numerous smaller estates & minor B & C roads off Warrington Road, which could then become dangerous short cuts.

It is also in our opinion that increased traffic will affect air pollution & pedestrian safety.

Between 2013-2015 St Helens had a higher than average death rate from respiratory diseases in the under 75s - 51.9 deaths per 100,000 compared to 44.3 in the North West & 33.1 in the rest of England.

As Rainhill residents we already experience delays in getting to see a GP. We are worried that additional housing will result in even longer waiting times for appointments at hospitals, doctors & dentists, or else the use of cars will be necessary to access surgeries & hospital facilities & also school places out of the immediate vicinity.

With the St Helens Council register for brownfield sites suggesting the availability for 5808 houses we question why the release of green belt land is necessary.

If the parcel of 3HS is removed from green belt & eventually developed it would create a continuous area of urban dwellings.

We are also extremely concerned that more than 13 **protected** species of flora & fauna can be found on the area of 3HS land.

Finally we strongly believe that the release of this parcel of green belt land defeats the whole essential purpose of green belt land in our communities.

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 proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

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		
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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.**

RO0672

Site 3HS.

22 FEB 2019

Wednesday 20th February
2019.

MR GOUGH
23 RYDER COURT
Rainhill
Merseyside
L35 4PW.

Dear sir or madam,

As a Resident of Rainhill and Eccleston park Golf club, I strongly object to the removal of Greenbelt status and the proposed development of 3HS Site.

This will absolutely destroy our local area and destroy the wildlife habitat to which there are many species including, owls, Bats, kestrels, stoats, woodpeckers, Kingfishers, hedgehogs and many more.

This will also be devastating to our local area which will cause increased pressure on the infrastructure that surrounds this Green Belt place.

If we lose this Greenbelt status we have lost it forever and will lose the open space which is used by families in the local area for walking and in a time when we have an obesity crisis the complete loss of open space where we can keep fit and healthy and promote this for our future generations will be very destructive.

Losing Eccleston park 3HS will be a complete loss of open space

and a quality landscaped area.

The development of houses in this area will cause great pressure on the infrastructure and also pressure on our drainage system on what is already a flooded area in the winter months.

We have an area of woodland at the edge of Eccleston Park Golf Club which is owned by the woodland trust, by developing this area and removing the Green Belt status from 3 H5 site will cause mayhem and destruction for the woodland trust site as well, we will be left with a concrete Jungle (URBAN SPRAWL) and we will pay for this in future generations to come, so please Support us and Do Not Remove this land from GREEN BELT.

yours

mr sean gaugh.

RO0673

Site 3 HS

22 FEB 2019

(12)

Wednesday 20th February
2019.

MRS GOUGH
23 RYDER COURT
Rainhill
Merseyside
L35 4PW.

Dear Sir or Madam,

I as a resident of Eccleston park Golf club object strongly against the development of houses planned to be built on green-belt land at the proposed site of 3 HS at Eccleston park Golf club. This is depriving the people of Rainhill of an open space that is the lungs of our local area. This green belt land is home to many species of wildlife and as a resident we see all these species of wildlife every day eg. Bats, Kingfishers, Woodpeckers, Kestrels, geese, stoats, ducks and many more wildlife.

Building on this site 3 HS and the other sites also will provide dangerous levels of pollution both air and ground and not to mention also the problems that arise from building too many concrete areas of housing and the increase of flooding at this site which is already suffering in the winter months by flooding on the Golf course in certain parts.

This development will cause mayhem

on the surrounding area, Rainhill is a small village and the increased population, vehicles and lack of infrastructure will be devastating to our local Area.

Taking Eccleston park Golf club out of Greenbelt will change the local Area forever for the worst possible reasons as once it is taken away it will be forever a concrete village and a great loss for our future generations. The Health of our future generations is important in this day and age and currently this open green space is being used by people to exercise and as a wooded walk for families.

These plans will put an already struggling Hospital, Doctors, Schools and other key services under immense pressure. I am not anti development but think that taking away this greenbelt land is a crime and as there are homes currently being developed on other sites which are Brownfield sites then this removal of greenbelt is not needed.

Please Support us and Keep this GREEN BELT Land.

yours

MRS SUSAN GOUGH.

RO0674



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: Jodie	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address: Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

13/05/19

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.

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	
	LPC08								
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 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 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

Please continue on a separate sheet if necessary

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.

We wish to put forward arguments against the removal from Green Belt of land parcel TTA4/GBL-074 and its allocation for housing as we believe the council's ~~argument~~ position is flawed.

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.

<input type="checkbox"/>	No , I do not wish to participate at the oral examination
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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 LPA09		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 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 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

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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel H14/CBL074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helier Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

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		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 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 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

Please continue on a separate sheet if necessary

Yes, I wish to participate at the oral examination

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>LP206</i>	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 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 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

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.

Unfortunately we do not know which policies to target as our representation, but we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4TGBP-074 and its allocation for housing as we believe the council's position is flawed. All the arguments we wish to put forward are within the attached document, which is - Assessment of the St Helens local plan and green belt review and phase one habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

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	LPC 05	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 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 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

Please continue on a separate sheet if necessary

Unfortunately we do not know which ~~the~~ policies to target as our representation, but hope we have addressed the correct ones. We wish to put forward arguments against the removal from the Green Belt of land parcel HA4/GBP-074 and its allocation for housing, as we believe the council's position is flawed.

Assessment of the St Helens Local Plan and Green Belt Review and the Phase 1 habitat survey.

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

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

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

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

Assessment of the St Helen's Local Plan and Green Belt Review

A report on behalf of the residents/owners of the
French Fields development, Clock Face
January 2017 and May 2019

13 MAY 2019

Version history:

- V1 Submitted January 2017
- V2 Re-submitted January 2017 with minor orientation corrections
- V3 March 2019:
 - a) *Cover page, and Foreword and Additions for the March/May 2019 representation added*
- V4 March 2019: Formatting and proofing corrections
- V5 May 2019:
 - a) *Updated to refer to records from Merseyside Bio-Bank and to include the citation for LWS_108*
 - b) *Updated to include results and observations from a Phase 1 habitat and bat transect surveys – added as Appendix*
 - c) *Added maps to show the differences in land parcel labelling as an Appendix. This is to assist in the reading of this report as land parcel labels have changed completely.*

Author: Glenys McBain, BSc (Hons)

Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."
 - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
"Likely to generate negative effects" for
 SA1. To protect and enhance biodiversity
 SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document.
- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat.
This is significant.
- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise.
2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:
"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."
 - 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
 - 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
 - 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
 - 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
 - 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;
 - 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
"Likely to promote positive effects "
SA5. To mitigate and adapt to the impacts of climate change.
SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.
reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."
It also scores SA5 using similar designations at several other land parcels for similar reasons.

However:

- 3.2. There are no recommendations as to how this could be achieved.
 - 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
 - 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS.
 - 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.
 - 3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).
 - 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore:
 - Removing HA4 from Green Belt increases risk to its GI;
 - Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole
 - The remaining Bold Forest Park GI does not have infinite capacity.
 - 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein.
 - 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;
 - 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
 - 4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub.
 - 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park.
 - 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.
 5. The Bold Forest Park AAP (adopted July 2017) states that:

“If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated.”

5.1. It has been argued throughout this document that the 2016/2017 LAP’s proposals to remove some of HA4’s constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change.

5.2. The AAP recognises that *“There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping.”*

- However, these properties surround and/or are part of GBP_074/HA4.
- Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
- The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.

5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *“Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling.”*

The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *“3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park...”*

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *“...has a strong boundary to the east ...”*
“...includes old coal mining buildings...” *“...and a new development...”*

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer’s side of the footpath, there is a ditch.

- The derelict coal mining buildings (an eyesore that had been used by light industry for several years before being abandoned) were demolished in March 2015 to make way for the new development referred to in the reports – that of French Fields. The first foundations were laid in the second half of 2015.
They do not detract from the openness of the Green Belt.
 - The council's reports imply that the new development was an extra new build on green-field land – not reuse of the brownfield site. In fact planning was refused for the application to develop the green-field half of the owner's land.
 - The new development (French Fields) is one of the five national case studies as part of the government's home building fund.
<https://www.gov.uk/government/publications/home-building-fund-developer-case-studies>
- 6.3. The community that is directly affected by the removal of HA4 from the Green Belt – and its subsequent development - is predominantly rural, bounded by rural land, industry and a few residential areas that are classed as part of one of the most deprived areas in the UK.
The visiting public who have expectations from the Bold Forest Park are also significantly affected.
Thus the number of respondents and representations will be low.
- 6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.
- 6.3.2. At least one large property developer has procured a part of the land within HA4 already and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. The NPPF encourages the active engagement of such developers in such a way - also with agreements in principle.
- 6.3.3. This seems to make the process unreasonable and unfair.

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016.

2. Draft Green Belt Review (GBR) 2016:

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from 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 GBR scored each parcel against the Level of Significance of its Green Belt function for purposes 1, 2 and 3 only at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are “... *not necessarily inappropriate or irrelevant*” (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

Confusing and inaccurate identification:

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).
2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, **thus giving rise to it remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps, is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has concluded (as have many councils' LAPs) that the aging population will shift housing needs from family accommodation to more care homes and easily accessible housing for small or single person households. The majority of the land in Location 21/HS03 would not be suitable for development for this type of housing based on accessibility alone.

It is also difficult to justify removing the protection of Green Belt status now for potential future housing needs where so many of the socio-economic dependencies are in flux due to the effects of the wider political environment.

3.3 Meeting the requirements for Sustainability and/or Suitability for Development:

The NPPF requires that land identified for removal from the Green Belt is capable of being developed. There are numerous reasons that indicate Location 21/HS03 does not meet these requirements.

3.3.1 Protection against climate change/flood risk:

1. Much of the land within Location 21/HS03 is intersected with drains, small ponds and sinks (St. Helens Strategic Flood Risk Assessment (SFRA) 2014), most especially the land to the west of the bridleways SN| |311 and SN| |312, which bisect the location from north west to south east .
2. This has a significant impact on any development as increased hard landscaping would increase flood risk for existing properties and road networks that surround it as well as affecting new.
3. The level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP) would make development untenable.
4. Even though the SFRA identified multiple areas within Location 21/HS03 as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels in Location 21 in the GBR.

3.3.2 Ecology, Habitat and Biodiversity:

1. **Hedgerows** – including part of the old Parish boundary on SN| |307 – are precious resources and should be preserved and enhanced to encourage biodiversity. The western portion of Location 21/HS03 retains many of its hedgerows and the French Fields development has enhanced this network by planting new native hedging around its perimeter.
2. **LWS_108**: No case has been made to remove LWS_108 from the Green Belt, nor should it be, as it cannot be classed as development land for flood risk and ecological reasons.
3. Removing HS03 from the Green Belt would result in **LWS_108** becoming isolated, which is not a good outcome. It is suggested that not only does retaining the Green Belt at Location 21/HS03 creates a green corridor to the LWS from Clock Face Country Park, but also enhances its viability.
4. **Protecting UK Priority Species and Habitats**: During 2016, several breeding pairs of skylarks (*Alauda arvensis*) were witnessed in GBS_051. In addition, lapwings (*Vanellus vanellus*) were witnessed as nesting in GBS_120. Both of these are protected UK Priority Species.

5. **The NBN Gateway** shows that corn bunting (*Emberiza calandra*), skylark, lapwing, brown hare (*Lepus europaeus*) and great crested newt (*Triturus cristatus*) have been recorded in the vicinity of Location 21/HS03. It is fair to assume these UK Priority Species could be encouraged to flourish with proper management of the sites within Location 21/HS03. There are many records of urban birds in nearby Clock Face and three species of bat in the Country Park area.
6. There is no evidence of **Phase 1 Habitat survey data** beyond 2001 being used to assess the ecology within the whole LAP. As much has changed since then, it would be sensible to have these carried out on the parcels in Location 21. The habitats and findings to date would indicate that several UK Priority Species could be present.
7. Mitigation techniques for dealing with UK Priority Species and Habitats found, would again render development of the land for much of Location 21/HS03 as untenable, at the very least to the west of the bisecting bridleways.
8. From these findings alone, it could be argued that, at the very least, the area of Location 21/HS03 to the west of the bisecting bridleways should be managed as part of a mosaic habitat, providing habitats suitable for Priority Species (including undisturbed land) and linking across to the rest of the Green Belt. Extending the Bold Forest Park woodland by planting trees in [parts of] GBS_051 and/or GBS_120 could also be valid approach. This would give a belt of woodland across from the Country Park to the woodland in LWS_108. Any of these solutions allow a connecting green corridor to and from Clock Face Country Park.
9. This area is part of the Bold Forest Park and Mersey Forest initiatives and the Council has obligations to those.

3.3.3 Access to open spaces:

1. Location 21/HS03 is bisected south west to north east by the main footpath running along the parish boundary SN| |308; has several other footpaths linking to this, SN| |307, SN| |314, SN| |315 and SN| |316; and bridleways that bisect the site from north west to south east, SN| |311 and SN| |312. These public rights of way give access to each of the surrounding settlements, to the Clock Face Country Park and wider countryside without needing to use the car. This is a key strategic aim in the LAP.
2. Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by this open countryside. It helps to create the ambiance of tranquillity before visitors enter the Park.

3.3.4 Other significant factors:

1. If Location 21/HS03 is removed from the Green Belt, it will amalgamate several settlements: Clock Face, Sutton Leach, Sutton, New Bold, Bold and Abbeyfield. This contravenes Purpose 2 of the Green belt Review.
2. The rural infrastructure (rural roads; Green Belt border to one side, intermittent housing on the other; lack of public transport, power and water) in the Gorsey Lane vicinity means it is not able to cope with additional population or traffic needs if any development for Location 21/HS103 is put forward.
3. The double line of electricity pylons running along the north western border of Location 21/HS03 will require space around them for maintenance access. They also influence the viability of development land around them.
4. As this is the area with heaviest pollution (noise and air quality, mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4. Conclusion/alternatives:

4.1 Option 1

The area identified as Location 21 in the GBR (with the possible exception of the area identified as HA6 in the LAP) should be reviewed as a whole (preferred option and stated as such at stage 4 of the GBR) **but absolutely should not be removed from Green Belt status, for the reasons defined above.** This would mitigate, to some extent, the removal of allocated employment land identified as EA1 (Appendix 15, LAP), and proposed safeguarded employment land identified as ES-01 and ES-02 (Appendix 16, LAP), from the south eastern area of the St Helen's Green Belt bordering the M62. This was identified as a necessary strategic requirement in the Employment Needs Study 2015 and the AECOM Local Plan Economic Evidence Base Paper (2015).

Much of the new housing allocation predictions are through expectations of housing requirements from the new employment. However, as the main allocation in question is at the south eastern edge of the Green Belt, and is along the M62 corridor on the very edge of the Warrington boundary (actually increasing sprawl), it is highly likely that much of the housing demand will be outside the St Helens jurisdiction.

A disproportionate amount of land is proposed to be removed from Green Belt in the southern area as opposed to other areas of the St Helens Green Belt, despite that going against the Bold Forest Park AAP and the Mersey Forest initiative. This area is integral to these initiatives, which the LAP states will not be affected. This will have a greatly detrimental impact on the landscape character of the area. In addition, the AAP makes recommendations to improve this area.

Removal of these areas of Green Belt significantly reduces the strategic gap between large towns of St Helens and Warrington.

Once these sites are removed from Green Belt, they will not be returned to it - so beyond 2034 they will not be protected. This is a dangerous proposition for such important land on a statistical projection rather than facts.

4.2 Option 2

As half of the parcel of land identified as GBS_119 in the GBR has been designated for removal from the Green Belt with immediate effect (HA6 in Appendix 11 of the LAP), and if there is a real perceived need for safeguarded housing allocation land AT THIS TIME, notwithstanding the other considerations, then an alternative compromise option could be considered.

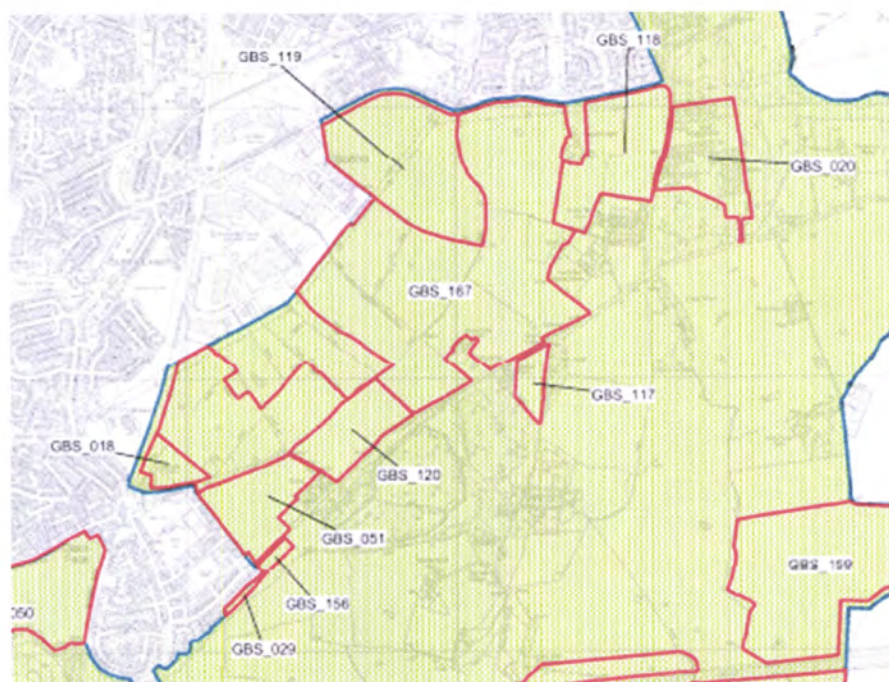
Parcels GBS_118, the remaining half of GBS_119 and the most north easterly parcel of GBS_162 in Location 21 could be examined independently as to their viability for development. If viable, these parcels could then be removed from the Green Belt into Safeguarded land, **leaving the remaining land within the Green Belt.**

This approach could be justified as:

1. There is a distinct and identifiable boundary for these parcels together - Reginald Road Industrial estate; B5204; Neills Road; footpath SN| |315 and the drain edging the south of GBS_119.
2. These parcels are close to all required sustainable infrastructure (rail, road networks, power and water).
3. Easy access to public transport.

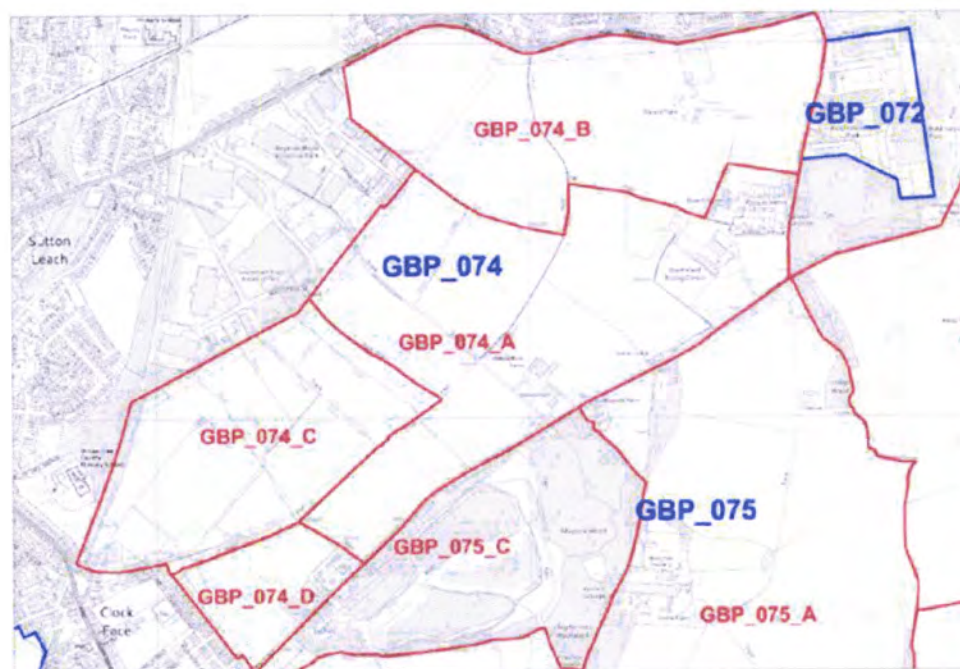
4. These parcels directly abut the B5204 and have no buildings close to the road on that boundary. Thus road networks are in place to deal with the volume of new traffic and can easily be adapted or extended to provide new access points to these land parcels.
5. Much less impact on combining settlements as fewer affected;
6. Many fewer watercourses, thus not as great, and therefore more manageable, impact on the ecology, climate change control and flood risk.
7. Retains a clear and simple boundary for the Green Belt and would not be classed as sprawl.
8. Retains much of the land to use for enhancing the landscape and environment, allowing the Council to meet many of their obligations in the Bold Forest Park AAP.
9. Retains the open landscape and green infrastructure, providing easy access between communities by existing footpaths and bridleways.
10. Addresses the potential isolation of LWS_108 and realistically retains it in the Green Belt.
11. Addresses many of the concerns identified in Option 1.

Appendix 1 – Maps of land parcels label changes between the 2016 proposals and the 2019 submission draft - to assist in the reading of this report



Above -
Detailed land parcels and sub-parcels in Location 21 – from promoted sites map 2016

And below:
Detailed land parcels and sub-parcels for GBP_074 from Page 345 of the Green Belt Review 2018



A report on the findings of a Partial Phase 1 habitat survey and three bat transects

for
LAND PARCEL GBP_74/HA4:
In the Green Belt Review 2018 and
The St Helens Local Plan 2020-2035 respectively

May 2019

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1 Executive summary

Many local residents are concerned that the council has decided to remove several parcels of land from the Green Belt, with the consequential loss of habitats and priority species, and of their own open space for wellbeing and recreational purposes.

In addition, the allocation of the land parcel covered in this report to housing with immediate effect has caused greater concern in a wider sense as to its appropriateness (and at such levels) in the locality.

When records were sought to identify land use and species present, it was discovered that many records are quite old. It was felt that up to date information was required to ensure accuracy of reporting.

Whilst this was a limited phase 1 survey, its findings show that:

- The green space is highly valued and well used by the local populace for its open space and landscape, its recreational and health use. It is a conduit between “villages” and other recreational spaces, and for walking, getting close to nature, dog walking and horse riding in their own right.
- Arable farming forms a significant portion of the 164 hectares or so of the land parcel (approximately 55%). Approximately 30% is permanent grassland (grazing land in the equestrian businesses, neutral grassland in the LWS, and some haylage), with the remainder as other habitats (woodland, hedge, ditches, ponds).
- The mosaic habitats of HA4 provide a significant green connection between Local Wildlife Sites (LWS), Local Nature Reserves (LNR) and other “green” areas, thus is of significant value to wildlife.
- HA4 is a commuting and foraging area for bats and raptors. Common Pipistrelle (*Pipistrellus pipistrellus*); Soprano Pipistrelle (*Pipistrellus pygmaeus*); Noctule (*Nyctalus noctula*); Buzzard (*Buteo buteo*) and Kestrel (*Falco tinnunculus*) were observed, although not in significant numbers. This could have been due to the exceptionally cold conditions on the survey dates. A hunting owl was also heard, but could not be definitively identified.
- Key Priority Species of Farmland birds are present and breeding in significant numbers over the whole site, Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*) and Snipe (*Gallinago gallinago*) in particular.
- The Regionally important species (North West Biodiversity Audit) English Comfrey (*Symphytum officinale*) is present scattered across the land parcel.
- The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds surrounded by mature deciduous trees. All the ditches observed had some standing water present.
- On a negative note, the western edge of GBP_074/HA4 is bounded by a disused railway line which is dominated by significant stands of Japanese Knotweed (*Fallopia japonica*) – many of which touch the boundary itself.
- Some fly tipping was observed to the north of the LWS and the boundary of Reginald Road/the industrial estate.

In summary then, this land parcel plays a significant role in the biodiversity of the area, the openness of the landscape and the health of its local population. Its loss would be significant.

2 Introduction to the surveys

In the eight week period between 31/03/2019 and 13/05/2019, a partial phase 1 habitat survey was undertaken on the land parcel known as HA4 in the St Helen’s Local Plan 2020-2035 and GBP_74 in the Green Belt Review 2018.

The purpose of the report was to record the current land use and species found in the land parcel as the council is proposing to remove this whole parcel from the Green Belt. Many existing records for this area are quite old, and it is felt that an up to date record is useful and necessary, especially as it pertains to the Bold Forest Park AAP (approved July 2017).

There is much concern within the local population that the character of the landscape will change to the detriment of their outlook, their mental health and their access to open space. In addition, many are concerned about the loss of wildlife and the effects on the environment that would result from the land use being changed to housing.

3 Methodology

3.1 Habitat surveys

Surveys were undertaken on the 30/03/2019, 08/04/2019, 20/04/2019, 07/05/2019 and 09/05/2019: to observe and record habitats and species from public rights of way (accessed from different locations).

Observations were collated, a list of species found created, a map created to show the habitats/land use within the land parcel and key biodiversity findings and observations noted.

Records will be submitted to the Merseyside Bio Bank project.

In addition, the surveys are to observe the existing public rights of way and their current use; negative impacts of invasive species and evidence of fly tipping.

3.2 Bat transect surveys

Three transect surveys were undertaken on the 30/03/2019, 21/04/2019 and 06/05/2019.

Data was collected and recorded using a variety of devices. The surveys were completed in line with the Bat Conservation Trust Good Practice Guidelines (Collins 2016).

Records will be submitted to the Merseyside Bio Bank project.

3.3 Limitations

Due to lack of time and access, the surveys were conducted by trained volunteers from public access footpaths that run through and across the land parcel, as well as observations from the surrounding roads and the disused railway line. Hence only partial data, though extensive, was able to be collected.

Due to lack of access, the citation and map for LWS_108 from 2016 (Merseyside Environmental Advisory Service) have been attached as complementary evidence to that collected during the surveys. *Where observation was not possible, their classification has been used to complete the habitat map.*

The site shows several habitat features that make it suitable for a range of mammals, reptiles and amphibians, including Water Vole (*Arvicola amphibius*) and Great Crested Newt (*Triturus cristatus*) that have previously been recorded here. This survey did not cover those aspects.

4 Findings

4.1 Main habitat classifications and findings;

The table in Appendix 1 shows the list of species found during the surveys. The maps in Appendix 3 show: the main findings for the habitat types observed during the surveys and a connectivity plan showing ecological pathways.

The field behind Gorsey Lane and Crawford Street (south west) shows overgrazing and poaching of the (semi-improved) grassland with 9 horses present at the time of survey. There is no evidence of the field being skipped out. This being noted, the tussocks of grass and vegetation appear to support breeding Lapwing (*Vanellus vanellus*) and Skylark (*Alauda arvensis*).

Not all the fields of Tunstalls Farm (a livery stable business to the north west) were easy to see, but they all appear to be permanent (semi-improved) grassland grazed by horses. They show good management with no overgrazing evident and fields being used in rotation. The rest of this land is neutral and marshy grassland that makes up LWS_108. The LWS is covered separately in 4.4.

The section of old parish boundary between the land parcels above has mature trees (mainly Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*), with some Hawthorn (*Crataegus monogyna*), Wild Cherry (*Prunus avium*), Sycamore (*Acer pseudoplatanus*), Hazel (*Corylus avellana*) and Elder (*Sambucus nigra*). There are two sections of fenced land in the area where the footpath exits the land parcel to the west. One has a marshy character, the other more ruderal.

All of the arable fields (cereal crops this year) appear to have a 3 – 5m arable margin of grassland. High numbers of farmland bird species (see 4.2) were present in these fields, especially Skylark (*Alauda arvensis*).

As expected, the highest floral diversity was present in the field margins, ditches and woodland habitats. There are many scattered ponds over the site, the majority of which are surrounded by mature trees. All ditches had some standing water, with more ditches present than anticipated following the desk study. The intact hedgerows present on site appear to support a wide range of smaller bird species despite being species poor with Hawthorn (*Crataegus monogyna*) dominant.

Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*) continue to dominate the woodlands, although Alder (*Alnus glutinosa*) is frequent in the wet woodland at the north of the LWS.

One Regionally Important Plant Species that was found scattered across the whole land parcel was English or Common Comfrey (*Symphytum officinale*).

4.2 Key data for Farmland birds

The table in Appendix 1 shows the findings for the bird species observed during the surveys. Several breeding pairs of key farmland birds were observed, the following being of particular import:

Taxon name	Common Name	Notes
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs especially on the arable fields.
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs especially on the grassland.

4.3 Key data for Bats

The following table and survey maps in Appendix 2 show the dates and locations for the bat species recorded during the transect surveys.

Taxon name	Common Name	Notes
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences
<i>Nyctalus noctula</i>	Noctule	Single occurrence

The first transect was abandoned within 30 minutes as the temperature dropped to 2°C and would not have given valid data. Even so, the sightings were of the same species and in the same locations as in the first part of the subsequent transects – and transect three as a whole.

The bats showed in smaller numbers than expected but this could have been due to the unusually cold evenings this spring.

4.4 Local Wildlife Site (LWS_108)

Observations were made from the footpaths at the south and east, thus significant areas could not be observed even with binoculars due to the trees and hedges in the interior.

The citation and map from 2016 (Merseyside Environmental Advisory Services through Merseyside Bio-Bank Services) are included as Appendix 5 to help remedy this.

There was no management plan with the citation but it was noted that the species rich eastern field was showing significant succession growth (by Goat Willow (*Salix caprea*) in particular) and this will need to be controlled to keep the site's main BAP habitats as neutral grassland/marshy grassland.

The minimal horse grazing on other parts of the site appears to be working well.

4.5 Other important observations

All of the public footpaths through and across the land parcel show evidence of high usage by pedestrians - dog walkers in particular.

The central north/south footpath/bridleway was mown on the final visit, presumably to improve access and this is helpful.

The whole site has a pleasing open aspect with views across to Winter Hill.

The disused railway line that borders the site on the north-west is dominated by large stands of Japanese Knotweed (*Fallopia japonica*), in places touching the boundary. This is a significant problem as the pathway is well used and it could spread rapidly.

There is evidence of fly tipping on the north edge of the LWS. This is not extensive, but unsightly. Measures have been taken to reduce this with signs saying "NO TIPPING" and "24 hour CCTV in place". Otherwise tipping and litter are minimal.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5 Appendices

5.1 Appendix 1

Species List in table format.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Acer campestre</i>	Field Maple	<i>Glyceria fluitans</i>	Floating Sweet Grass
<i>Acer pseudoplatanus</i>	Sycamore	<i>Hedera helix</i>	Ivy
<i>Aegopodium podagraria</i>	Ground Elder	<i>Heracleum sphondylium</i>	Hogweed
<i>Aesculus hippocastanum</i>	Horse Chestnut (seedling)	<i>Holcus lanatus</i>	Yorkshire Fog
<i>Agrostis stolonifera</i>	Creeping Bent	<i>Holcus mollis</i>	Creeping Soft Grass
<i>Ajuga reptans</i>	Bugle	<i>Hyacinthoides x massartiana</i>	Bluebells (hybrid)
<i>Alisma plantago-aquatica</i>	Alder	<i>Ilex aquifolium</i>	Holly
<i>Alisma plantago-aquatica</i>	Water Plantain	<i>Iris pseudacorus</i>	Yellow (Flag) Iris
<i>Alliaria petiolata</i>	Garlic Mustard	<i>Juncus conglomeratus</i>	Compact Rush
<i>Allium ursinum</i>	Wild Garlic (Ramsons)	<i>Juncus effusus</i>	Soft Rush
<i>Alnus glutinosa</i>	Alder	<i>Juncus inflexus</i>	Hard Rush
<i>Alopecurus pratensis</i>	Meadow Foxtail	<i>Lamium album</i>	White Dead-nettle
<i>Angelica sylvestris</i>	Angelica	<i>Lamium purpureum</i>	Red Dead-nettle
<i>Anisantha sterilis</i>	Barren Brome	<i>Lathyrus pratensis</i>	Meadow Vetchling
<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass	<i>Leucanthemum vulgare</i>	Oxeye Daisy
<i>Anthriscus sylvestris</i>	Cow Parsley	<i>Lolium perenne</i>	Rye Grass
<i>Apium nodiflorum</i>	Fool's-water-cress	<i>Lonicera periclymenum</i>	Honeysuckle
<i>Arrhenatherum elatius</i>	False Oat Grass	<i>Lotus corniculatus</i>	Birds Foot Trefoil
<i>Artemisia vulgaris</i>	Mugwort	<i>Lupinus sps</i>	Lupin (garden escape)
<i>Bellis perennis</i>	Daisy	<i>Lythrum salicaria?</i>	Purple Loosestrife?
<i>Betula pendula</i>	Silver Birch	<i>Malus sylvestris</i>	Crab Apple
<i>Brassica napus</i>	Oil-seed Rape	<i>Matricaria discoidea</i>	Pineapple weed
<i>Calystegia silvatica</i>	Large Bindweed	<i>Mentha aquatica</i>	Water Mint
<i>Cardamine flexuosa</i>	Hairy Bittercress	<i>Myosotis scorpiodes</i>	Water Forget-me-not
<i>Cardamine pratense</i>	Cuckoo flower	<i>Narcissus sps</i>	Daffodil (garden escape)
<i>Carex canescens?</i>	White Sedge?	<i>Oenanthe crocata</i>	Hemlock Water Dropwort
<i>Carex pendula</i>	Pendulous Sedge	<i>Pentaglottis sempervirens</i>	Green Alkanet
<i>Centaurea nigra</i>	Knapweed	<i>Phalaris arundinacea</i>	Reed Canary Grass
<i>Cerastium fontanum</i>	Common Mouse-ear	<i>Plantago lanceolata</i>	Ribwort Plantain
<i>Chamerion angustifolium</i>	Rosebay Willowherb	<i>Plantago major</i>	Greater Plantain
<i>Cirsium arvense</i>	Creeping Thistle	<i>Poa annua</i>	Annual Meadow Grass
<i>Cirsium palustre</i>	Marsh Thistle	<i>Poa trivialis</i>	Rough Meadow Grass
<i>Cirsium vulgare</i>	Spear Thistle	<i>Potentilla anserina</i>	Silverweed
<i>Cornus sanguinea</i>	Dogwood	<i>Potentilla reptans</i>	Creeping Cinquefoil
<i>Corylus avellana</i>	Hazel	<i>Prunus avium</i>	Wild Cherry
<i>Crataegus monogyna</i>	Hawthorn	<i>Prunus spinosa</i>	Blackthorn
<i>Dactylis glomerata</i>	Cocksfoot	<i>Pteridium aquilinum</i>	Bracken
<i>Deschampsia cespitosa</i>	Tufted Hair Grass	<i>Quercus robur</i>	Oak
<i>Deschampsia flexuosa</i>	Wavy Hairgrass	<i>Ranunculus acris</i>	Meadow Buttercup
<i>Digitalis purpurea</i>	Foxglove	<i>Ranunculus repens</i>	Creeping Buttercup
<i>Dipsacus fullonum</i>	Teasel	<i>Rosa arvensis</i>	Field Rose
<i>Dryopteris dilatata</i>	Broad Buckler Fern	<i>Rosa canina</i>	Dog Rose
<i>Dryopteris filix-mas</i>	Male Fern	<i>Rosa rugosa</i>	Hedge Rose (garden escape)
<i>Elytrigia repens</i>	Common Couch	<i>Rubus sps</i>	Bramble
<i>Epilobium hirsutum</i>	Greater Willowherb	<i>Rumex acetosa</i>	Common Sorrel
<i>Epilobium montanum</i>	Broad Leaved Willowherb	<i>Rumex crispus</i>	Curl'd Dock
<i>Equisetum arvense</i>	Field Horsetail	<i>Rumex obtusifolius</i>	Broad-Leaved Dock
<i>Equisetum fluviatile</i>	Water Horsetail	<i>Rumex sanguineus</i>	Wood Dock
<i>Euonymus europaea</i>	Spindle Tree	<i>Salix caprea</i>	Goat Willow
<i>Festuca rubra</i>	Red Fescue	<i>Salix fragilis</i>	Crack Willow
<i>Ficaria verna</i>	Celandine	<i>Sambucus nigra</i>	Elder
<i>Filipendula ulmaria</i>	Meadowsweet	<i>Scrophularia auriculata</i>	Water Figwort
<i>Fraxinus excelsior</i>	Ash	<i>Senecio jacobaea</i>	Common Ragwort
<i>Fumaria officinalis</i>	Common Fumitory	<i>Senecio vulgaris</i>	Groundsel
<i>Galium aparine</i>	Cleavers	<i>Silene dioica</i>	Red Campion
<i>Geranium pyrenaicum</i>	Hedgerow Cranes-bill (garden escape?)	<i>Sisymbrium officinale</i>	Hedge Mustard
<i>Geranium robertianum</i>	Herb Robert	<i>Solidago canadensis</i>	Goldenrod (garden escape)
<i>Geum urbanum</i>	Wood Avens	<i>Sonchus asper</i>	Prickly Sow Thistle

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Sorbus aucuparia</i>	Rowan	<i>Tussilago farfara</i>	Coltsfoot
<i>Stellaria holostea</i>	Greater Stitchwort	<i>Typha latifolia</i>	Reed Mace
<i>Stellaria media</i>	Chickweed	<i>Urtica dioica</i>	Common Nettle
<i>Symphytum officinale</i>	Common Comfrey	<i>Veronica polita</i>	Grey Field Speedwell
<i>Symphytum x uplandicum</i>	Russian Comfrey	<i>Viburnum opulus</i>	Guelder Rose
<i>Taraxacum officinale</i>	Dandelion	<i>Vicia cracca</i>	Tufted Vetch
<i>Trifolium dubium</i>	Lesser Trefoil	<i>Vicia hirsuta</i>	Hairy Tare
<i>Trifolium pratense</i>	Red Clover	<i>Vicia sativa</i>	Common Vetch
<i>Trifolium repens</i>	White Clover	<i>Vicia sepium</i>	Bush Vetch
<i>Tripleurospermum inodorum</i>	Scentless Mayweed		

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aegithalos caudatus</i>	Long-tailed tit	
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs
<i>Anas platyrhynchos</i>	Mallard	(pair)
<i>Buteo buteo</i>	Buzzard	
<i>Carduelis carduelis</i>	Goldfinch	flock of 8
<i>Columba palumbus</i>	Wood Pigeon	several
<i>Corvus corone</i>	Carrion Crow	
<i>Cyanistes caeruleus</i>	Blue tit	
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Erithacus rubecula</i>	Robin	
<i>Falco tinnunculus</i>	Kestrel	
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Hirundo rustica</i>	Swallow	
<i>Parus major</i>	Great tit	
<i>Passer domesticus</i>	House Sparrow	several -including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Periparus ater</i>	Coal tit	
<i>Phasianus colchicus</i>	Pheasant	
<i>Phylloscopus collybita</i>	ChiffChaff	(several)
<i>Pica pica</i>	Magpie	
<i>Sturnus vulgaris</i>	Starling	
<i>Sylvia communis</i>	Whitethroat	
<i>Troglodytes troglodytes</i>	Wren	
<i>Turdus merula</i>	Blackbird	several
<i>Turdus viscivorus</i>	Mistle Thrush	
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aglais io</i>	Peacock Butterfly	
<i>Anthocharis cardamines</i>	Orange Tip Butterfly	
<i>Bombus lapidarius</i>	Red-tailed Bumble	
<i>Bombus lucorum</i>	White tailed Bumble Bee	
<i>Coccinella magnifica</i>	Ladybird	
<i>Pararge aegeria</i>	Speckled Wood Butterfly	
<i>Pieris rapae</i>	Small White Butterfly	

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Nyctalus noctula</i>	Noctule	Single occurrence
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Oryctolagus cuniculus</i>	Rabbit	

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.2 Appendix 2

Map of GBP_74/HA4 showing transect route and bats recorded

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Results of the two successful bat transects:



Mapping of the results from the bat transect number 2 on 21/04/2019



*Mapping of the results from the bat transect 06/05/2019
showing Common Pipistrelle (Pipistrellus pipistrellus) in red and Soprano Pipistrelle (Pipistrellus pygmaeus) in orange*

Note: The results of the last transect (06/05/2019) are very similar to the findings during the abandoned transect (30/03/2019) where the results were not recorded.

In both cases the temperature was very low (2°C in the abandoned; down to 7°C in the last).

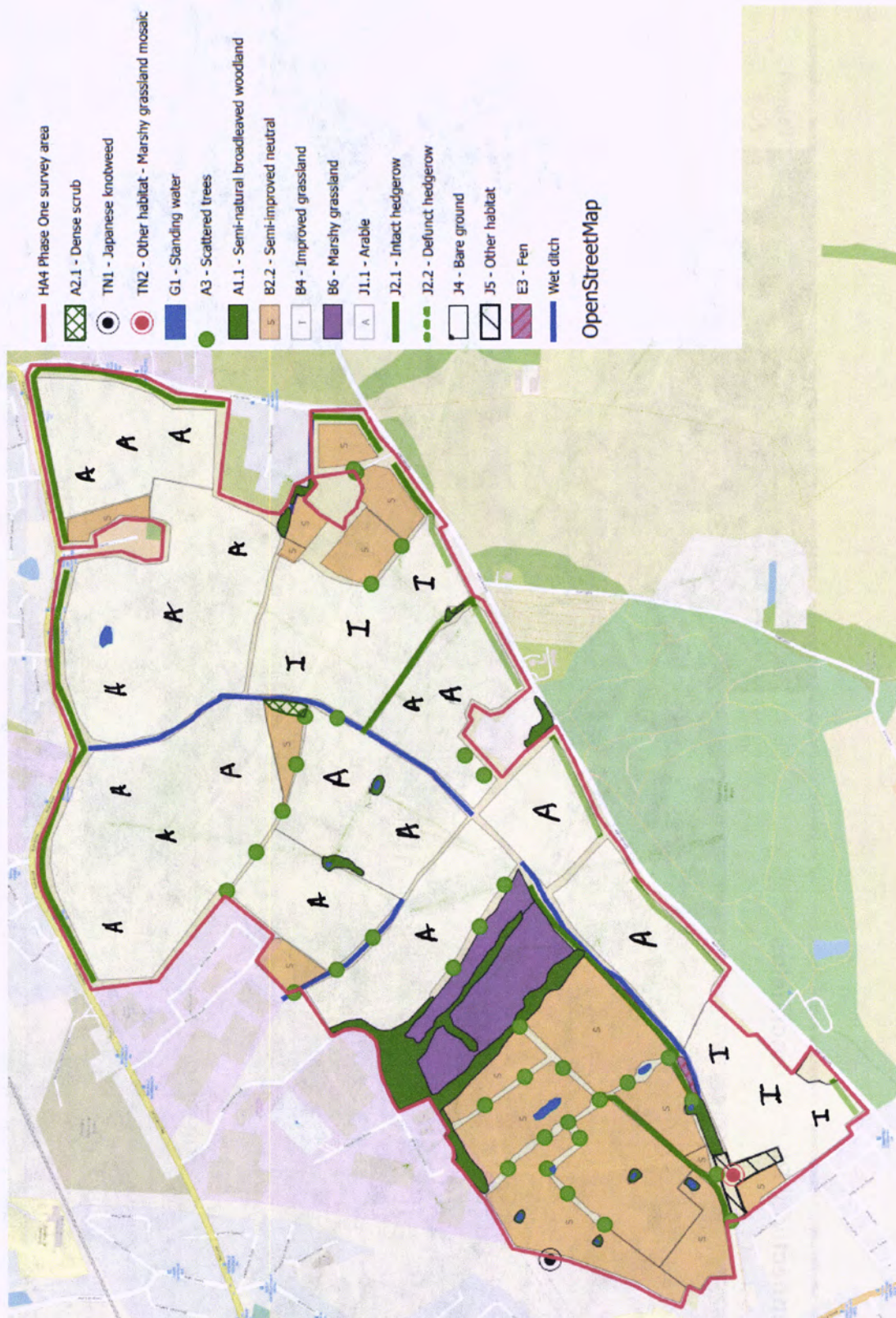
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.3 Appendix 3

Phase 1 Habitat Map of GBP_74/HA4
And
Connectivity Plan for GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019





Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.4 Appendix 4

Photos taken during Phase 1 survey of GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



View south across Tunstalls Farm from disused railway line



View north across Tunstalls Farm from old parish boundary



Looking towards Clock Face Country Park from old parish boundary



One of many ponds on site



Looking north across the LWS grassland



Eastern field of LWS

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Looking north from LWS across arable fields



Looking north east across arable fields from central footpath



Stands of Japanese Knotweed at the western boundary



Horses grazing at Tunstalls Farm



View north east over arable land



View north over arable fields

5.5 Appendix 5

The Citation for LWS_108 Tunstalls Farm (2016)
and
The Map for LWS_108 Tunstalls Farm (2016)

*(supplied by Merseyside Environmental Advisory Service
through Merseyside Bio-Bank Services)*

Site Name: Tunstall's Farm (formerly Field north of Gorsey Lane)

Site Area: 15.05 hectares **National Grid Reference:** SJ534921

Date of Designation: April 1994 (part) **District:** St. Helens

Date of Last Revision: September 2016 **Local Wildlife Site Number:** 108

CITATION: A group of small agricultural fields with an extensive ditch and hedgerow network. The field is now under Environmental Stewardship and is developing into a species rich meadow including, regionally and locally important species. The ponds and ditches on site provide habitat for water vole and great crested newts.

APPRAISAL: This site has been evaluated against the guidelines approved by the Council for selection of Local Wildlife Sites. The site's evaluation against the guidelines is set out below.

Guideline		Comment
HABITATS		
H1; H2; H3; H4.	Rarity Diversity Nearness Isolation	1 priority BAP habitat; 3 regionally important habitats. 11 habitats recorded. 31 sites within 1Km. --
PLANTS		
SP1; SP2; SP3; SP4.	Rarity Diversity Naturalness Nationally Rare	1 regionally important species; 1 locally rare species. Total of 74 plant species. 95.95% of the plants are native to the borough. Colonisation has been aided by man and the site has been physically altered. --
ANIMALS		
General SP5; Birds B1; B2; B3; B4; B5.	Rare/priority Non-breeding population Breeding population Regional rare/scare Breeding assemblage Assemblage, breeding, wintering, passage.	-- -- -- -- -- --
Dragonflies Od1. Od2. Butterflies Bf1; Bf2.	Breeding Regional rare/scarc Region rare breeding Breeding assemblage	-- -- -- --
Amphibians A1; A2. Reptiles R1; R2; Bats Bat1; Bat2.	Rarity Exceptional populations Population of native species. Exceptional population Roost Assemblage	Guideline met – Great crested newt -- -- --
Mammals Mam1.	Breeding	Guideline met – Water vole.

SUMMARY: The combination of these factors has led to this site being identified as a Local Wildlife Site.

NOTE: Validated data from 1981 to September 2016 have been used in this assessment. Other data may become available to support this designation.

Status of species of nature conservation importance

Habitats

1 Priority BAP habitat	Unimproved neutral grassland
3 Regionally important habitats (North West Biodiversity Audit)	Unimproved neutral grassland Marshy grassland Standing water

Plants

1 Regionally important species (North West Biodiversity Audit)	Common comfrey (<i>Symphytum officinale</i>)
1 Locally rare species	Fen Bedstraw (<i>Galium uliginosum</i>)

Animals

Amphibians

1 Habitats Regulations 2010 – Schedule 2 species	Great crested newt (<i>Triturus cristatus</i>)
1 Wildlife and Countryside Act – Schedule 5 species	

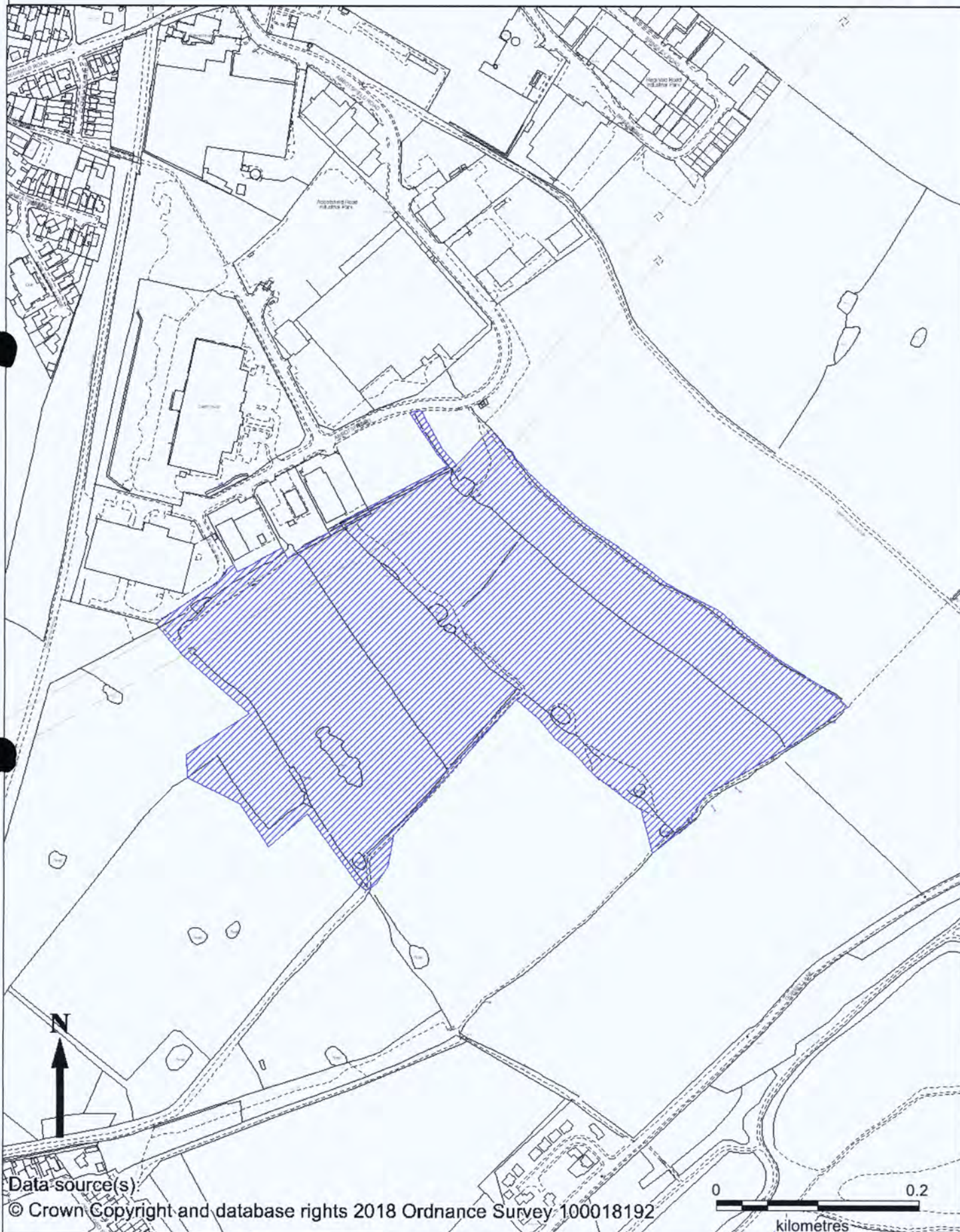
Mammals

1 Wildlife and Countryside Act – Schedule 5 species	Water vole (<i>Arvicola terrestris</i>)
--	---

Local Wildlife Site 108
Tunstalls Farm
Scale: 1:2500



Merseyside
Environmental
Advisory Service





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: Jodie	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address: Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

13/05/19

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.

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	LPC08	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 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 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

Please continue on a separate sheet if necessary

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.

We wish to put forward arguments against the removal from Green Belt of land parcel TTA4/GBL-074 and its allocation for housing as we believe the council's ~~original~~ position is flawed.

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
--	--

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 LPA09		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 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 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

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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel H14/CBL074 and its allocation for housing as we believe the council's position is flawed.
All the arguments we wish to put forward are within the attached documents: Assessment of the St Helier Local Plan and Green Belt Review and Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

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		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 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 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

Please continue on a separate sheet if necessary

Yes, I wish to participate at the oral examination

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>LP206</i>	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 checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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Unfortunately we do not know which policies to target as our representation, but we hope we have addressed the correct ones. We wish to put forward arguments against the removal of green belt of land parcel HA4TGBP-074 and its allocation for housing as we believe the council's position is flawed. All the arguments we wish to put forward are within the attached document, which is - Assessment of the St Helens local plan and green belt review and phase one habitat survey.

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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<p>No, I do not wish to participate at the oral examination</p>	<p>Yes, I wish to participate at the oral examination</p>
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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 LPC 05	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 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 checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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Unfortunately we do not know which ~~the~~ policies to target as our representation, but hope we have addressed the correct ones. We wish to put forward arguments against the removal from the Green Belt of land parcel HA4/GBP_074 and its allocation for housing as we believe the council's position is flawed.

All the arguments we wish to be put forward are within the attached documents:

Assessment of the St Helens Local Plan and Green Belt Review and the Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

Assessment of the St Helen's Local Plan and Green Belt Review

A report on behalf of the residents/owners of the
French Fields development, Clock Face
January 2017 and May 2019

13 MAY 2019

Version history:

- V1 Submitted January 2017
- V2 Re-submitted January 2017 with minor orientation corrections
- V3 March 2019:
 - a) *Cover page, and Foreword and Additions for the March/May 2019 representation added*
- V4 March 2019: Formatting and proofing corrections
- V5 May 2019:
 - a) *Updated to refer to records from Merseyside Bio-Bank and to include the citation for LWS_108*
 - b) *Updated to include results and observations from a Phase 1 habitat and bat transect surveys – added as Appendix*
 - c) *Added maps to show the differences in land parcel labelling as an Appendix. This is to assist in the reading of this report as land parcel labels have changed completely.*

Author: Glenys McBain, BSc (Hons)

Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."
 - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
"Likely to generate negative effects" for
 SA1. To protect and enhance biodiversity
 SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document.
- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat.
This is significant.
- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise.
2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:
"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."
 - 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
 - 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
 - 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
 - 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
 - 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;
 - 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
"Likely to promote positive effects "
SA5. To mitigate and adapt to the impacts of climate change.
SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.
reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."
It also scores SA5 using similar designations at several other land parcels for similar reasons.

However:

- 3.2. There are no recommendations as to how this could be achieved.
 - 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
 - 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS.
 - 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.
 - 3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).
 - 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore:
 - Removing HA4 from Green Belt increases risk to its GI;
 - Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole
 - The remaining Bold Forest Park GI does not have infinite capacity.
 - 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein.
 - 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;
 - 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
 - 4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub.
 - 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park.
 - 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.
 5. The Bold Forest Park AAP (adopted July 2017) states that:

“If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated.”

5.1. It has been argued throughout this document that the 2016/2017 LAP’s proposals to remove some of HA4’s constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change.

5.2. The AAP recognises that *“There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping.”*

- However, these properties surround and/or are part of GBP_074/HA4.
- Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
- The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.

5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *“Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling.”*

The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *“3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park...”*

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *“...has a strong boundary to the east ...”*
“...includes old coal mining buildings...” *“...and a new development...”*

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer’s side of the footpath, there is a ditch.

- The derelict coal mining buildings (an eyesore that had been used by light industry for several years before being abandoned) were demolished in March 2015 to make way for the new development referred to in the reports – that of French Fields. The first foundations were laid in the second half of 2015.
They do not detract from the openness of the Green Belt.
 - The council's reports imply that the new development was an extra new build on green-field land – not reuse of the brownfield site. In fact planning was refused for the application to develop the green-field half of the owner's land.
 - The new development (French Fields) is one of the five national case studies as part of the government's home building fund.
<https://www.gov.uk/government/publications/home-building-fund-developer-case-studies>
- 6.3. The community that is directly affected by the removal of HA4 from the Green Belt – and its subsequent development - is predominantly rural, bounded by rural land, industry and a few residential areas that are classed as part of one of the most deprived areas in the UK.
The visiting public who have expectations from the Bold Forest Park are also significantly affected.
Thus the number of respondents and representations will be low.
- 6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.
- 6.3.2. At least one large property developer has procured a part of the land within HA4 already and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. The NPPF encourages the active engagement of such developers in such a way - also with agreements in principle.
- 6.3.3. This seems to make the process unreasonable and unfair.

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016.

2. Draft Green Belt Review (GBR) 2016:

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from 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 GBR scored each parcel against the Level of Significance of its Green Belt function for purposes 1, 2 and 3 only at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are “... *not necessarily inappropriate or irrelevant*” (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

Confusing and inaccurate identification:

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).
2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, **thus giving rise to it remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps, is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has concluded (as have many councils' LAPs) that the aging population will shift housing needs from family accommodation to more care homes and easily accessible housing for small or single person households. The majority of the land in Location 21/HS03 would not be suitable for development for this type of housing based on accessibility alone.

It is also difficult to justify removing the protection of Green Belt status now for potential future housing needs where so many of the socio-economic dependencies are in flux due to the effects of the wider political environment.

3.3 Meeting the requirements for Sustainability and/or Suitability for Development:

The NPPF requires that land identified for removal from the Green Belt is capable of being developed. There are numerous reasons that indicate Location 21/HS03 does not meet these requirements.

3.3.1 Protection against climate change/flood risk:

1. Much of the land within Location 21/HS03 is intersected with drains, small ponds and sinks (St. Helens Strategic Flood Risk Assessment (SFRA) 2014), most especially the land to the west of the bridleways SN| |311 and SN| |312, which bisect the location from north west to south east .
2. This has a significant impact on any development as increased hard landscaping would increase flood risk for existing properties and road networks that surround it as well as affecting new.
3. The level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP) would make development untenable.
4. Even though the SFRA identified multiple areas within Location 21/HS03 as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels in Location 21 in the GBR.

3.3.2 Ecology, Habitat and Biodiversity:

1. **Hedgerows** – including part of the old Parish boundary on SN| |307 – are precious resources and should be preserved and enhanced to encourage biodiversity. The western portion of Location 21/HS03 retains many of its hedgerows and the French Fields development has enhanced this network by planting new native hedging around its perimeter.
2. **LWS_108**: No case has been made to remove LWS_108 from the Green Belt, nor should it be, as it cannot be classed as development land for flood risk and ecological reasons.
3. Removing HS03 from the Green Belt would result in **LWS_108** becoming isolated, which is not a good outcome. It is suggested that not only does retaining the Green Belt at Location 21/HS03 creates a green corridor to the LWS from Clock Face Country Park, but also enhances its viability.
4. **Protecting UK Priority Species and Habitats**: During 2016, several breeding pairs of skylarks (*Alauda arvensis*) were witnessed in GBS_051. In addition, lapwings (*Vanellus vanellus*) were witnessed as nesting in GBS_120. Both of these are protected UK Priority Species.

5. **The NBN Gateway** shows that corn bunting (*Emberiza calandra*), skylark, lapwing, brown hare (*Lepus europaeus*) and great crested newt (*Triturus cristatus*) have been recorded in the vicinity of Location 21/HS03. It is fair to assume these UK Priority Species could be encouraged to flourish with proper management of the sites within Location 21/HS03. There are many records of urban birds in nearby Clock Face and three species of bat in the Country Park area.
6. There is no evidence of **Phase 1 Habitat survey data** beyond 2001 being used to assess the ecology within the whole LAP. As much has changed since then, it would be sensible to have these carried out on the parcels in Location 21. The habitats and findings to date would indicate that several UK Priority Species could be present.
7. Mitigation techniques for dealing with UK Priority Species and Habitats found, would again render development of the land for much of Location 21/HS03 as untenable, at the very least to the west of the bisecting bridleways.
8. From these findings alone, it could be argued that, at the very least, the area of Location 21/HS03 to the west of the bisecting bridleways should be managed as part of a mosaic habitat, providing habitats suitable for Priority Species (including undisturbed land) and linking across to the rest of the Green Belt. Extending the Bold Forest Park woodland by planting trees in [parts of] GBS_051 and/or GBS_120 could also be valid approach. This would give a belt of woodland across from the Country Park to the woodland in LWS_108. Any of these solutions allow a connecting green corridor to and from Clock Face Country Park.
9. This area is part of the Bold Forest Park and Mersey Forest initiatives and the Council has obligations to those.

3.3.3 Access to open spaces:

1. Location 21/HS03 is bisected south west to north east by the main footpath running along the parish boundary SN|308; has several other footpaths linking to this, SN|307, SN|314, SN|315 and SN|316; and bridleways that bisect the site from north west to south east, SN|311 and SN|312. These public rights of way give access to each of the surrounding settlements, to the Clock Face Country Park and wider countryside without needing to use the car. This is a key strategic aim in the LAP.
2. Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by this open countryside. It helps to create the ambiance of tranquillity before visitors enter the Park.

3.3.4 Other significant factors:

1. If Location 21/HS03 is removed from the Green Belt, it will amalgamate several settlements: Clock Face, Sutton Leach, Sutton, New Bold, Bold and Abbeyfield. This contravenes Purpose 2 of the Green belt Review.
2. The rural infrastructure (rural roads; Green Belt border to one side, intermittent housing on the other; lack of public transport, power and water) in the Gorsey Lane vicinity means it is not able to cope with additional population or traffic needs if any development for Location 21/HS103 is put forward.
3. The double line of electricity pylons running along the north western border of Location 21/HS03 will require space around them for maintenance access. They also influence the viability of development land around them.
4. As this is the area with heaviest pollution (noise and air quality, mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4. Conclusion/alternatives:

4.1 Option 1

The area identified as Location 21 in the GBR (with the possible exception of the area identified as HA6 in the LAP) should be reviewed as a whole (preferred option and stated as such at stage 4 of the GBR) **but absolutely should not be removed from Green Belt status, for the reasons defined above.** This would mitigate, to some extent, the removal of allocated employment land identified as EA1 (Appendix 15, LAP), and proposed safeguarded employment land identified as ES-01 and ES-02 (Appendix 16, LAP), from the south eastern area of the St Helen's Green Belt bordering the M62. This was identified as a necessary strategic requirement in the Employment Needs Study 2015 and the AECOM Local Plan Economic Evidence Base Paper (2015).

Much of the new housing allocation predictions are through expectations of housing requirements from the new employment. However, as the main allocation in question is at the south eastern edge of the Green Belt, and is along the M62 corridor on the very edge of the Warrington boundary (actually increasing sprawl), it is highly likely that much of the housing demand will be outside the St Helens jurisdiction.

A disproportionate amount of land is proposed to be removed from Green Belt in the southern area as opposed to other areas of the St Helens Green Belt, despite that going against the Bold Forest Park AAP and the Mersey Forest initiative. This area is integral to these initiatives, which the LAP states will not be affected. This will have a greatly detrimental impact on the landscape character of the area. In addition, the AAP makes recommendations to improve this area.

Removal of these areas of Green Belt significantly reduces the strategic gap between large towns of St Helens and Warrington.

Once these sites are removed from Green Belt, they will not be returned to it - so beyond 2034 they will not be protected. This is a dangerous proposition for such important land on a statistical projection rather than facts.

4.2 Option 2

As half of the parcel of land identified as GBS_119 in the GBR has been designated for removal from the Green Belt with immediate effect (HA6 in Appendix 11 of the LAP), and if there is a real perceived need for safeguarded housing allocation land AT THIS TIME, notwithstanding the other considerations, then an alternative compromise option could be considered.

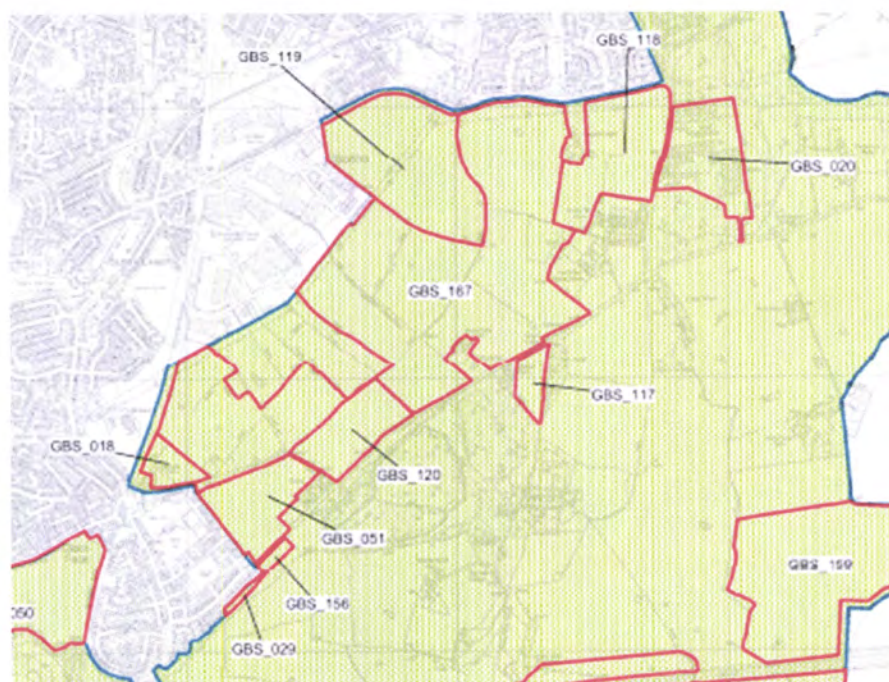
Parcels GBS_118, the remaining half of GBS_119 and the most north easterly parcel of GBS_162 in Location 21 could be examined independently as to their viability for development. If viable, these parcels could then be removed from the Green Belt into Safeguarded land, **leaving the remaining land within the Green Belt.**

This approach could be justified as:

1. There is a distinct and identifiable boundary for these parcels together - Reginald Road Industrial estate; B5204; Neills Road; footpath SN| |315 and the drain edging the south of GBS_119.
2. These parcels are close to all required sustainable infrastructure (rail, road networks, power and water).
3. Easy access to public transport.

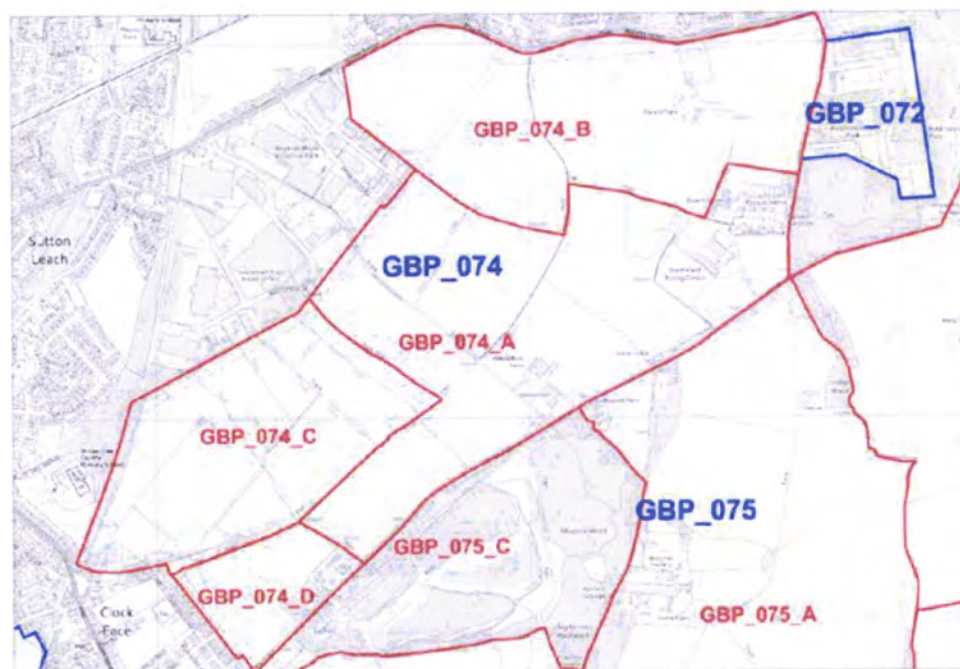
4. These parcels directly abut the B5204 and have no buildings close to the road on that boundary. Thus road networks are in place to deal with the volume of new traffic and can easily be adapted or extended to provide new access points to these land parcels.
5. Much less impact on combining settlements as fewer affected;
6. Many fewer watercourses, thus not as great, and therefore more manageable, impact on the ecology, climate change control and flood risk.
7. Retains a clear and simple boundary for the Green Belt and would not be classed as sprawl.
8. Retains much of the land to use for enhancing the landscape and environment, allowing the Council to meet many of their obligations in the Bold Forest Park AAP.
9. Retains the open landscape and green infrastructure, providing easy access between communities by existing footpaths and bridleways.
10. Addresses the potential isolation of LWS_108 and realistically retains it in the Green Belt.
11. Addresses many of the concerns identified in Option 1.

Appendix 1 – Maps of land parcels label changes between the 2016 proposals and the 2019 submission draft - to assist in the reading of this report



Above -
Detailed land parcels and sub-parcels in Location 21 – from promoted sites map 2016

And below:
Detailed land parcels and sub-parcels for GBP_074 from Page 345 of the Green Belt Review 2018



A report on the findings of a Partial Phase 1 habitat survey and three bat transects

for
LAND PARCEL GBP_74/HA4:

In the Green Belt Review 2018 and
The St Helens Local Plan 2020-2035 respectively

May 2019

Version history:

V1 Submitted May 2019

Author: Glenys McBain, BSc (Hons)

1 Executive summary

Many local residents are concerned that the council has decided to remove several parcels of land from the Green Belt, with the consequential loss of habitats and priority species, and of their own open space for wellbeing and recreational purposes.

In addition, the allocation of the land parcel covered in this report to housing with immediate effect has caused greater concern in a wider sense as to its appropriateness (and at such levels) in the locality.

When records were sought to identify land use and species present, it was discovered that many records are quite old. It was felt that up to date information was required to ensure accuracy of reporting.

Whilst this was a limited phase 1 survey, its findings show that:

- The green space is highly valued and well used by the local populace for its open space and landscape, its recreational and health use. It is a conduit between “villages” and other recreational spaces, and for walking, getting close to nature, dog walking and horse riding in their own right.
- Arable farming forms a significant portion of the 164 hectares or so of the land parcel (approximately 55%). Approximately 30% is permanent grassland (grazing land in the equestrian businesses, neutral grassland in the LWS, and some haylage), with the remainder as other habitats (woodland, hedge, ditches, ponds).
- The mosaic habitats of HA4 provide a significant green connection between Local Wildlife Sites (LWS), Local Nature Reserves (LNR) and other “green” areas, thus is of significant value to wildlife.
- HA4 is a commuting and foraging area for bats and raptors. Common Pipistrelle (*Pipistrellus pipistrellus*); Soprano Pipistrelle (*Pipistrellus pygmaeus*); Noctule (*Nyctalus noctula*); Buzzard (*Buteo buteo*) and Kestrel (*Falco tinnunculus*) were observed, although not in significant numbers. This could have been due to the exceptionally cold conditions on the survey dates. A hunting owl was also heard, but could not be definitively identified.
- Key Priority Species of Farmland birds are present and breeding in significant numbers over the whole site, Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*) and Snipe (*Gallinago gallinago*) in particular.
- The Regionally important species (North West Biodiversity Audit) English Comfrey (*Symphytum officinale*) is present scattered across the land parcel.
- The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds surrounded by mature deciduous trees. All the ditches observed had some standing water present.
- On a negative note, the western edge of GBP_074/HA4 is bounded by a disused railway line which is dominated by significant stands of Japanese Knotweed (*Fallopia japonica*) – many of which touch the boundary itself.
- Some fly tipping was observed to the north of the LWS and the boundary of Reginald Road/the industrial estate.

In summary then, this land parcel plays a significant role in the biodiversity of the area, the openness of the landscape and the health of its local population. Its loss would be significant.

2 Introduction to the surveys

In the eight week period between 31/03/2019 and 13/05/2019, a partial phase 1 habitat survey was undertaken on the land parcel known as HA4 in the St Helen’s Local Plan 2020-2035 and GBP_74 in the Green Belt Review 2018.

The purpose of the report was to record the current land use and species found in the land parcel as the council is proposing to remove this whole parcel from the Green Belt. Many existing records for this area are quite old, and it is felt that an up to date record is useful and necessary, especially as it pertains to the Bold Forest Park AAP (approved July 2017).

There is much concern within the local population that the character of the landscape will change to the detriment of their outlook, their mental health and their access to open space. In addition, many are concerned about the loss of wildlife and the effects on the environment that would result from the land use being changed to housing.

3 Methodology

3.1 Habitat surveys

Surveys were undertaken on the 30/03/2019, 08/04/2019, 20/04/2019, 07/05/2019 and 09/05/2019: to observe and record habitats and species from public rights of way (accessed from different locations).

Observations were collated, a list of species found created, a map created to show the habitats/land use within the land parcel and key biodiversity findings and observations noted.

Records will be submitted to the Merseyside Bio Bank project.

In addition, the surveys are to observe the existing public rights of way and their current use; negative impacts of invasive species and evidence of fly tipping.

3.2 Bat transect surveys

Three transect surveys were undertaken on the 30/03/2019, 21/04/2019 and 06/05/2019.

Data was collected and recorded using a variety of devices. The surveys were completed in line with the Bat Conservation Trust Good Practice Guidelines (Collins 2016).

Records will be submitted to the Merseyside Bio Bank project.

3.3 Limitations

Due to lack of time and access, the surveys were conducted by trained volunteers from public access footpaths that run through and across the land parcel, as well as observations from the surrounding roads and the disused railway line. Hence only partial data, though extensive, was able to be collected.

Due to lack of access, the citation and map for LWS_108 from 2016 (Merseyside Environmental Advisory Service) have been attached as complementary evidence to that collected during the surveys. *Where observation was not possible, their classification has been used to complete the habitat map.*

The site shows several habitat features that make it suitable for a range of mammals, reptiles and amphibians, including Water Vole (*Arvicola amphibius*) and Great Crested Newt (*Triturus cristatus*) that have previously been recorded here. This survey did not cover those aspects.

4 Findings

4.1 Main habitat classifications and findings;

The table in Appendix 1 shows the list of species found during the surveys. The maps in Appendix 3 show: the main findings for the habitat types observed during the surveys and a connectivity plan showing ecological pathways.

The field behind Gorsey Lane and Crawford Street (south west) shows overgrazing and poaching of the (semi-improved) grassland with 9 horses present at the time of survey. There is no evidence of the field being skipped out. This being noted, the tussocks of grass and vegetation appear to support breeding Lapwing (*Vanellus vanellus*) and Skylark (*Alauda arvensis*).

Not all the fields of Tunstalls Farm (a livery stable business to the north west) were easy to see, but they all appear to be permanent (semi-improved) grassland grazed by horses. They show good management with no overgrazing evident and fields being used in rotation. The rest of this land is neutral and marshy grassland that makes up LWS_108. The LWS is covered separately in 4.4.

The section of old parish boundary between the land parcels above has mature trees (mainly Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*), with some Hawthorn (*Crataegus monogyna*), Wild Cherry (*Prunus avium*), Sycamore (*Acer pseudoplatanus*), Hazel (*Corylus avellana*) and Elder (*Sambucus nigra*). There are two sections of fenced land in the area where the footpath exits the land parcel to the west. One has a marshy character, the other more ruderal.

All of the arable fields (cereal crops this year) appear to have a 3 – 5m arable margin of grassland. High numbers of farmland bird species (see 4.2) were present in these fields, especially Skylark (*Alauda arvensis*).

As expected, the highest floral diversity was present in the field margins, ditches and woodland habitats. There are many scattered ponds over the site, the majority of which are surrounded by mature trees. All ditches had some standing water, with more ditches present than anticipated following the desk study. The intact hedgerows present on site appear to support a wide range of smaller bird species despite being species poor with Hawthorn (*Crataegus monogyna*) dominant.

Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*) continue to dominate the woodlands, although Alder (*Alnus glutinosa*) is frequent in the wet woodland at the north of the LWS.

One Regionally Important Plant Species that was found scattered across the whole land parcel was English or Common Comfrey (*Symphytum officinale*).

4.2 Key data for Farmland birds

The table in Appendix 1 shows the findings for the bird species observed during the surveys. Several breeding pairs of key farmland birds were observed, the following being of particular import:

Taxon name	Common Name	Notes
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs especially on the arable fields.
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs especially on the grassland.

4.3 Key data for Bats

The following table and survey maps in Appendix 2 show the dates and locations for the bat species recorded during the transect surveys.

Taxon name	Common Name	Notes
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences
<i>Nyctalus noctula</i>	Noctule	Single occurrence

The first transect was abandoned within 30 minutes as the temperature dropped to 2°C and would not have given valid data. Even so, the sightings were of the same species and in the same locations as in the first part of the subsequent transects – and transect three as a whole.

The bats showed in smaller numbers than expected but this could have been due to the unusually cold evenings this spring.

4.4 Local Wildlife Site (LWS_108)

Observations were made from the footpaths at the south and east, thus significant areas could not be observed even with binoculars due to the trees and hedges in the interior.

The citation and map from 2016 (Merseyside Environmental Advisory Services through Merseyside Bio-Bank Services) are included as Appendix 5 to help remedy this.

There was no management plan with the citation but it was noted that the species rich eastern field was showing significant succession growth (by Goat Willow (*Salix caprea*) in particular) and this will need to be controlled to keep the site's main BAP habitats as neutral grassland/marshy grassland.

The minimal horse grazing on other parts of the site appears to be working well.

4.5 Other important observations

All of the public footpaths through and across the land parcel show evidence of high usage by pedestrians - dog walkers in particular.

The central north/south footpath/bridleway was mown on the final visit, presumably to improve access and this is helpful.

The whole site has a pleasing open aspect with views across to Winter Hill.

The disused railway line that borders the site on the north-west is dominated by large stands of Japanese Knotweed (*Fallopia japonica*), in places touching the boundary. This is a significant problem as the pathway is well used and it could spread rapidly.

There is evidence of fly tipping on the north edge of the LWS. This is not extensive, but unsightly. Measures have been taken to reduce this with signs saying "NO TIPPING" and "24 hour CCTV in place". Otherwise tipping and litter are minimal.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5 Appendices

5.1 Appendix 1

Species List in table format.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Acer campestre</i>	Field Maple	<i>Glyceria fluitans</i>	Floating Sweet Grass
<i>Acer pseudoplatanus</i>	Sycamore	<i>Hedera helix</i>	Ivy
<i>Aegopodium podagraria</i>	Ground Elder	<i>Heracleum sphondylium</i>	Hogweed
<i>Aesculus hippocastanum</i>	Horse Chestnut (seedling)	<i>Holcus lanatus</i>	Yorkshire Fog
<i>Agrostis stolonifera</i>	Creeping Bent	<i>Holcus mollis</i>	Creeping Soft Grass
<i>Ajuga reptans</i>	Bugle	<i>Hyacinthoides x massartiana</i>	Bluebells (hybrid)
<i>Alisma plantago-aquatica</i>	Alder	<i>Ilex aquifolium</i>	Holly
<i>Alisma plantago-aquatica</i>	Water Plantain	<i>Iris pseudacorus</i>	Yellow (Flag) Iris
<i>Alliaria petiolata</i>	Garlic Mustard	<i>Juncus conglomeratus</i>	Compact Rush
<i>Allium ursinum</i>	Wild Garlic (Ramsons)	<i>Juncus effusus</i>	Soft Rush
<i>Alnus glutinosa</i>	Alder	<i>Juncus inflexus</i>	Hard Rush
<i>Alopecurus pratensis</i>	Meadow Foxtail	<i>Lamium album</i>	White Dead-nettle
<i>Angelica sylvestris</i>	Angelica	<i>Lamium purpureum</i>	Red Dead-nettle
<i>Anisantha sterilis</i>	Barren Brome	<i>Lathyrus pratensis</i>	Meadow Vetchling
<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass	<i>Leucanthemum vulgare</i>	Oxeye Daisy
<i>Anthriscus sylvestris</i>	Cow Parsley	<i>Lolium perenne</i>	Rye Grass
<i>Apium nodiflorum</i>	Fool's-water-cress	<i>Lonicera periclymenum</i>	Honeysuckle
<i>Arrhenatherum elatius</i>	False Oat Grass	<i>Lotus corniculatus</i>	Birds Foot Trefoil
<i>Artemisia vulgaris</i>	Mugwort	<i>Lupinus sps</i>	Lupin (garden escape)
<i>Bellis perennis</i>	Daisy	<i>Lythrum salicaria?</i>	Purple Loosestrife?
<i>Betula pendula</i>	Silver Birch	<i>Malus sylvestris</i>	Crab Apple
<i>Brassica napus</i>	Oil-seed Rape	<i>Matricaria discoidea</i>	Pineapple weed
<i>Calystegia silvatica</i>	Large Bindweed	<i>Mentha aquatica</i>	Water Mint
<i>Cardamine flexuosa</i>	Hairy Bittercress	<i>Myosotis scorpiodes</i>	Water Forget-me-not
<i>Cardamine pratense</i>	Cuckoo flower	<i>Narcissus sps</i>	Daffodil (garden escape)
<i>Carex canescens?</i>	White Sedge?	<i>Oenanthe crocata</i>	Hemlock Water Dropwort
<i>Carex pendula</i>	Pendulous Sedge	<i>Pentaglottis sempervirens</i>	Green Alkanet
<i>Centaurea nigra</i>	Knapweed	<i>Phalaris arundinacea</i>	Reed Canary Grass
<i>Cerastium fontanum</i>	Common Mouse-ear	<i>Plantago lanceolata</i>	Ribwort Plantain
<i>Chamerion angustifolium</i>	Rosebay Willowherb	<i>Plantago major</i>	Greater Plantain
<i>Cirsium arvense</i>	Creeping Thistle	<i>Poa annua</i>	Annual Meadow Grass
<i>Cirsium palustre</i>	Marsh Thistle	<i>Poa trivialis</i>	Rough Meadow Grass
<i>Cirsium vulgare</i>	Spear Thistle	<i>Potentilla anserina</i>	Silverweed
<i>Cornus sanguinea</i>	Dogwood	<i>Potentilla reptans</i>	Creeping Cinquefoil
<i>Corylus avellana</i>	Hazel	<i>Prunus avium</i>	Wild Cherry
<i>Crataegus monogyna</i>	Hawthorn	<i>Prunus spinosa</i>	Blackthorn
<i>Dactylis glomerata</i>	Cocksfoot	<i>Pteridium aquilinum</i>	Bracken
<i>Deschampsia cespitosa</i>	Tufted Hair Grass	<i>Quercus robur</i>	Oak
<i>Deschampsia flexuosa</i>	Wavy Hairgrass	<i>Ranunculus acris</i>	Meadow Buttercup
<i>Digitalis purpurea</i>	Foxglove	<i>Ranunculus repens</i>	Creeping Buttercup
<i>Dipsacus fullonum</i>	Teasel	<i>Rosa arvensis</i>	Field Rose
<i>Dryopteris dilatata</i>	Broad Buckler Fern	<i>Rosa canina</i>	Dog Rose
<i>Dryopteris filix-mas</i>	Male Fern	<i>Rosa rugosa</i>	Hedge Rose (garden escape)
<i>Elytrigia repens</i>	Common Couch	<i>Rubus sps</i>	Bramble
<i>Epilobium hirsutum</i>	Greater Willowherb	<i>Rumex acetosa</i>	Common Sorrel
<i>Epilobium montanum</i>	Broad Leaved Willowherb	<i>Rumex crispus</i>	Curl'd Dock
<i>Equisetum arvense</i>	Field Horsetail	<i>Rumex obtusifolius</i>	Broad-Leaved Dock
<i>Equisetum fluviatile</i>	Water Horsetail	<i>Rumex sanguineus</i>	Wood Dock
<i>Euonymus europaea</i>	Spindle Tree	<i>Salix caprea</i>	Goat Willow
<i>Festuca rubra</i>	Red Fescue	<i>Salix fragilis</i>	Crack Willow
<i>Ficaria verna</i>	Celandine	<i>Sambucus nigra</i>	Elder
<i>Filipendula ulmaria</i>	Meadowsweet	<i>Scrophularia auriculata</i>	Water Figwort
<i>Fraxinus excelsior</i>	Ash	<i>Senecio jacobaea</i>	Common Ragwort
<i>Fumaria officinalis</i>	Common Fumitory	<i>Senecio vulgaris</i>	Groundsel
<i>Galium aparine</i>	Cleavers	<i>Silene dioica</i>	Red Campion
<i>Geranium pyrenaicum</i>	Hedgerow Cranes-bill (garden escape?)	<i>Sisymbrium officinale</i>	Hedge Mustard
<i>Geranium robertianum</i>	Herb Robert	<i>Solidago canadensis</i>	Goldenrod (garden escape)
<i>Geum urbanum</i>	Wood Avens	<i>Sonchus asper</i>	Prickly Sow Thistle

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Sorbus aucuparia</i>	Rowan	<i>Tussilago farfara</i>	Coltsfoot
<i>Stellaria holostea</i>	Greater Stitchwort	<i>Typha latifolia</i>	Reed Mace
<i>Stellaria media</i>	Chickweed	<i>Urtica dioica</i>	Common Nettle
<i>Symphytum officinale</i>	Common Comfrey	<i>Veronica polita</i>	Grey Field Speedwell
<i>Symphytum x uplandicum</i>	Russian Comfrey	<i>Viburnum opulus</i>	Guelder Rose
<i>Taraxacum officinale</i>	Dandelion	<i>Vicia cracca</i>	Tufted Vetch
<i>Trifolium dubium</i>	Lesser Trefoil	<i>Vicia hirsuta</i>	Hairy Tare
<i>Trifolium pratense</i>	Red Clover	<i>Vicia sativa</i>	Common Vetch
<i>Trifolium repens</i>	White Clover	<i>Vicia sepium</i>	Bush Vetch
<i>Tripleurospermum inodorum</i>	Scentless Mayweed		

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aegithalos caudatus</i>	Long-tailed tit	
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs
<i>Anas platyrhynchos</i>	Mallard	(pair)
<i>Buteo buteo</i>	Buzzard	
<i>Carduelis carduelis</i>	Goldfinch	flock of 8
<i>Columba palumbus</i>	Wood Pigeon	several
<i>Corvus corone</i>	Carrion Crow	
<i>Cyanistes caeruleus</i>	Blue tit	
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Erithacus rubecula</i>	Robin	
<i>Falco tinnunculus</i>	Kestrel	
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Hirundo rustica</i>	Swallow	
<i>Parus major</i>	Great tit	
<i>Passer domesticus</i>	House Sparrow	several -including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Periparus ater</i>	Coal tit	
<i>Phasianus colchicus</i>	Pheasant	
<i>Phylloscopus collybita</i>	ChiffChaff	(several)
<i>Pica pica</i>	Magpie	
<i>Sturnus vulgaris</i>	Starling	
<i>Sylvia communis</i>	Whitethroat	
<i>Troglodytes troglodytes</i>	Wren	
<i>Turdus merula</i>	Blackbird	several
<i>Turdus viscivorus</i>	Mistle Thrush	
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aglais io</i>	Peacock Butterfly	
<i>Anthocharis cardamines</i>	Orange Tip Butterfly	
<i>Bombus lapidarius</i>	Red-tailed Bumble	
<i>Bombus lucorum</i>	White tailed Bumble Bee	
<i>Coccinella magnifica</i>	Ladybird	
<i>Pararge aegeria</i>	Speckled Wood Butterfly	
<i>Pieris rapae</i>	Small White Butterfly	

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Nyctalus noctula</i>	Noctule	Single occurrence
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Oryctolagus cuniculus</i>	Rabbit	

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.2 Appendix 2

Map of GBP_74/HA4 showing transect route and bats recorded

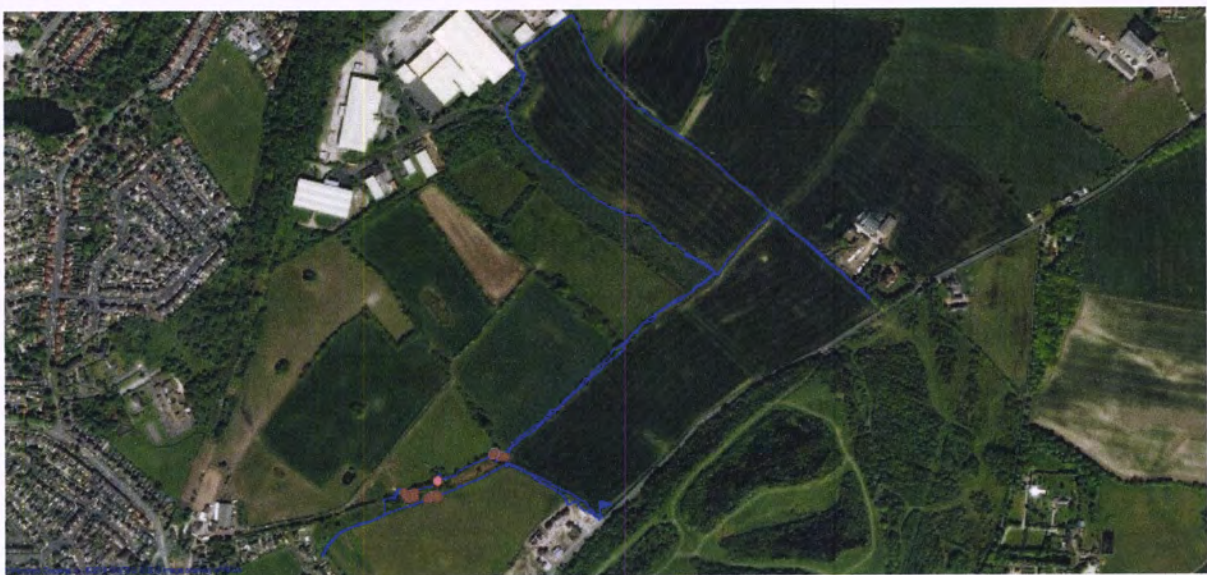
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Results of the two successful bat transects:



Mapping of the results from the bat transect number 2 on 21/04/2019



*Mapping of the results from the bat transect 06/05/2019
showing Common Pipistrelle (Pipistrellus pipistrellus) in red and Soprano Pipistrelle (Pipistrellus pygmaeus) in orange*

Note: The results of the last transect (06/05/2019) are very similar to the findings during the abandoned transect (30/03/2019) where the results were not recorded.

In both cases the temperature was very low (2°C in the abandoned; down to 7°C in the last).

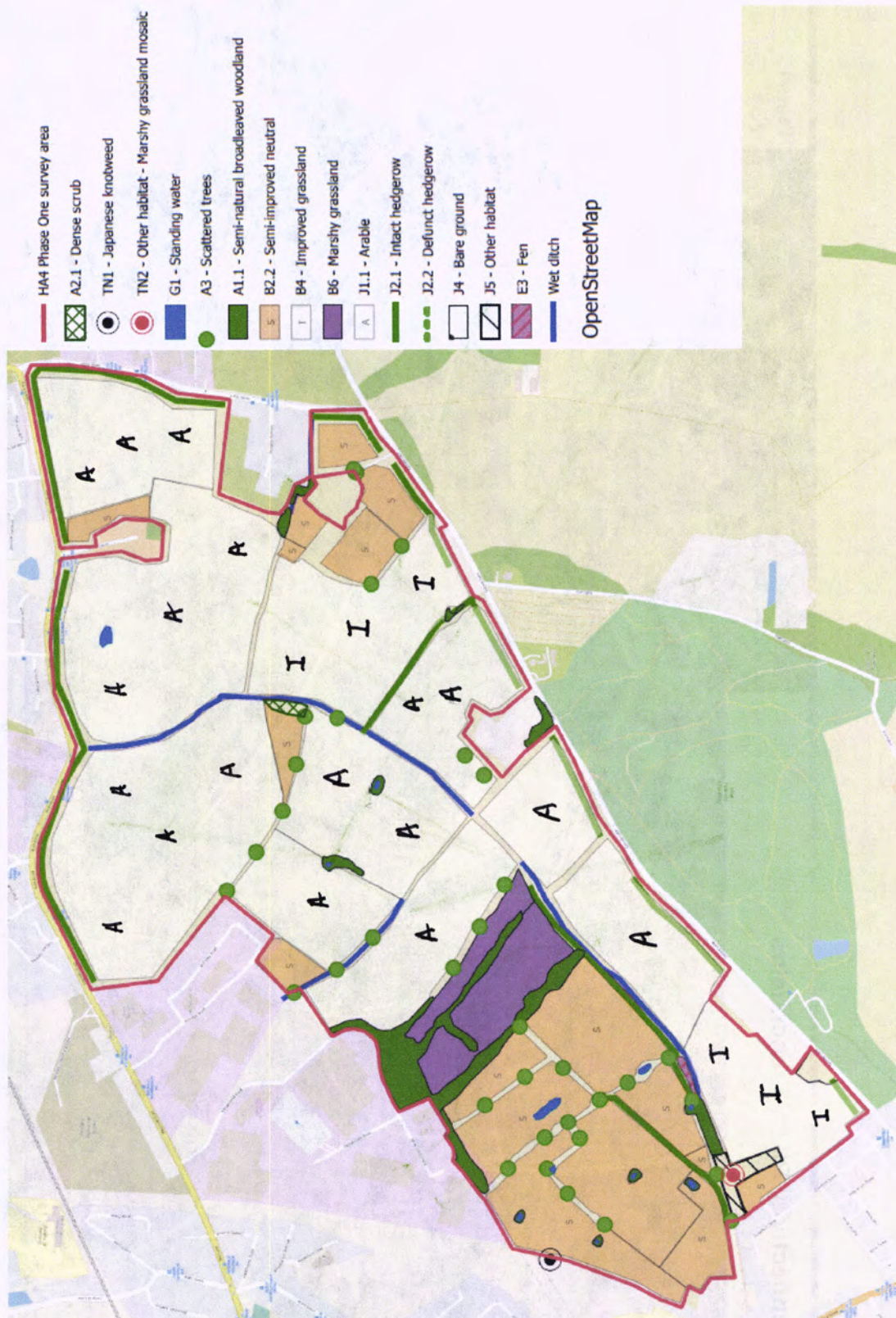
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.3 Appendix 3

Phase 1 Habitat Map of GBP_74/HA4
And
Connectivity Plan for GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.4 Appendix 4

Photos taken during Phase 1 survey of GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



View south across Tunstalls Farm from disused railway line



View north across Tunstalls Farm from old parish boundary



Looking towards Clock Face Country Park from old parish boundary



One of many ponds on site



Looking north across the LWS grassland



Eastern field of LWS

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Looking north from LWS across arable fields



Looking north east across arable fields from central footpath



Stands of Japanese Knotweed at the western boundary



Horses grazing at Tunstalls Farm



View north east over arable land



View north over arable fields

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.5 Appendix 5

The Citation for LWS_108 Tunstalls Farm (2016)
and
The Map for LWS_108 Tunstalls Farm (2016)

*(supplied by Merseyside Environmental Advisory Service
through Merseyside Bio-Bank Services)*

Site Name: Tunstall's Farm (formerly Field north of Gorsey Lane)

Site Area: 15.05 hectares **National Grid Reference:** SJ534921

Date of Designation: April 1994 (part) **District:** St. Helens

Date of Last Revision: September 2016 **Local Wildlife Site Number:** 108

CITATION: A group of small agricultural fields with an extensive ditch and hedgerow network. The field is now under Environmental Stewardship and is developing into a species rich meadow including, regionally and locally important species. The ponds and ditches on site provide habitat for water vole and great crested newts.

APPRAISAL: This site has been evaluated against the guidelines approved by the Council for selection of Local Wildlife Sites. The site's evaluation against the guidelines is set out below.

Guideline		Comment
HABITATS		
H1; H2; H3; H4.	Rarity Diversity Nearness Isolation	1 priority BAP habitat; 3 regionally important habitats. 11 habitats recorded. 31 sites within 1Km. --
PLANTS		
SP1; SP2; SP3; SP4.	Rarity Diversity Naturalness Nationally Rare	1 regionally important species; 1 locally rare species. Total of 74 plant species. 95.95% of the plants are native to the borough. Colonisation has been aided by man and the site has been physically altered. --
ANIMALS		
General SP5; Birds B1; B2; B3; B4; B5.	Rare/priority Non-breeding population Breeding population Regional rare/scare Breeding assemblage Assemblage, breeding, wintering, passage.	-- -- -- -- -- --
Dragonflies Od1. Od2. Butterflies Bf1; Bf2.	Breeding Regional rare/scarc Region rare breeding Breeding assemblage	-- -- -- --
Amphibians A1; A2. Reptiles R1; R2; Bats Bat1; Bat2.	Rarity Exceptional populations Population of native species. Exceptional population Roost Assemblage	Guideline met – Great crested newt -- -- --
Mammals Mam1.	Breeding	Guideline met – Water vole.

SUMMARY: The combination of these factors has led to this site being identified as a Local Wildlife Site.

NOTE: Validated data from 1981 to September 2016 have been used in this assessment. Other data may become available to support this designation.

Status of species of nature conservation importance

Habitats

1 Priority BAP habitat	Unimproved neutral grassland
3 Regionally important habitats (North West Biodiversity Audit)	Unimproved neutral grassland Marshy grassland Standing water

Plants

1 Regionally important species (North West Biodiversity Audit)	Common comfrey (<i>Symphytum officinale</i>)
1 Locally rare species	Fen Bedstraw (<i>Galium uliginosum</i>)

Animals

Amphibians

1 Habitats Regulations 2010 – Schedule 2 species	Great crested newt (<i>Triturus cristatus</i>)
1 Wildlife and Countryside Act – Schedule 5 species	

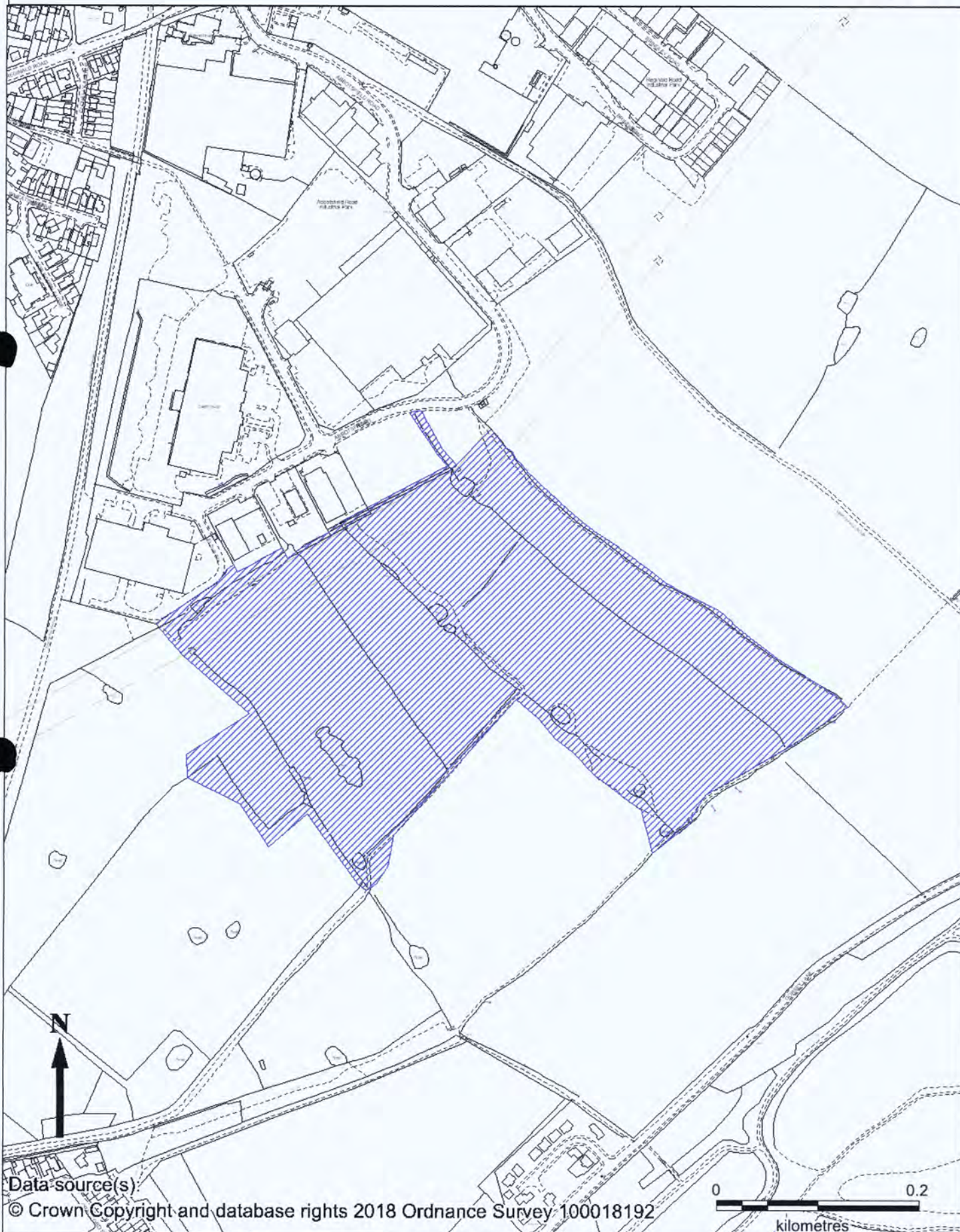
Mammals

1 Wildlife and Countryside Act – Schedule 5 species	Water vole (<i>Arvicola terrestris</i>)
--	---

Local Wildlife Site 108
Tunstalls Farm
Scale: 1:2500



Merseyside
Environmental
Advisory Service



Data source(s)

© Crown Copyright and database rights 2018 Ordnance Survey 100018192

0 0.2
kilometres

RO0675



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).

1429
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: John	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address: Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/5/19
-----------------------	---------------

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.

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	LPC08	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 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 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

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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal from Green Belt of land parcel H44/CBL-074 and its allocation for housing as we believe the Council's ~~original~~ position is flawed.

All the arguments we wish to put forward are within the attached documents: Assessment of the St Helen's Local Plan and Green Belt Review and a Phase 1 habitat survey.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

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 LPA09		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 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 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.

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Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

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Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.
We wish to put forward arguments against the removal of green belt of land parcel HA4/GBP_074 and its allocation for housing as we believe the council's position is flawed, all the arguments we wish to put forward are within the attached document. Which is a assessment of the St Helens local plan and green belt review and phase one habitats ^{survey}

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
--	--

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

Policy <i>LP206</i>	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 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 checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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Please continue on a separate sheet if necessary

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

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

Policy <i>LPC OS</i>	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 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 checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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All the arguments we wish to be put forward are within the attached documents:

Assessment of the St Helens Local Plan and Green Belt Review and the Phase 1 habitat survey.

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

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

Assessment of the St Helen's Local Plan and Green Belt Review

A report on behalf of the residents/owners of the
French Fields development, Clock Face
January 2017 and May 2019

13 MAY 2019

Version history:

- V1 Submitted January 2017
- V2 Re-submitted January 2017 with minor orientation corrections
- V3 March 2019:
 - a) *Cover page, and Foreword and Additions for the March/May 2019 representation added*
- V4 March 2019: Formatting and proofing corrections
- V5 May 2019:
 - a) *Updated to refer to records from Merseyside Bio-Bank and to include the citation for LWS_108*
 - b) *Updated to include results and observations from a Phase 1 habitat and bat transect surveys – added as Appendix*
 - c) *Added maps to show the differences in land parcel labelling as an Appendix. This is to assist in the reading of this report as land parcel labels have changed completely.*

Author: Glenys McBain, BSc (Hons)

Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."
 - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
"Likely to generate negative effects" for
 SA1. To protect and enhance biodiversity
 SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

-
- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document. 02

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- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03
This is significant.

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- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise. 04
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2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
- 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use. 05
- 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
- 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
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3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

- 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

"Likely to promote positive effects "

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."

It also scores SA5 using similar designations at several other land parcels for similar reasons.

However:

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- 3.2. There are no recommendations as to how this could be achieved.
-
- 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
- 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS. 06
- 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.
-
- 3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).
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- 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore: 07
- Removing HA4 from Green Belt increases risk to its GI;
 - Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole 08
 - The remaining Bold Forest Park GI does not have infinite capacity.
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- 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09
-
- 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
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4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;
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- 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
- 4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub. 10
- 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park.
- 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.
-
5. The Bold Forest Park AAP (adopted July 2017) states that:

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

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- 5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11
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- 5.2. The AAP recognises that *"There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."*

- However, these properties surround and/or are part of GBP_074/HA4.
 - Removal of HA4 from the Green Belt and its consequential development directly affects these establishments. 12
 - The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
 - The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.
-

- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *"Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."*
- The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *"3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park..."* 13

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

- 6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

- 6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it "...has a strong boundary to the east ..." "...includes old coal mining buildings..." "...and a new development..." 14

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer's side of the footpath, there is a ditch.
-

- The derelict coal mining buildings (an eyesore that had been used by light industry for several years before being abandoned) were demolished in March 2015 to make way for the new development referred to in the reports – that of French Fields. The first foundations were laid in the second half of 2015.
They do not detract from the openness of the Green Belt.
- The council's reports imply that the new development was an extra new build on green-field land – not reuse of the brownfield site. In fact planning was refused for the application to develop the green-field half of the owner's land.
- The new development (French Fields) is one of the five national case studies as part of the government's home building fund.
<https://www.gov.uk/government/publications/home-building-fund-developer-case-studies>

6.3. The community that is directly affected by the removal of HA4 from the Green Belt – and its subsequent development – is predominantly rural, bounded by rural land, industry and a few residential areas that are classed as part of one of the most deprived areas in the UK. The visiting public who have expectations from the Bold Forest Park are also significantly affected. Thus the number of respondents and representations will be low.

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6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.

6.3.2. At least one large property developer has procured a part of the land within HA4 already and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. The NPPF encourages the active engagement of such developers in such a way – also with agreements in principle.

6.3.3. This seems to make the process unreasonable and unfair.

Assessment of the Local Plan and Green Belt Review, a report on behalf of the residents of French Fields, January 2017

1. Purpose of the report:

This report has been compiled during January 2017 for the owners of the French Fields, Gorsey Lane to assist them as they evaluate the evidence and impact (pertaining to this development and the local area) of the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016.

2. Draft Green Belt Review (GBR) 2016:

2.1 Summary of how the assessment was done:

The five purposes for including land within the Green Belt as stated in section 9, paragraph 80 of the National Planning Policy Framework (NPPF) 2012 are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from 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 GBR scored each parcel against the Level of Significance of its Green Belt function for purposes 1, 2 and 3 only at:

- Low; Medium; High; and High + (where more than one purpose is high)

The reasons given for not including purposes 4 and 5 are:

- Purpose 4 – there are no such historic towns;
- Purpose 5 - is seen as a foregone conclusion that St Helens have this as priority.

2.2 Observations:

2.2.1 Inclusion of purpose 4:

It should be argued that purpose 4 does apply to the southern area of green belt, especially to that included in the Bold Forest Park Area Action Plan (AAP). The Bold[e] Hall and Parkland connection (stretching back to the 11th century) and the coal mining industry of the 20th century are particularly important in the shaping and future direction of this area. Many councils interpret purpose 4 as pertaining purely to historic towns (using Chester as an example). The Inspector believes that other reasons are “... *not necessarily inappropriate or irrelevant*” (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

2.2.2 Desk Study:

It can also be argued that the desk study, report and assessment of the land parcels within the area identified as Location 21 in the GBR and subsequently as HS03 in the LAP are flawed.

Confusing and inaccurate identification:

1. The parcel of land identified as GBS_167 in Appendix 5 (map of proposed changes) does not exist in any other document. However, it appears to be part of parcels (plural) referred to as GBS_162 in Appendix 4 (site specific assessments carried forward to stage 3 and 4).
2. Appendix 4 assesses the Location 21 parcels as GBS_018; GBS_051; GBS_118; GBS_119; GBS_120; and GBS_162. The individual assessments state they should be considered with others, but the referral identifiers and hierarchies are not consistent across the Stage 4 site summaries.

Methodology:

1. Parcel GBS_162 covers a large acreage, yet is being assessed against small parcels such as GBS_051, GBS_120 and GBS_018.
2. GBS_162 comprises a large area of arable land and a small area of permanent pasture, which is totally separated from it. Thus these, at least, should have been separated out for assessment purposes.
3. LWS_108 has been ignored from assessment completely, **thus giving rise to it remaining in Green Belt as an isolated pocket away from the main Green Belt** – which is not how it is depicted in any part of the GBR or the LAP.
4. Most of the assessments for the sites within Location 21 at stages 3A through 3C are lacking and/or inaccurate, thus concluding that sites are viable for development when most are obviously not – for reasons given further on in this report.

Assessing the parcels as a whole:

1. If the inaccuracies are ignored and the recommendation to consider Location 21 as a whole is followed, the scoring of the impact against the purposes for Location 21 becomes:

Purpose 1	Purpose 2	Purpose 3	Purpose 4
Low	High	High	Medium
Overall score:		High +	

2.3 Response to the GBR:

Overall then, the conclusion that these sites within Location 21 should be removed from the Green Belt cannot be justified - even from the Review's findings.

3. Other Considerations and Observations:

3.1 Removing Agricultural Land from Green Belt:

The vast majority of the land in Location 21 is farmland, of which about 1/2 is arable and the remaining 1/2 permanent pasture with some woodland and grassland.

In addition to their contribution to the farming economy and food production in the UK, these areas provide mixed habitat for many species, including UK Priority Species (see section 3.3.3 on ecology). Some are UK Priority Habitats in themselves. LWS_108, which was ignored in the GBR and LAP maps, is likely to be one such.

Various Green Belt review outcomes have shown that housing and economic needs are insufficient reason to remove agricultural land from the Green Belt (Warrington Borough Council, Green Belt Assessment, Final Report, October 2016).

3.2 Justifying housing needs to remove land from Green Belt:

The LAP has considered its housing requirements for the future using (among other sources) projections from their Strategic Housing Land Availability Assessment (SHLAA) 2016 . It has concluded (as have many councils' LAPs) that the aging population will shift housing needs from family accommodation to more care homes and easily accessible housing for small or single person households. The majority of the land in Location 21/HS03 would not be suitable for development for this type of housing based on accessibility alone.

It is also difficult to justify removing the protection of Green Belt status now for potential future housing needs where so many of the socio-economic dependencies are in flux due to the effects of the wider political environment.

3.3 Meeting the requirements for Sustainability and/or Suitability for Development:

The NPPF requires that land identified for removal from the Green Belt is capable of being developed. There are numerous reasons that indicate Location 21/HS03 does not meet these requirements.

3.3.1 Protection against climate change/flood risk:

1. Much of the land within Location 21/HS03 is intersected with drains, small ponds and sinks (St. Helens Strategic Flood Risk Assessment (SFRA) 2014), most especially the land to the west of the bridleways SN| |311 and SN| |312, which bisect the location from north west to south east .
2. This has a significant impact on any development as increased hard landscaping would increase flood risk for existing properties and road networks that surround it as well as affecting new.
3. The level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP) would make development untenable.
4. Even though the SFRA identified multiple areas within Location 21/HS03 as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels in Location 21 in the GBR.

3.3.2 Ecology, Habitat and Biodiversity:

1. **Hedgerows** – including part of the old Parish boundary on SN| |307 – are precious resources and should be preserved and enhanced to encourage biodiversity. The western portion of Location 21/HS03 retains many of its hedgerows and the French Fields development has enhanced this network by planting new native hedging around its perimeter.
2. **LWS_108**: No case has been made to remove LWS_108 from the Green Belt, nor should it be, as it cannot be classed as development land for flood risk and ecological reasons.
3. Removing HS03 from the Green Belt would result in **LWS_108** becoming isolated, which is not a good outcome. It is suggested that not only does retaining the Green Belt at Location 21/HS03 creates a green corridor to the LWS from Clock Face Country Park, but also enhances its viability.
4. **Protecting UK Priority Species and Habitats**: During 2016, several breeding pairs of skylarks (*Alauda arvensis*) were witnessed in GBS_051. In addition, lapwings (*Vanellus vanellus*) were witnessed as nesting in GBS_120. Both of these are protected UK Priority Species.

5. **The NBN Gateway** shows that corn bunting (*Emberiza calandra*), skylark, lapwing, brown hare (*Lepus europaeus*) and great crested newt (*Triturus cristatus*) have been recorded in the vicinity of Location 21/HS03. It is fair to assume these UK Priority Species could be encouraged to flourish with proper management of the sites within Location 21/HS03. There are many records of urban birds in nearby Clock Face and three species of bat in the Country Park area.
6. There is no evidence of **Phase 1 Habitat survey data** beyond 2001 being used to assess the ecology within the whole LAP. As much has changed since then, it would be sensible to have these carried out on the parcels in Location 21. The habitats and findings to date would indicate that several UK Priority Species could be present.
7. Mitigation techniques for dealing with UK Priority Species and Habitats found, would again render development of the land for much of Location 21/HS03 as untenable, at the very least to the west of the bisecting bridleways.
8. From these findings alone, it could be argued that, at the very least, the area of Location 21/HS03 to the west of the bisecting bridleways should be managed as part of a mosaic habitat, providing habitats suitable for Priority Species (including undisturbed land) and linking across to the rest of the Green Belt. Extending the Bold Forest Park woodland by planting trees in [parts of] GBS_051 and/or GBS_120 could also be valid approach. This would give a belt of woodland across from the Country Park to the woodland in LWS_108. Any of these solutions allow a connecting green corridor to and from Clock Face Country Park.
9. This area is part of the Bold Forest Park and Mersey Forest initiatives and the Council has obligations to those.

3.3.3 Access to open spaces:

1. Location 21/HS03 is bisected south west to north east by the main footpath running along the parish boundary SN| |308; has several other footpaths linking to this, SN| |307, SN| |314, SN| |315 and SN| |316; and bridleways that bisect the site from north west to south east, SN| |311 and SN| |312. These public rights of way give access to each of the surrounding settlements, to the Clock Face Country Park and wider countryside without needing to use the car. This is a key strategic aim in the LAP.
2. Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by this open countryside. It helps to create the ambiance of tranquillity before visitors enter the Park.

3.3.4 Other significant factors:

1. If Location 21/HS03 is removed from the Green Belt, it will amalgamate several settlements: Clock Face, Sutton Leach, Sutton, New Bold, Bold and Abbeyfield. This contravenes Purpose 2 of the Green belt Review.
2. The rural infrastructure (rural roads; Green Belt border to one side, intermittent housing on the other; lack of public transport, power and water) in the Gorsey Lane vicinity means it is not able to cope with additional population or traffic needs if any development for Location 21/HS103 is put forward.
3. The double line of electricity pylons running along the north western border of Location 21/HS03 will require space around them for maintenance access. They also influence the viability of development land around them.
4. As this is the area with heaviest pollution (noise and air quality, mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

4. Conclusion/alternatives:

4.1 Option 1

The area identified as Location 21 in the GBR (with the possible exception of the area identified as HA6 in the LAP) should be reviewed as a whole (preferred option and stated as such at stage 4 of the GBR) **but absolutely should not be removed from Green Belt status, for the reasons defined above.** This would mitigate, to some extent, the removal of allocated employment land identified as EA1 (Appendix 15, LAP), and proposed safeguarded employment land identified as ES-01 and ES-02 (Appendix 16, LAP), from the south eastern area of the St Helen's Green Belt bordering the M62. This was identified as a necessary strategic requirement in the Employment Needs Study 2015 and the AECOM Local Plan Economic Evidence Base Paper (2015).

Much of the new housing allocation predictions are through expectations of housing requirements from the new employment. However, as the main allocation in question is at the south eastern edge of the Green Belt, and is along the M62 corridor on the very edge of the Warrington boundary (actually increasing sprawl), it is highly likely that much of the housing demand will be outside the St Helens jurisdiction.

A disproportionate amount of land is proposed to be removed from Green Belt in the southern area as opposed to other areas of the St Helens Green Belt, despite that going against the Bold Forest Park AAP and the Mersey Forest initiative. This area is integral to these initiatives, which the LAP states will not be affected. This will have a greatly detrimental impact on the landscape character of the area. In addition, the AAP makes recommendations to improve this area.

Removal of these areas of Green Belt significantly reduces the strategic gap between large towns of St Helens and Warrington.

Once these sites are removed from Green Belt, they will not be returned to it - so beyond 2034 they will not be protected. This is a dangerous proposition for such important land on a statistical projection rather than facts.

4.2 Option 2

As half of the parcel of land identified as GBS_119 in the GBR has been designated for removal from the Green Belt with immediate effect (HA6 in Appendix 11 of the LAP), and if there is a real perceived need for safeguarded housing allocation land AT THIS TIME, notwithstanding the other considerations, then an alternative compromise option could be considered.

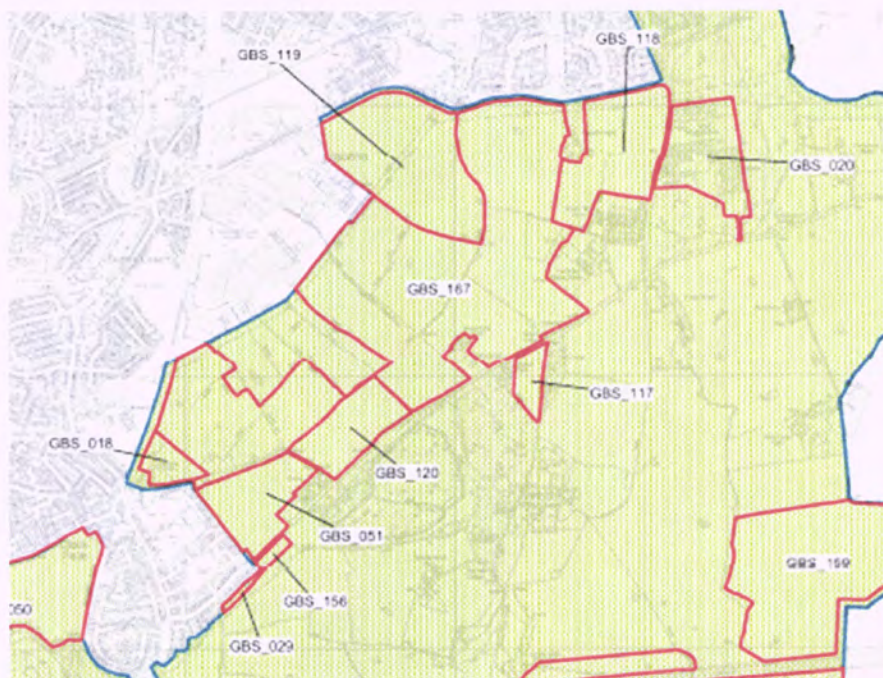
Parcels GBS_118, the remaining half of GBS_119 and the most north easterly parcel of GBS_162 in Location 21 could be examined independently as to their viability for development. If viable, these parcels could then be removed from the Green Belt into Safeguarded land, **leaving the remaining land within the Green Belt.**

This approach could be justified as:

1. There is a distinct and identifiable boundary for these parcels together - Reginald Road Industrial estate; B5204; Neills Road; footpath SN| |315 and the drain edging the south of GBS_119.
2. These parcels are close to all required sustainable infrastructure (rail, road networks, power and water).
3. Easy access to public transport.

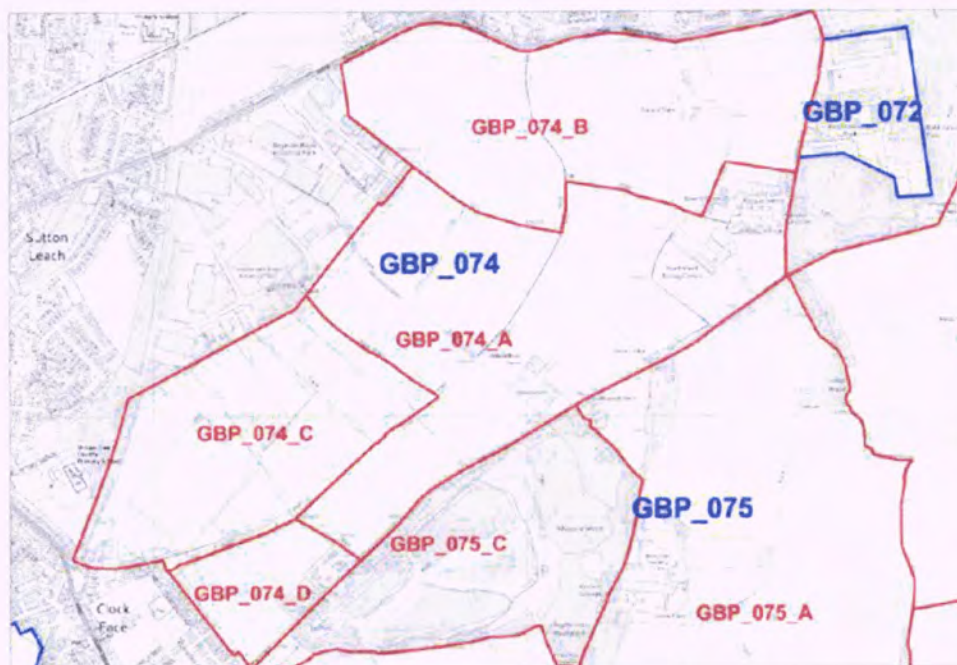
4. These parcels directly abut the B5204 and have no buildings close to the road on that boundary. Thus road networks are in place to deal with the volume of new traffic and can easily be adapted or extended to provide new access points to these land parcels.
5. Much less impact on combining settlements as fewer affected;
6. Many fewer watercourses, thus not as great, and therefore more manageable, impact on the ecology, climate change control and flood risk.
7. Retains a clear and simple boundary for the Green Belt and would not be classed as sprawl.
8. Retains much of the land to use for enhancing the landscape and environment, allowing the Council to meet many of their obligations in the Bold Forest Park AAP.
9. Retains the open landscape and green infrastructure, providing easy access between communities by existing footpaths and bridleways.
10. Addresses the potential isolation of LWS_108 and realistically retains it in the Green Belt.
11. Addresses many of the concerns identified in Option 1.

Appendix 1 – Maps of land parcels label changes between the 2016 proposals and the 2019 submission draft - to assist in the reading of this report



Above -
Detailed land parcels and sub-parcels in Location 21 – from promoted sites map 2016

And below:
Detailed land parcels and sub-parcels for GBP_074 from Page 345 of the Green Belt Review 2018



A report on the findings of a Partial Phase 1 habitat survey and three bat transects

for
LAND PARCEL GBP_74/HA4:

In the Green Belt Review 2018 and
The St Helens Local Plan 2020-2035 respectively

May 2019

Version history:

V1 Submitted May 2019

Author: Glenys McBain, BSc (Hons)

1 Executive summary

Many local residents are concerned that the council has decided to remove several parcels of land from the Green Belt, with the consequential loss of habitats and priority species, and of their own open space for wellbeing and recreational purposes.

In addition, the allocation of the land parcel covered in this report to housing with immediate effect has caused greater concern in a wider sense as to its appropriateness (and at such levels) in the locality.

When records were sought to identify land use and species present, it was discovered that many records are quite old. It was felt that up to date information was required to ensure accuracy of reporting.

Whilst this was a limited phase 1 survey, its findings show that:

- The green space is highly valued and well used by the local populace for its open space and landscape, its recreational and health use. It is a conduit between “villages” and other recreational spaces, and for walking, getting close to nature, dog walking and horse riding in their own right.
- Arable farming forms a significant portion of the 164 hectares or so of the land parcel (approximately 55%). Approximately 30% is permanent grassland (grazing land in the equestrian businesses, neutral grassland in the LWS, and some haylage), with the remainder as other habitats (woodland, hedge, ditches, ponds).
- The mosaic habitats of HA4 provide a significant green connection between Local Wildlife Sites (LWS), Local Nature Reserves (LNR) and other “green” areas, thus is of significant value to wildlife.
- HA4 is a commuting and foraging area for bats and raptors. Common Pipistrelle (*Pipistrellus pipistrellus*); Soprano Pipistrelle (*Pipistrellus pygmaeus*); Noctule (*Nyctalus noctula*); Buzzard (*Buteo buteo*) and Kestrel (*Falco tinnunculus*) were observed, although not in significant numbers. This could have been due to the exceptionally cold conditions on the survey dates. A hunting owl was also heard, but could not be definitively identified.
- Key Priority Species of Farmland birds are present and breeding in significant numbers over the whole site, Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*) and Snipe (*Gallinago gallinago*) in particular.
- The Regionally important species (North West Biodiversity Audit) English Comfrey (*Symphytum officinale*) is present scattered across the land parcel.
- The land parcel has an extensive network of interconnecting hedgerows (albeit species poor) and species rich ditches; stands of woodland; and many scattered ponds surrounded by mature deciduous trees. All the ditches observed had some standing water present.
- On a negative note, the western edge of GBP_074/HA4 is bounded by a disused railway line which is dominated by significant stands of Japanese Knotweed (*Fallopia japonica*) – many of which touch the boundary itself.
- Some fly tipping was observed to the north of the LWS and the boundary of Reginald Road/the industrial estate.

In summary then, this land parcel plays a significant role in the biodiversity of the area, the openness of the landscape and the health of its local population. Its loss would be significant.

2 Introduction to the surveys

In the eight week period between 31/03/2019 and 13/05/2019, a partial phase 1 habitat survey was undertaken on the land parcel known as HA4 in the St Helen’s Local Plan 2020-2035 and GBP_74 in the Green Belt Review 2018.

The purpose of the report was to record the current land use and species found in the land parcel as the council is proposing to remove this whole parcel from the Green Belt. Many existing records for this area are quite old, and it is felt that an up to date record is useful and necessary, especially as it pertains to the Bold Forest Park AAP (approved July 2017).

There is much concern within the local population that the character of the landscape will change to the detriment of their outlook, their mental health and their access to open space. In addition, many are concerned about the loss of wildlife and the effects on the environment that would result from the land use being changed to housing.

3 Methodology

3.1 Habitat surveys

Surveys were undertaken on the 30/03/2019, 08/04/2019, 20/04/2019, 07/05/2019 and 09/05/2019: to observe and record habitats and species from public rights of way (accessed from different locations).

Observations were collated, a list of species found created, a map created to show the habitats/land use within the land parcel and key biodiversity findings and observations noted.

Records will be submitted to the Merseyside Bio Bank project.

In addition, the surveys are to observe the existing public rights of way and their current use; negative impacts of invasive species and evidence of fly tipping.

3.2 Bat transect surveys

Three transect surveys were undertaken on the 30/03/2019, 21/04/2019 and 06/05/2019.

Data was collected and recorded using a variety of devices. The surveys were completed in line with the Bat Conservation Trust Good Practice Guidelines (Collins 2016).

Records will be submitted to the Merseyside Bio Bank project.

3.3 Limitations

Due to lack of time and access, the surveys were conducted by trained volunteers from public access footpaths that run through and across the land parcel, as well as observations from the surrounding roads and the disused railway line. Hence only partial data, though extensive, was able to be collected.

Due to lack of access, the citation and map for LWS_108 from 2016 (Merseyside Environmental Advisory Service) have been attached as complementary evidence to that collected during the surveys. *Where observation was not possible, their classification has been used to complete the habitat map.*

The site shows several habitat features that make it suitable for a range of mammals, reptiles and amphibians, including Water Vole (*Arvicola amphibius*) and Great Crested Newt (*Triturus cristatus*) that have previously been recorded here. This survey did not cover those aspects.

4 Findings

4.1 Main habitat classifications and findings;

The table in Appendix 1 shows the list of species found during the surveys. The maps in Appendix 3 show: the main findings for the habitat types observed during the surveys and a connectivity plan showing ecological pathways.

The field behind Gorsey Lane and Crawford Street (south west) shows overgrazing and poaching of the (semi-improved) grassland with 9 horses present at the time of survey. There is no evidence of the field being skipped out. This being noted, the tussocks of grass and vegetation appear to support breeding Lapwing (*Vanellus vanellus*) and Skylark (*Alauda arvensis*).

Not all the fields of Tunstalls Farm (a livery stable business to the north west) were easy to see, but they all appear to be permanent (semi-improved) grassland grazed by horses. They show good management with no overgrazing evident and fields being used in rotation. The rest of this land is neutral and marshy grassland that makes up LWS_108. The LWS is covered separately in 4.4.

The section of old parish boundary between the land parcels above has mature trees (mainly Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*), with some Hawthorn (*Crataegus monogyna*), Wild Cherry (*Prunus avium*), Sycamore (*Acer pseudoplatanus*), Hazel (*Corylus avellana*) and Elder (*Sambucus nigra*). There are two sections of fenced land in the area where the footpath exits the land parcel to the west. One has a marshy character, the other more ruderal.

All of the arable fields (cereal crops this year) appear to have a 3 – 5m arable margin of grassland. High numbers of farmland bird species (see 4.2) were present in these fields, especially Skylark (*Alauda arvensis*).

As expected, the highest floral diversity was present in the field margins, ditches and woodland habitats. There are many scattered ponds over the site, the majority of which are surrounded by mature trees. All ditches had some standing water, with more ditches present than anticipated following the desk study. The intact hedgerows present on site appear to support a wide range of smaller bird species despite being species poor with Hawthorn (*Crataegus monogyna*) dominant.

Oak (*Quercus robur*), Goat Willow (*Salix caprea*) and Ash (*Fraxinus excelsior*) continue to dominate the woodlands, although Alder (*Alnus glutinosa*) is frequent in the wet woodland at the north of the LWS.

One Regionally Important Plant Species that was found scattered across the whole land parcel was English or Common Comfrey (*Symphytum officinale*).

4.2 Key data for Farmland birds

The table in Appendix 1 shows the findings for the bird species observed during the surveys. Several breeding pairs of key farmland birds were observed, the following being of particular import:

Taxon name	Common Name	Notes
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs especially on the arable fields.
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs especially on the grassland.

4.3 Key data for Bats

The following table and survey maps in Appendix 2 show the dates and locations for the bat species recorded during the transect surveys.

Taxon name	Common Name	Notes
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences
<i>Nyctalus noctula</i>	Noctule	Single occurrence

The first transect was abandoned within 30 minutes as the temperature dropped to 2°C and would not have given valid data. Even so, the sightings were of the same species and in the same locations as in the first part of the subsequent transects – and transect three as a whole.

The bats showed in smaller numbers than expected but this could have been due to the unusually cold evenings this spring.

4.4 Local Wildlife Site (LWS_108)

Observations were made from the footpaths at the south and east, thus significant areas could not be observed even with binoculars due to the trees and hedges in the interior.

The citation and map from 2016 (Merseyside Environmental Advisory Services through Merseyside Bio-Bank Services) are included as Appendix 5 to help remedy this.

There was no management plan with the citation but it was noted that the species rich eastern field was showing significant succession growth (by Goat Willow (*Salix caprea*) in particular) and this will need to be controlled to keep the site's main BAP habitats as neutral grassland/marshy grassland.

The minimal horse grazing on other parts of the site appears to be working well.

4.5 Other important observations

All of the public footpaths through and across the land parcel show evidence of high usage by pedestrians - dog walkers in particular.

The central north/south footpath/bridleway was mown on the final visit, presumably to improve access and this is helpful.

The whole site has a pleasing open aspect with views across to Winter Hill.

The disused railway line that borders the site on the north-west is dominated by large stands of Japanese Knotweed (*Fallopia japonica*), in places touching the boundary. This is a significant problem as the pathway is well used and it could spread rapidly.

There is evidence of fly tipping on the north edge of the LWS. This is not extensive, but unsightly. Measures have been taken to reduce this with signs saying "NO TIPPING" and "24 hour CCTV in place". Otherwise tipping and litter are minimal.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5 Appendices

5.1 Appendix 1

Species List in table format.

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4

May 2019

<i>Taxon name</i>	Common Name	<i>Taxon name</i>	Common Name
<i>Acer campestre</i>	Field Maple	<i>Glyceria fluitans</i>	Floating Sweet Grass
<i>Acer pseudoplatanus</i>	Sycamore	<i>Hedera helix</i>	Ivy
<i>Aegopodium podagraria</i>	Ground Elder	<i>Heracleum sphondylium</i>	Hogweed
<i>Aesculus hippocastanum</i>	Horse Chestnut (seedling)	<i>Holcus lanatus</i>	Yorkshire Fog
<i>Agrostis stolonifera</i>	Creeping Bent	<i>Holcus mollis</i>	Creeping Soft Grass
<i>Ajuga reptans</i>	Bugle	<i>Hyacinthoides x massartiana</i>	Bluebells (hybrid)
<i>Alisma plantago-aquatica</i>	Alder	<i>Ilex aquifolium</i>	Holly
<i>Alisma plantago-aquatica</i>	Water Plantain	<i>Iris pseudacorus</i>	Yellow (Flag) Iris
<i>Alliaria petiolata</i>	Garlic Mustard	<i>Juncus conglomeratus</i>	Compact Rush
<i>Allium ursinum</i>	Wild Garlic (Ramsons)	<i>Juncus effusus</i>	Soft Rush
<i>Alnus glutinosa</i>	Alder	<i>Juncus inflexus</i>	Hard Rush
<i>Alopecurus pratensis</i>	Meadow Foxtail	<i>Lamium album</i>	White Dead-nettle
<i>Angelica sylvestris</i>	Angelica	<i>Lamium purpureum</i>	Red Dead-nettle
<i>Anisantha sterilis</i>	Barren Brome	<i>Lathyrus pratensis</i>	Meadow Vetchling
<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass	<i>Leucanthemum vulgare</i>	Oxeye Daisy
<i>Anthriscus sylvestris</i>	Cow Parsley	<i>Lolium perenne</i>	Rye Grass
<i>Apium nodiflorum</i>	Fool's-water-cress	<i>Lonicera periclymenum</i>	Honeysuckle
<i>Arrhenatherum elatius</i>	False Oat Grass	<i>Lotus corniculatus</i>	Birds Foot Trefoil
<i>Artemisia vulgaris</i>	Mugwort	<i>Lupinus sps</i>	Lupin (garden escape)
<i>Bellis perennis</i>	Daisy	<i>Lythrum salicaria?</i>	Purple Loosestrife?
<i>Betula pendula</i>	Silver Birch	<i>Malus sylvestris</i>	Crab Apple
<i>Brassica napus</i>	Oil-seed Rape	<i>Matricaria discoidea</i>	Pineapple weed
<i>Calystegia silvatica</i>	Large Bindweed	<i>Mentha aquatica</i>	Water Mint
<i>Cardamine flexuosa</i>	Hairy Bittercress	<i>Myosotis scorpiodes</i>	Water Forget-me-not
<i>Cardamine pratense</i>	Cuckoo flower	<i>Narcissus sps</i>	Daffodil (garden escape)
<i>Carex canescens?</i>	White Sedge?	<i>Oenanthe crocata</i>	Hemlock Water Dropwort
<i>Carex pendula</i>	Pendulous Sedge	<i>Pentaglottis sempervirens</i>	Green Alkanet
<i>Centaurea nigra</i>	Knapweed	<i>Phalaris arundinacea</i>	Reed Canary Grass
<i>Cerastium fontanum</i>	Common Mouse-ear	<i>Plantago lanceolata</i>	Ribwort Plantain
<i>Chamerion angustifolium</i>	Rosebay Willowherb	<i>Plantago major</i>	Greater Plantain
<i>Cirsium arvense</i>	Creeping Thistle	<i>Poa annua</i>	Annual Meadow Grass
<i>Cirsium palustre</i>	Marsh Thistle	<i>Poa trivialis</i>	Rough Meadow Grass
<i>Cirsium vulgare</i>	Spear Thistle	<i>Potentilla anserina</i>	Silverweed
<i>Cornus sanguinea</i>	Dogwood	<i>Potentilla reptans</i>	Creeping Cinquefoil
<i>Corylus avellana</i>	Hazel	<i>Prunus avium</i>	Wild Cherry
<i>Crataegus monogyna</i>	Hawthorn	<i>Prunus spinosa</i>	Blackthorn
<i>Dactylis glomerata</i>	Cocksfoot	<i>Pteridium aquilinum</i>	Bracken
<i>Deschampsia cespitosa</i>	Tufted Hair Grass	<i>Quercus robur</i>	Oak
<i>Deschampsia flexuosa</i>	Wavy Hairgrass	<i>Ranunculus acris</i>	Meadow Buttercup
<i>Digitalis purpurea</i>	Foxglove	<i>Ranunculus repens</i>	Creeping Buttercup
<i>Dipsacus fullonum</i>	Teasel	<i>Rosa arvensis</i>	Field Rose
<i>Dryopteris dilatata</i>	Broad Buckler Fern	<i>Rosa canina</i>	Dog Rose
<i>Dryopteris filix-mas</i>	Male Fern	<i>Rosa Rugosa</i>	Hedge Rose (garden escape)
<i>Elytrigia repens</i>	Common Couch	<i>Rubus sps</i>	Bramble
<i>Epilobium hirsutum</i>	Greater Willowherb	<i>Rumex acetosa</i>	Common Sorrel
<i>Epilobium montanum</i>	Broad Leaved Willowherb	<i>Rumex crispus</i>	Curled Dock
<i>Equisetum arvense</i>	Field Horsetail	<i>Rumex obtusifolius</i>	Broad-Leaved Dock
<i>Equisetum fluviatile</i>	Water Horsetail	<i>Rumex sanguineus</i>	Wood Dock
<i>Euonymus europaea</i>	Spindle Tree	<i>Salix caprea</i>	Goat Willow
<i>Festuca rubra</i>	Red Fescue	<i>Salix fragilis</i>	Crack Willow
<i>Ficaria verna</i>	Celandine	<i>Sambucus nigra</i>	Elder
<i>Filipendula ulmaria</i>	Meadowsweet	<i>Scrophularia auriculata</i>	Water Figwort
<i>Fraxinus excelsior</i>	Ash	<i>Senecio jacobaea</i>	Common Ragwort
<i>Fumaria officinalis</i>	Common Fumitory	<i>Senecio vulgaris</i>	Groundsel
<i>Galium aparine</i>	Cleavers	<i>Silene dioica</i>	Red Campion
<i>Geranium pyrenaicum</i>	Hedgerow Cranes-bill (garden escape?)	<i>Sisymbrium officinale</i>	Hedge Mustard
<i>Geranium robertianum</i>	Herb Robert	<i>Solidago canadensis</i>	Goldenrod (garden escape)
<i>Geum urbanum</i>	Wood Avens	<i>Sonchus asper</i>	Prickly Sow Thistle

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

<i>Taxon name</i>	<i>Common Name</i>	<i>Taxon name</i>	<i>Common Name</i>
<i>Sorbus aucuparia</i>	Rowan	<i>Tussilago farfara</i>	Coltsfoot
<i>Stellaria holostea</i>	Greater Stitchwort	<i>Typha latifolia</i>	Reed Mace
<i>Stellaria media</i>	Chickweed	<i>Urtica dioica</i>	Common Nettle
<i>Symphytum officinale</i>	Common Comfrey	<i>Veronica polita</i>	Grey Field Speedwell
<i>Symphytum x uplandicum</i>	Russian Comfrey	<i>Viburnum opulus</i>	Guelder Rose
<i>Taraxacum officinale</i>	Dandelion	<i>Vicia cracca</i>	Tufted Vetch
<i>Trifolium dubium</i>	Lesser Trefoil	<i>Vicia hirsuta</i>	Hairy Tare
<i>Trifolium pratense</i>	Red Clover	<i>Vicia sativa</i>	Common Vetch
<i>Trifolium repens</i>	White Clover	<i>Vicia sepium</i>	Bush Vetch
<i>Tripleurospermum inodorum</i>	Scentless Mayweed		

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aegithalos caudatus</i>	Long-tailed tit	
<i>Alauda arvensis</i>	Skylark	significant numbers including breeding pairs
<i>Anas platyrhynchos</i>	Mallard	(pair)
<i>Buteo buteo</i>	Buzzard	
<i>Carduelis carduelis</i>	Goldfinch	flock of 8
<i>Columba palumbus</i>	Wood Pigeon	several
<i>Corvus corone</i>	Carrion Crow	
<i>Cyanistes caeruleus</i>	Blue tit	
<i>Emberiza citrinella</i>	Yellowhammer	several pairs (at least six)
<i>Emberiza schoeniclus</i>	Reed Bunting	(pair)
<i>Erithacus rubecula</i>	Robin	
<i>Falco tinnunculus</i>	Kestrel	
<i>Fringilla coelebs</i>	Chaffinch	
<i>Gallinago gallinago</i>	Snipe	at least 12 - including breeding pairs
<i>Hirundo rustica</i>	Swallow	
<i>Parus major</i>	Great tit	
<i>Passer domesticus</i>	House Sparrow	several -including breeding pairs
<i>Perdix perdix</i>	Grey Partridge	(pair)
<i>Periparus ater</i>	Coal tit	
<i>Phasianus colchicus</i>	Pheasant	
<i>Phylloscopus collybita</i>	ChiffChaff	(several)
<i>Pica pica</i>	Magpie	
<i>Sturnus vulgaris</i>	Starling	
<i>Sylvia communis</i>	Whitethroat	
<i>Troglodytes troglodytes</i>	Wren	
<i>Turdus merula</i>	Blackbird	several
<i>Turdus viscivorus</i>	Mistle Thrush	
<i>Vanellus vanellus</i>	Lapwing	significant numbers including breeding pairs

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Aglais io</i>	Peacock Butterfly	
<i>Anthocharis cardamines</i>	Orange Tip Butterfly	
<i>Bombus lapidarius</i>	Red-tailed Bumble	
<i>Bombus lucorum</i>	White tailed Bumble Bee	
<i>Coccinella magnifica</i>	Ladybird	
<i>Pararge aegeria</i>	Speckled Wood Butterfly	
<i>Pieris rapae</i>	Small White Butterfly	

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Nyctalus noctula</i>	Noctule	Single occurrence
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Most frequent species recorded
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Occasional occurrences

<i>Taxon name</i>	<i>Common Name</i>	<i>Notes</i>
<i>Oryctolagus cuniculus</i>	Rabbit	

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.2 Appendix 2

Map of GBP_74/HA4 showing transect route and bats recorded

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Results of the two successful bat transects:



Mapping of the results from the bat transect number 2 on 21/04/2019



*Mapping of the results from the bat transect 06/05/2019
showing Common Pipistrelle (Pipistrellus pipistrellus) in red and Soprano Pipistrelle (Pipistrellus pygmaeus) in orange*

Note: The results of the last transect (06/05/2019) are very similar to the findings during the abandoned transect (30/03/2019) where the results were not recorded.

In both cases the temperature was very low (2°C in the abandoned; down to 7°C in the last).

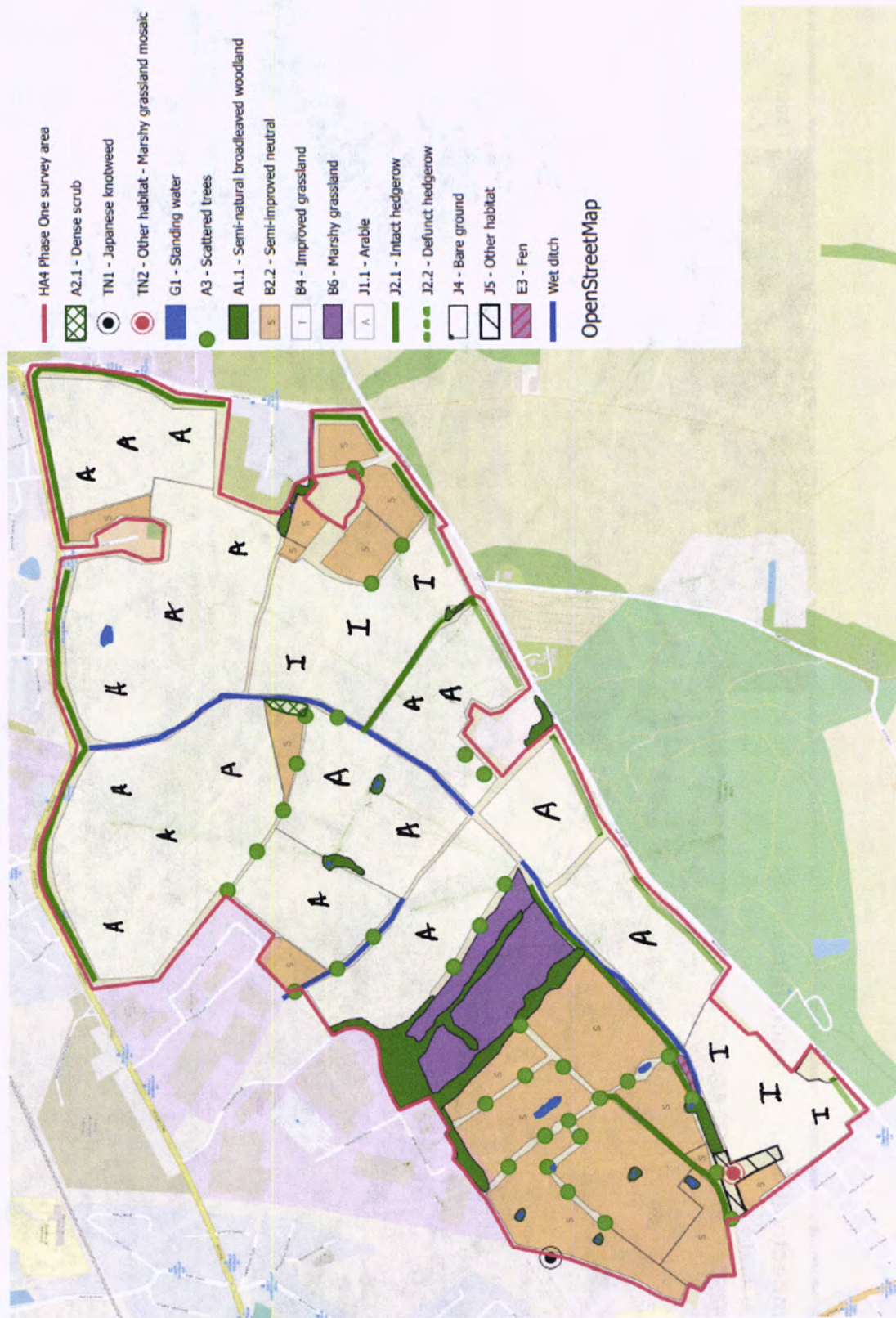
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

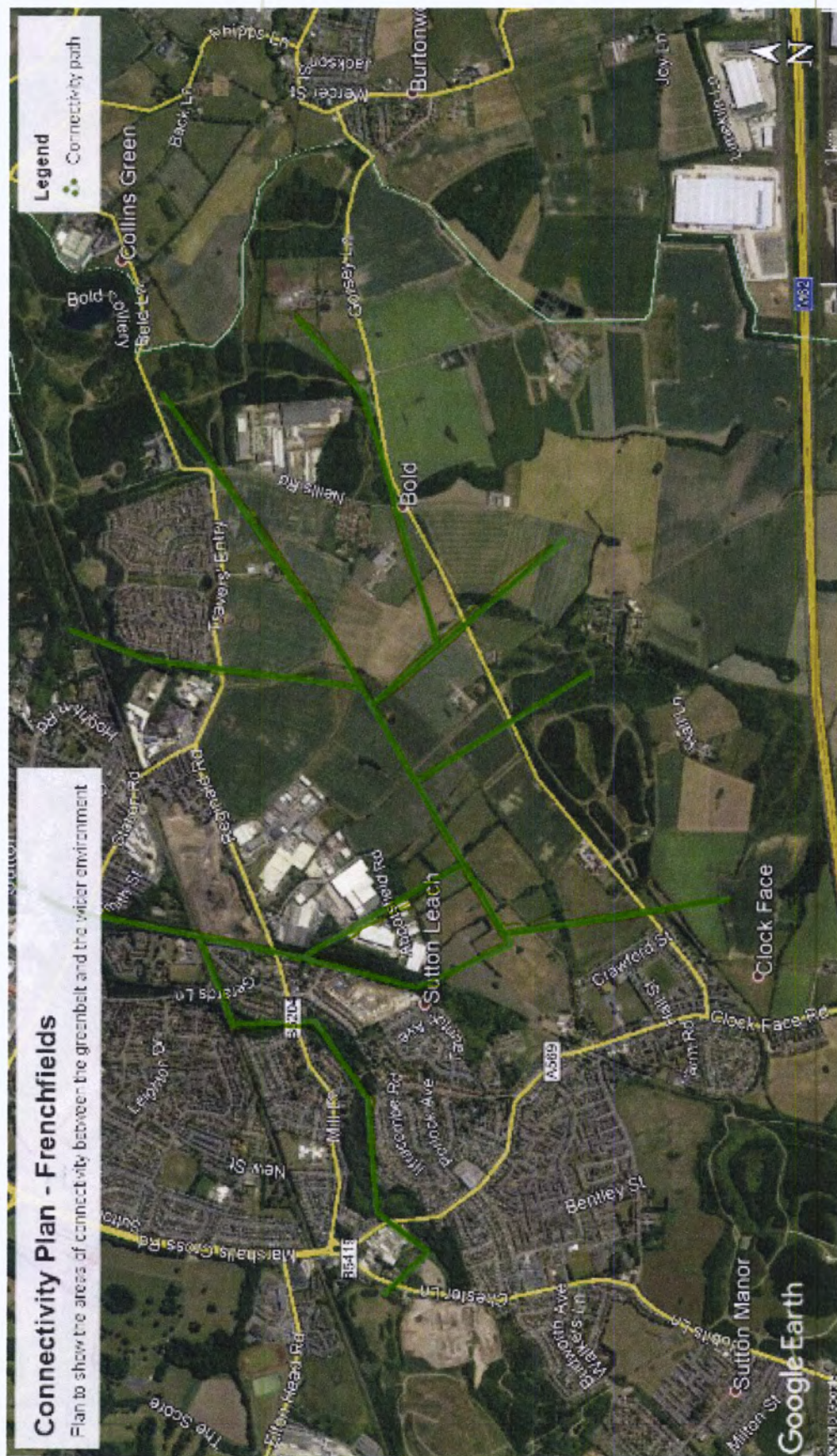
Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.3 Appendix 3

Phase 1 Habitat Map of GBP_74/HA4
And
Connectivity Plan for GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019





Partial phase 1 habitat survey for GBP_074/HA4
May 2019

5.4 Appendix 4

Photos taken during Phase 1 survey of GBP_74/HA4

Partial phase 1 habitat survey for GBP_074/HA4
May 2019

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



View south across Tunstalls Farm from disused railway line



View north across Tunstalls Farm from old parish boundary



Looking towards Clock Face Country Park from old parish boundary



One of many ponds on site



Looking north across the LWS grassland



Eastern field of LWS

Partial phase 1 habitat survey for GBP_074/HA4
May 2019



Looking north from LWS across arable fields



Looking north east across arable fields from central footpath



Stands of Japanese Knotweed at the western boundary



Horses grazing at Tunstalls Farm



View north east over arable land



View north over arable fields

5.5 Appendix 5

The Citation for LWS_108 Tunstalls Farm (2016)
and
The Map for LWS_108 Tunstalls Farm (2016)

*(supplied by Merseyside Environmental Advisory Service
through Merseyside Bio-Bank Services)*

Site Name: Tunstall's Farm (formerly Field north of Gorsey Lane)

Site Area: 15.05 hectares **National Grid Reference:** SJ534921

Date of Designation: April 1994 (part) **District:** St. Helens

Date of Last Revision: September 2016 **Local Wildlife Site Number:** 108

CITATION: A group of small agricultural fields with an extensive ditch and hedgerow network. The field is now under Environmental Stewardship and is developing into a species rich meadow including, regionally and locally important species. The ponds and ditches on site provide habitat for water vole and great crested newts.

APPRAISAL: This site has been evaluated against the guidelines approved by the Council for selection of Local Wildlife Sites. The site's evaluation against the guidelines is set out below.

Guideline		Comment
HABITATS		
H1; H2; H3; H4.	Rarity Diversity Nearness Isolation	1 priority BAP habitat; 3 regionally important habitats. 11 habitats recorded. 31 sites within 1Km. --
PLANTS		
SP1; SP2; SP3;	Rarity Diversity Naturalness	1 regionally important species; 1 locally rare species. Total of 74 plant species. 95.95% of the plants are native to the borough. Colonisation has been aided by man and the site has been physically altered.
SP4.	Nationally Rare	--
ANIMALS		
General		
SP5;	Rare/priority	--
Birds		
B1;	Non-breeding population	--
B2;	Breeding population	--
B3;	Regional rare/scare	--
B4;	Breeding assemblage	--
B5.	Assemblage, breeding, wintering, passage.	--
Dragonflies		
Od1.	Breeding	--
Od2.	Regional rare/scarce	--
Butterflies		
Bf1;	Region rare breeding	--
Bf2.	Breeding assemblage	--
Amphibians		
A1;	Rarity	Guideline met – Great crested newt
A2.	Exceptional populations	--
Reptiles		
R1;	Population of native species.	--
R2;	Exceptional population	--
Bats		
Bat1;	Roost	--
Bat2.	Assemblage	--
Mammals		
Mam1.	Breeding	Guideline met – Water vole.

SUMMARY: The combination of these factors has led to this site being identified as a Local Wildlife Site.

NOTE: Validated data from 1981 to September 2016 have been used in this assessment. Other data may become available to support this designation.

Status of species of nature conservation importance

Habitats

1 Priority BAP habitat

Unimproved neutral grassland

3 Regionally important habitats (North West Biodiversity Audit)

Unimproved neutral grassland
Marshy grassland
Standing water

Plants

1 Regionally important species (North West Biodiversity Audit)

Common comfrey (*Symphytum officinale*)

1 Locally rare species

Fen Bedstraw (*Galium uliginosum*)

Animals

Amphibians

1 Habitats Regulations 2010 – Schedule 2 species 1 Wildlife and Countryside Act – Schedule 5 species

Great crested newt (*Triturus cristatus*)

Mammals

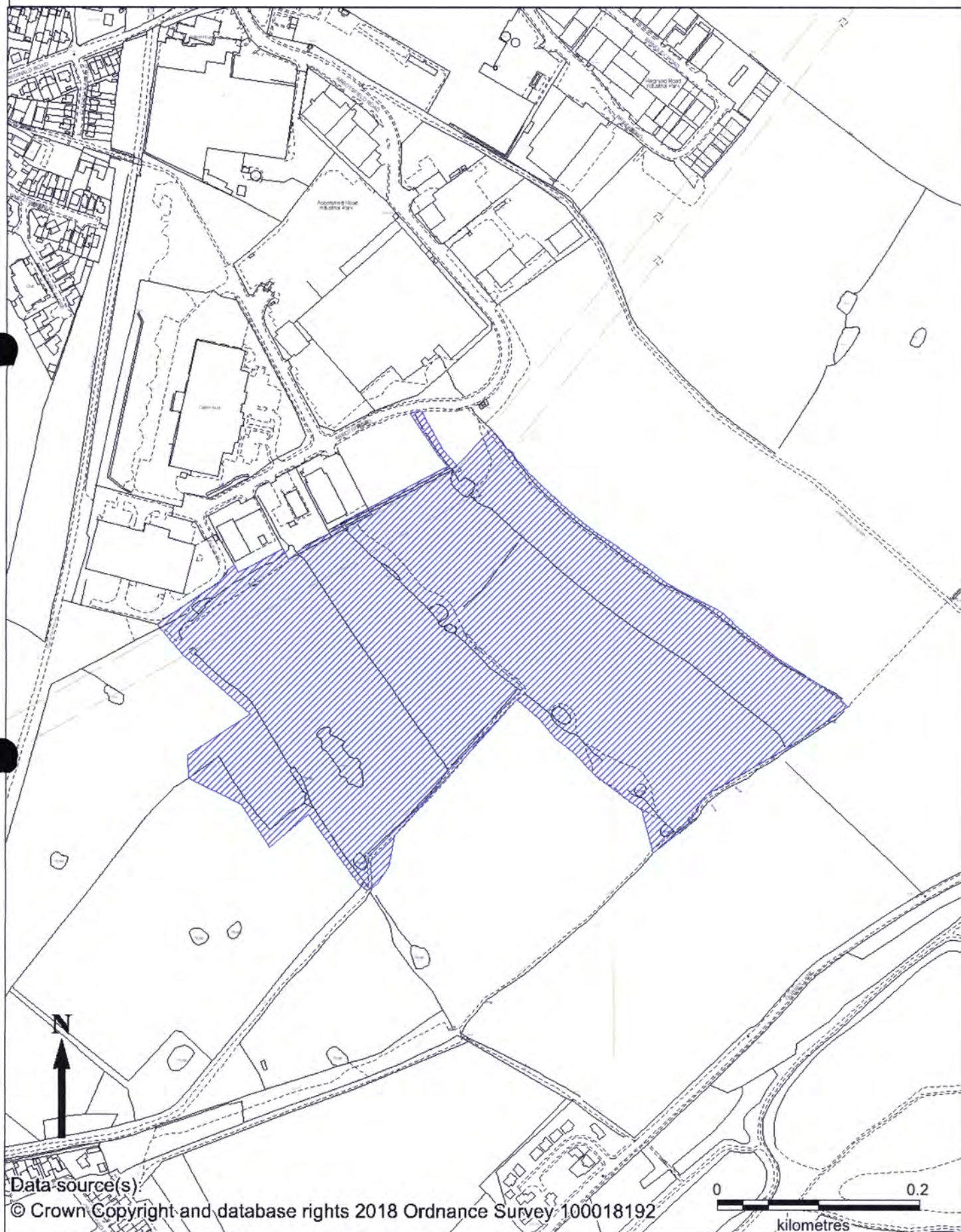
1 Wildlife and Countryside Act – Schedule 5 species

Water vole (*Arvicola terrestris*)

Local Wildlife Site 108
Tunstalls Farm
Scale: 1:2500



Merseyside
Environmental
Advisory Service



RO0676



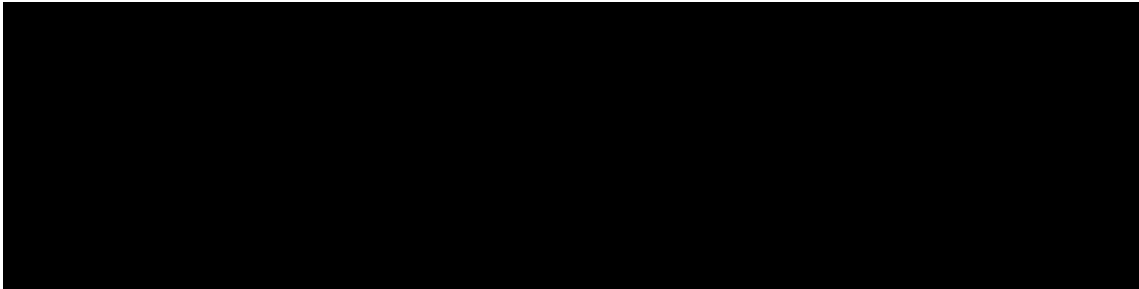
St Helens Local Plan - Site 4HA Bold Forest Garden Suburb

John Grace

to:

[REDACTED] planningpolicy@sthelens.gov.uk

08/05/2019 14:23



3 Attachments



Letter to LP manager Abbotsfield Farm.pdf representation-form Abbotsfield Farm 7-5-19.pdf



Call for Sites Form Abbotsfield Farm.pdf

Dear [REDACTED]

Please find attached a covering letter and completed Representation Form for the St Helens Local Plan, Site 4HA Bold Forest Garden Suburb.

If you require any further information please do not hesitate to contact myself or Bernard Grace copied in this email.

We look forward to hearing from you in due course and would ask if you can kindly acknowledge safe receipt of this email.

Kind regards

John Grace



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: Mr & Mrs	Title:
First Name: Bernard and Margaret and John	First name:
Last Name: Grace	Last Name:
Organisation/company:	Organisation/company:
Address: Abbotsfield Farm Gorse Lane Bold St Helens Postcode: WA9 4SF	Address: Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text" value="7/5/19"/>
--	---

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

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

Yes ☒ (Via Email)No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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.

3. To which part of the Local Plan does this representation relate?								
Policy	LPA05.1	Paragraph / diagram / table	Table 4.5	Policies Map	Site 4HA	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Requirements for site 4HA in Appendix 5 (pages 233-234 of the Submission Local Plan)				

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input 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 not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

We support the proposed allocation of site 4HA Bold Forest Garden Suburb for the following reasons:

- It provides a positively prepared plan that meets the area's housing needs;
- It is justified as a highly appropriate Garden Suburb in this location;
- It is consistent with National Policy in delivering sustainable development.

However, we consider the Local Plan to not be effective in its current form, in particular in relation to the delivery of site 4HA Bold Forest Garden Suburb. The proposed modifications set out in section 7 are necessary to make the Plan sound.

Table 4.5 on page 41 of the Local Plan gives an indicative number of 480 dwellings over the plan period for site 4HA. A far higher number are deliverable.

01

02

There is no reason why all of site 4HA Bold Forest Garden Suburb cannot come forward in the Plan period. Certainly our land at Abbotsfield Farm is available, suitable and immediately deliverable. All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity.

To make the Plan effective, it is necessary for the Development Requirements in Local Plan Appendix 5 to be modified regarding the equalization of timing, housing density, type of housing and developer contributions on the site.

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.

Table 4.5 on page 41 of the Local Plan should be amended to show all of site 4HA Bold Forest Garden Suburb being developed by 2035, with the indicative number of dwellings deliverable by 2035 increased from 480 dwellings to 2,988 dwellings.

The site requirements for site 4HA Bold Forest Garden Suburb in Appendix 5 of the Plan (Local Plan pages 233-234) should be amended as follows (new text underlined):

- Add a new bullet point to read: "All land parcels comprising site 4HA Bold Forest Garden Suburb should be treated equally with no favouritism or preferential treatment to be shown to some landowners over others."
- Amend the second bullet point on page 234 to read: "Financial contributions and the provision of on-site infrastructure for education and off-site highway works may be required; these should be equalized between landowners based on acreage and will be subject to further assessment at the master planning stage."
- an additional sentence after the third bullet point on page 234, to read, "Housing density and types of housing should be equalised between the different landholdings comprising the site".

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)

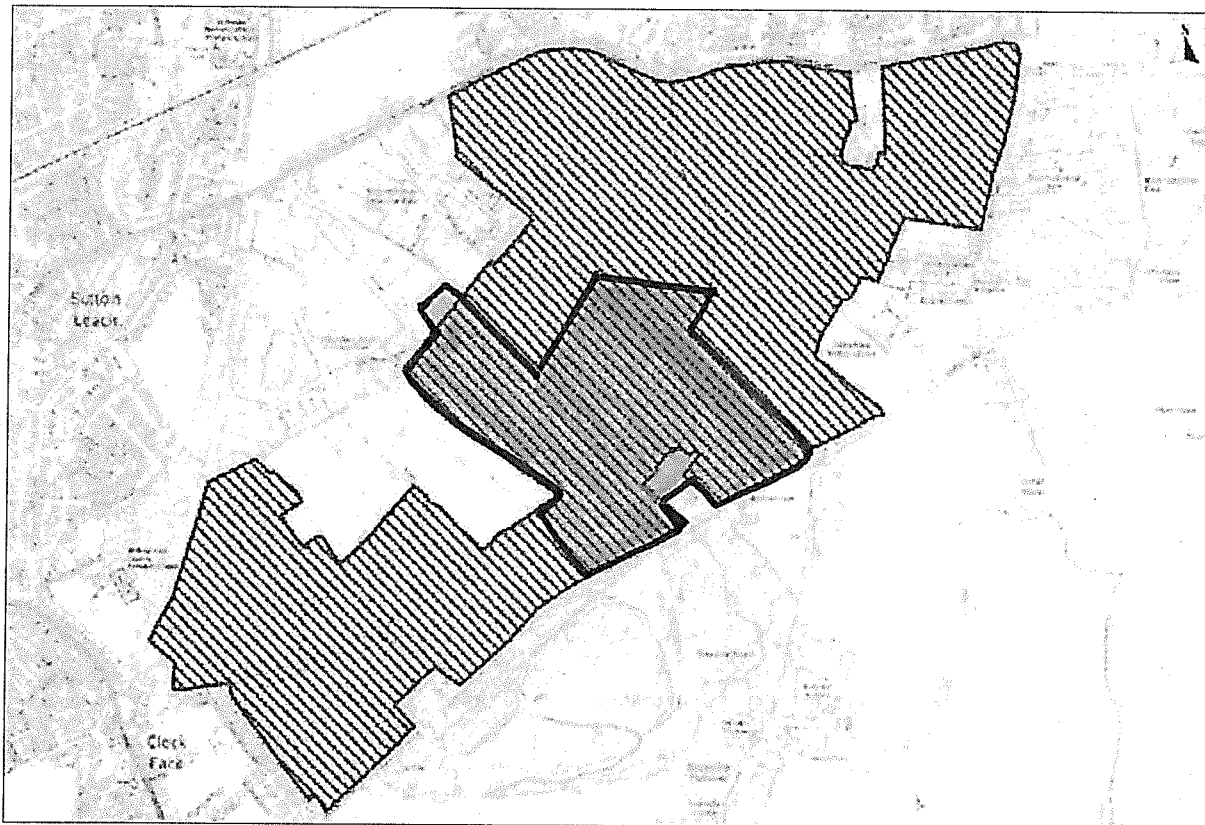
<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

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

We [REDACTED] at Abbotsfield Farm in the centre of the proposed Bold Forest Garden Suburb (site 4HA) therefore all plans will have a direct impact on [REDACTED]

[REDACTED] For these reasons we wish to be involved in all discussions regarding the future of this site.

Extent of our landownership outlined in green, overlain on the proposed allocation site 4HA



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.

Mr & Mrs B Grace
Abbotsfield Farm
Gorse Lane
Bold
St Helens
WA9 4SF

Development Plans Manager
Development Plans Section
Place Services
Town Hall Annexe
Victoria Square
St. Helens
WA10 1HP

By post and email to:

Date: 8th May 2019

Dear [REDACTED],

Site 4HA Bold Forest Garden Suburb – land at Abbotsfield Farm

As landowners of the central section of proposed allocation 4HA, we support the Local Plan's proposed allocation of our land and confirm that our land is available, suitable and deliverable for housing development. The extent of our land ownership is shown on the map overleaf.

We question why the Council consider that only 480 dwellings will be delivered by 2035 when housing could be delivered more quickly than this. Our land is available for development immediately and we suggest that table 4.5 on page 41 of the Submission Local Plan should be updated to reflect all of the Garden Suburb site 4HA being developed within the Plan period. We have made formal representations to the Inspector to this effect.

We trust that all landowners will be treated equally and there will be no preferential treatment of any parcels, including any in public ownership. Transparency over this issue will be vital to demonstrate fairness and probity.

To assist delivery of the Garden Suburb, we consider it vital that the Development Requirements for the site set out in Appendix 5 to the Local Plan should be clear on the equalization of timing, housing density, type of housing and developer contributions (pages 233-234 of the Plan). We have made representations to the Inspector to this effect as per the attached form.

We welcome the requirement in part 2 of Policy LPA05.1 Strategic Housing Sites that a comprehensive masterplan must form part of any planning application for development. We ask that the Council involve us in any discussions about the masterplan at an early stage of its preparation.

We [REDACTED] at Abbotsfield Farm in the midst of site 4HA, and therefore all plans will have a direct impact [REDACTED]
[REDACTED]t. For these reasons we wish to be very closely involved in all further work relating to the Bold Forest Garden Suburb and look forward to hearing from you in due course.

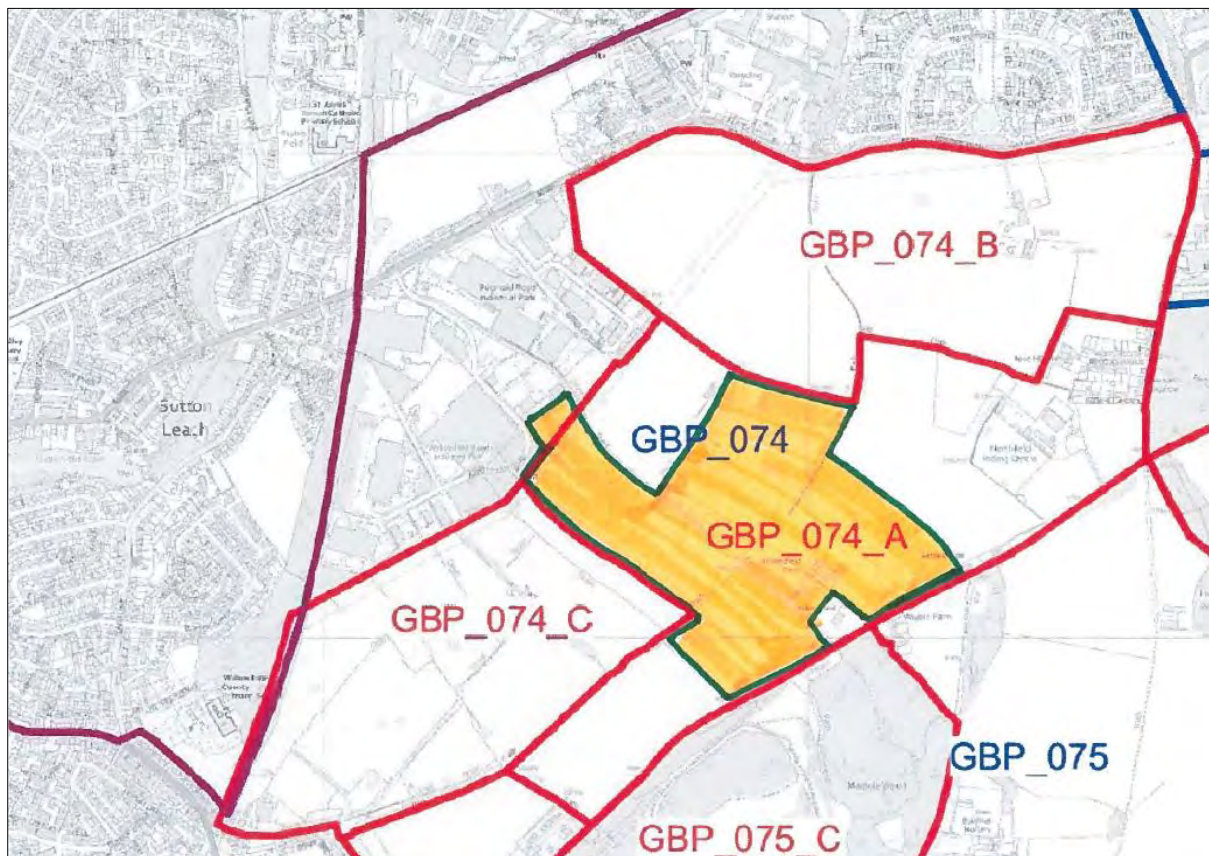
Yours sincerely,

[REDACTED]
Bernard and Margaret Grace

Extent of our landownership outlined in green, overlain on the proposed allocation site 4HA



Extent of our landownership outlined in green, overlain on the Green Belt Parcels South Map





St. Helens
Council

2016 Call for Sites

Local Plan and SHLAA Site Suggestion Form

For Office Use Only

Date received:

Scanned/ saved:

Plotted:

Site Ref:

SHLAA Site Ref

For help in completing this form, please see the accompanying Guidance Note, or contact a member of the Planning Policy team by telephone on 01744 676190 or by email to planningpolicy@sthelens.gov.uk.

Data Protection and Freedom of Information

We need your permission to hold your details on our database.

I agree that St. Helens Council can hold the contact details and related responses and I understand that they will only be used in relation to Community and Planning Policy matters.

Signed

Date

15/04/2019

This information is collected in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are:

- 1 to assist in the preparation of the St. Helens Local Plan; and
- 2 to contact you, if necessary, regarding the answers given on this form.

The above purposes may require public disclosure of any data received by St. Helens Council on the form, in accordance with the Freedom of Information Act 2000. If you have any concerns regarding the processing of your data, please contact Planning Policy by email to planningpolicy@sthelens.gov.uk or by telephone: 01744 676190

1. Your Contact Details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact.

	Your details	Your agent's details
Title	MR & MRS B. GRACE	
Name		
Position	OWNER	
Organisation		
Address	ABBOTSFIELD FARM GORSEY LANE BOLD	
Town	ST. HELENS	
County	MERSEYSIDE	
Postcode	WA9 4SF	
Telephone		
Email address		

2. Site Details

Please provide the details of the site you are suggesting. If you are suggesting more than one site, please use a separate form.

Name of the site/ other names it's known by	ABBOTSFIELD FARM		
Address	GORSEY LANE		
	BOLD		
Town	ST. HELENS		
Postcode	WA9 4SF		
Ordnance Survey Grid Ref.	Easting: SJ53 / SJ54		Northing: SJ92
Approximate size (in hectares)	30		
What is your interest in the site? (please tick one)	Owner	<input checked="" type="checkbox"/>	Lessee <input type="checkbox"/>
	Prospective purchaser	<input type="checkbox"/>	Neighbour <input type="checkbox"/>
	If other, please state:	<input type="checkbox"/>	

Have you attached/enclosed a map showing the site's precise location and detailed boundaries marked in red?*

Yes ☒

*For guidance on how to obtain an appropriate map, please see the Guidance Note

3. Proposed Future Use(s)

Please indicate the preferred use that you would like the site to be considered for. Please also indicate any other uses that you would consider acceptable. If you wish the site to be considered for a mix of uses, please tick all boxes that apply.

What is the preferred or alternative use(s) for the site and what is its potential capacity?

	Residential	Employment	Retail	Leisure	If other, please state:
Preferred use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative use(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potential capacityunits				
dph*	m ²	m ²	m ²	m ²

*Residential density is measured in dwellings per hectare (dph)

Has any master-planning or design work been done for any of the proposed uses above? If so, it would help us to understand development potential if this was supplied.

Yes ☐ No ☒

4. Site Ownership

Please record the site ownership details. If there are more than three owners, please record the fourth, etc. owner on a separate sheet. If possible, please indicate the extent of individual landholding(s) on the site map.

Do you know who owns the site? If so, please provide details below:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	Owner 1	Owner 2	Owner 3
Title	MR	MRS	
Name	BERNARD GRALE	M.S. GRALE	
Address	ABBOTSFIELD FARM, GORSEY LANE	ABBOTSFIELD FARM, GORSEY	
	BOLD	LANE, BOLD	
Town	ST. HELENS	ST. HELENS	
County	MERSEYSIDE	MERSEYSIDE	

WA9 4SF

Postcode	WA9 4SF	WA9 4SF	
Telephone			
Email address			
Has the owner(s) indicated support for the proposed development?			
Yes	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
No	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Market Interest

Please choose the most appropriate category below to indicate what level of market interest there is in the site.

What level market interest (from developers/ house builders) does the site have?
(please tick all that apply)

Comments

Site is owned by a developer ☐

Site is under option to a developer ☐

Enquiries received ☒

Site is being marketed ☐

None ☐

Not known ☐

DEVELOPERS HAVE VISITED THE SITE

6. Site Condition

Please record the current condition of the site. If you have any additional comments, please provide them in Section 9 ("Any other information").

Is the site in active use?

Yes ☒

No ☐

What is the current use(s) of the site?

Agricultural

If vacant, what was the previous use of the site and which year was it last used?

Year:

What proportion of the site is made up of buildings? ☐ %

What proportion of the site is open land? 100 %

How many buildings are on the site?

Approximately which year were the buildings built (if there is a mix of buildings, please state the predominant building type)? Year:

What proportion of the buildings are currently in use? ☐ %

What proportion of the buildings are current vacant? ☐ %

What proportion of the land is currently in active use?

100 %

What proportion is **greenfield** (i.e. not previously developed)

100 % (A)*

What proportion is **previously developed and cleared**?

% (B)*

What proportion is **previously developed and not cleared** (e.g. demolition spoil etc.)

% (C)*

*A+B+C should add up to 100%

What is the predominant neighbouring use of the site?

AGRICULTURAL & INDUSTRIAL

Is the site within or directly adjacent to an existing settlement area?

Yes ☐

No ☒

2 properties border.

7. Constraints to Development

Please tell us about any known constraints that may affect development for the proposed use(s), details of what action is required, how long it will take and what progress has been made. Please use a separate sheet where necessary. If you have undertaken any survey work and/or plans to address the issues, it would be helpful if you can supply this.

Type of constraint	Yes, No or Don't Know	Nature and severity of constraint*	Action needed, timescales and progress	Confirmed by technological study or by service provider?	
				Yes	No
For example: Land contamination	Yes	Hydrocarbons: Minor	Requires remedial action	X	
(a) Land contamination	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(b) Land stability	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(c) Mains water supply	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(d) Mains sewerage	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(e) Drainage, flood risk	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(f) Electricity supply	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(g) Gas supply	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(h) Telecomms	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(i) Highways	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(j) Ownership, leases	NO			<input type="radio"/>	<input type="radio"/>
(k) Ransom strips, covenants	NO			<input type="radio"/>	<input type="radio"/>
(l) Habitats or wildlife	DON'T KNOW			<input type="radio"/>	<input type="radio"/>
(m) If other, please state:				<input type="radio"/>	<input type="radio"/>

8. Site Availability

Please indicate when the site may be available

Excluding planning policy constraints (e.g. Green Belt policy), when do you believe the site could be available for development?



Immediately*

*to be immediately available, a site must be cleared, unless it is for conversion



Not Immediately Available

If not immediately available, please state when it could be available

Year:

If the site is not available immediately, please explain why (e.g. the main constraint(s) or delaying factor(s)) and what actions are necessary to remove these:

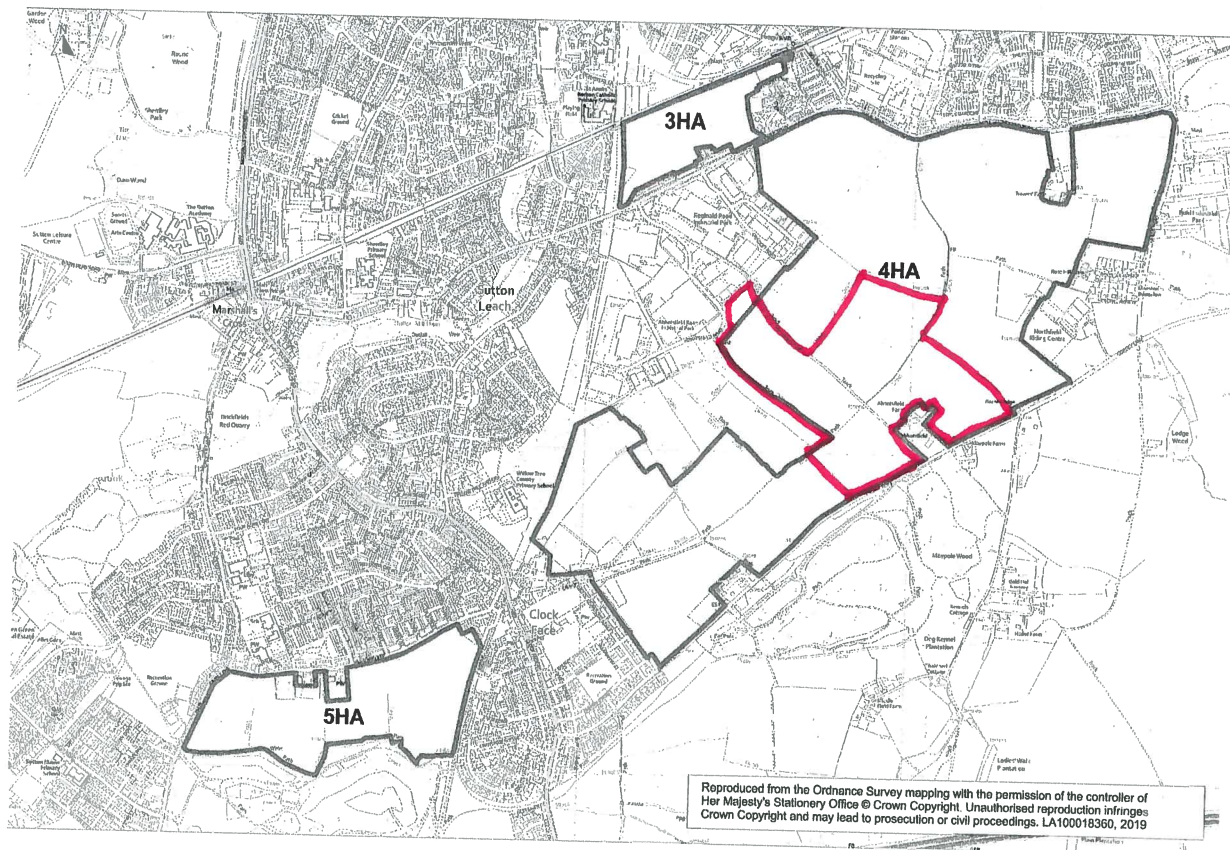
9. Any Other Information

Please tell us anything else of relevance regarding the site, if not already covered above. Please continue on a separate sheet, if necessary.

Please return this form and accompanying sheets/maps, etc. by
12:00 noon on Wednesday 2nd March 2016 by email or by freepost to ensure your site is fully considered in the Local Plan.

Return by email to:	Return by freepost (no stamp required) to:
planningpolicy@sthelens.gov.uk	St.Helens Council Freepost RLYY-RYXG-HYHS Development Plans, Chief Executives Department, Town Hall Annexe, Victoria Square, St.Helens, WA10 1HP

For any assistance, please contact a member of the Development Plans team by telephone on 01744 676190.



RO0677

05 APR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.

Any comments received after this deadline **cannot** be accepted.

This form has two parts;

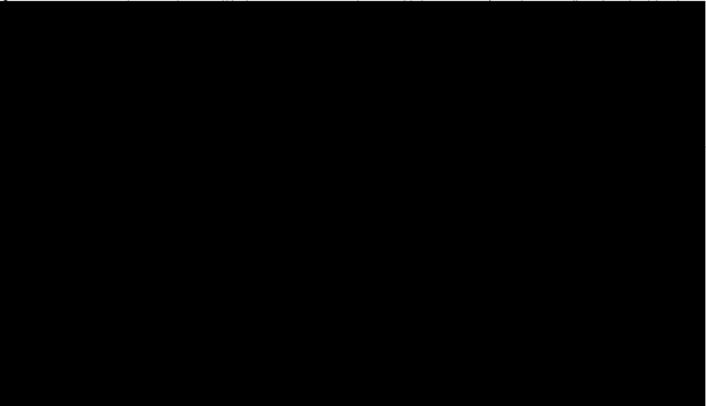
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

13 MAY 2019
1369

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>GLENYS</u>	First name: _____
Last Name: <u>GRACE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
	Address: _____

	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>27-3-19</u>
--	----------------------

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

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Ground Floor Reception
St.Helens Town Hall
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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.**

RO0678



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).

1051

13 MAY 2019

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: PS-Cmj	First name:
Last Name: GRAY	Last Name:
Organisation/company:	Organisation/company:
Address: 130 GARTONDS LN	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

22.3.19

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.

RO0679

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

Ref: LPSD

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MS</u>	Title: _____
First Name: <u>CAROL</u>	First name: _____
Last Name: <u>GREEN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>7 DOCEWORTH CLOSE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 3QV</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>14.4.19</u>
------------------	----------------------

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

☐ Yes (via email)

☐ No

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RETURN DETAILS

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

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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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**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.**

RO0680

302



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: ERIC

Last Name: GREEN

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: 02 MARCH 2019

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

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

☒ Yes (via email)

☐ No

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

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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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 LPA 04 04	HA2 HA2	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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.
<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>Relaxation of Greenbelt Land contradicts previous Government policy and therefore should be retained. Local services such as NHS GPs, Dentists, Schools etc already at breaking point. These proposals would surely destroy them.</p> <p>500 plus homes would generate 1000 + 1500+ additional vehicles realising some 3000+ vehicle movements daily leading to massive congestion on already inadequate 'B' roads and contributing unbearable levels of air pollution, and consequently increase ill health upon the residents of Garswood.</p> <p>Proposals merely a 'cash cow' to generate massive increase in Council Tax.</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.
Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

NO.	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.

RO0681

303

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

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.

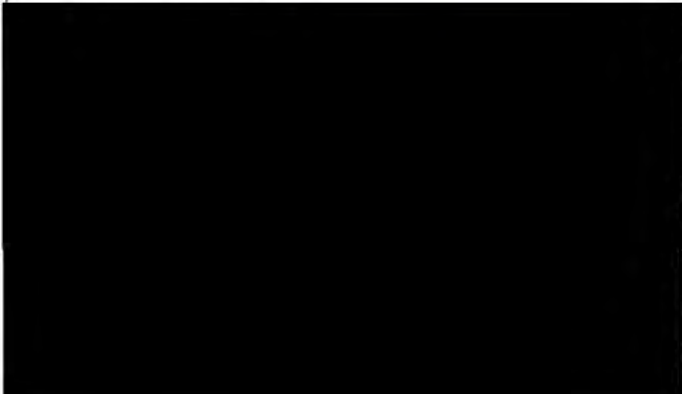
This form has two parts;


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</u>	First name:
Last Name: <u>GREEN</u>	Last Name:
Organisation/company: <u>✓</u>	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>03 March 2019</u>
--	----------------------------

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

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

☒ Yes (via email) ☐ No

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

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

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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 LPA 04	HA2	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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>Regards to plans for site HA2 south of Billinge Road, Garswood. Roads, schools, doctors, dentist are not adequate now so I cannot see how we will cope with over 250 more houses.</p> <p>There is already too much traffic on the old 'B' roads. Too much pollution also leading to more cases of ill-health.</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	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.

RO0682

①-LPA06

②-Para 172 DTC

PF0752

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

(we will correspond via your agent)

Title: MRFirst Name: ANDREW JOSEPHLast Name: GREENOrganisation/company: SPROOERVICARS
BAKERYAddress: PLAS-Y-NAINT
339 WALKERS LANE MICK-
LEHEAD GREEN, ST. HELENSPostcode: WA9 4AQ

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

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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	LP05 LP03	Paragraph/ diagram table	71, 72 8.9 A1 89.1 + 89.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				LP05: 6HS. Land East of chapel lane and South of Walsingham Sattammar				

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input 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. 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>①. Not positively prepared, not practical, not consistent with achieving sustainable development.</p> <p>②. Not justified, no effective joint working on cross boundary strategic matters has been evidenced.</p> <p>③. Not effective, no effective, does not take into account reasonable alternatives.</p> <p>④. Not consistent with National policy framework (July 2018).</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.

E.B.P 080.
Housing Allocated from 2020 in
close proximity to LPSO BHS
HAGS - Not developable Capacity: 569.
5 HA (22ha) Reginald Road
4 HA (133ha) Wells Road
N.D.C: 3000

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:

TO SAVE OUR
GREENBELT

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.

RO0683

① - LPA06
② - Para 172 DTC

PF0753

13 MAR 2019



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

Ref: LPSD
(For official use only)

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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>MISS</u>	Title: _____
First Name: <u>JESSICA</u>	First name: _____
Last Name: <u>GREEN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>339 WALKERS LANE, SUTTON MANOR, ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4AQ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>12.03.19</u>
-----------------------	-----------------------

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

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

☐ Yes (via email) ☐ No

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
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WA10 1HP**

or by hand delivery to:

Ground Floor Reception
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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPC03 LP003	Paragraph/ diagram table	7.1, 7.2 8.9 ALL 8.9.1 + 8.9.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				LP003 GHS: Land East of Chapel Lane and South of Walkers' Ref: have tactical manor.			

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>① Not positively prepared, not practical, not consistent with achieving sustainable development</p> <p>② Not justified - does not take into account reasonable alternatives.</p> <p>③ Not effective - no further joint working across boundary strategic matters has been evidenced.</p> <p>④ Not consistent with national policy. NOT SUSTAINABLE in accordance with the National Planning Policy Framework (July 2018)</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.

E.B.P 080
 Housing Allocated from 2020
 in close proximity to LPSD 6HS
 HAS - Net developable capacity: 569
 5HA (22ha)
 4HA (133ha) - Reginald Road
 Wells Road
 N.DC-3000

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	<input checked="" 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:

TO SAVE OUR
 GREEN BELT

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Please keep a copy for future reference.

RO0684



St. Helens
Council

① - LPA06
② - Para 17.2 OTC

819

13 MAR 2019

Ref: LPSD

(For official use only)

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Joe	First name:
Last Name: Green	Last Name:
Organisation/company:	Organisation/company:
Address: 330 walkers lane, Sutton Manor, St. Helens	Address:
Postcode: WA9 1AQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	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 ☐

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Town Hall
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Merseyside
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Telephone: 01744 676190

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PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPCS LPD03	Paragraph / diagram / table	7.1, 7.2 8.9 8.9.1. - 8.97	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				LPD0 6 HShard Gude & Chapel Lane and South of Walsingham REF: Sutton Manor.			

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 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. Not positively prepared, Not practical, Not consistent with achieving sustainable development
- ② Not Justified - Does not take into account reasonable alternatives.
- ③ Not Effective - No effective joint working or cross boundary strategy matters has been evidenced.
- ④ Not consistent with national policy. NOT SUSTAINABLE in accordance with the National Planning Policy Framework (July 2018)

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.

E.B.P. OSO.
Housing Allocated from 2020 in
close proximity to LPSD 6HS.
HAS - Net Developable Capacity: 569.
SHA (22ha) - Reginald Road
4HA (133ha) - Wells Road
N.D.C - 3000

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

TO SAVE OUR
GREENBELT

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

RO0685



St Helens
Council

①-LPA06

②-Para 172 DTC

820

13 MAR 2019

Ref: LPSD

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

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>DENISE</u>	First name:
Last Name: <u>GREEN</u>	Last Name:
Organisation/company: <u>ST HELENS COLLEGE</u>	Organisation/company:
Address: <u>PLAS-Y-NAUT 339 WALKERS LANE, NUCKLEHEAD GREEN, ST. HELENS</u>	Address:
Postcode: <u>WA9 4AQ</u>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: <u>7-3-19.</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) AND POSTAL ADDRESS ALSO 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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DATA PROTECTION

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

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

3. To which part of the Local Plan does the representation relate?									
Policy	LPO5 LPO3	Paragraph / diagram / table	7.1, 7.2 8.9 8.9.1 - 8.9.7	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				LPSD 6HS - Land East of Chapel Lane and South of Walkers Lane REF: Sutton Manor.					

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

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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- ① NOT positively prepared, NOT practical, NOT consistent with achieving sustainable development.
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E.B.P 080.
Housing Allocated from 2020 in
close proximity to LPSD OHS.
HAS - Net Developable Capacity: 569.

5 HA (22ha)

4 HA (133ha) - Reginald road -
Wells road.

N.D.P - 3000

Please continue on a separate sheet if necessary

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



Yes, I wish to participate at the oral examination

TO SAVE OUR
GREEN BELT.
FOR FUTURE
GENERATIONS.

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.

RO0686



St. Helens
Council

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

Ref: LPSD

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

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: Shelley	First name:
Last Name: Green	Last Name:
Organisation/company:	Organisation/company:
Address: 14 Agnes St	Address:
Postcode: WA9 4RH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

28.3.19

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

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

Yes ☐ (Via Email)

No ☐

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RO0687



St. Helens
Council

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Ref: LPSD

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Part A – Personal Details

Part B – Your Representation(s).

1096

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>SANDRA</i>	First name:
Last Name: <i>GREEN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>42 GORSEY LANE BLOCKFACE</i>	Address:
Postcode: <i>WA9 4XB</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

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

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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)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

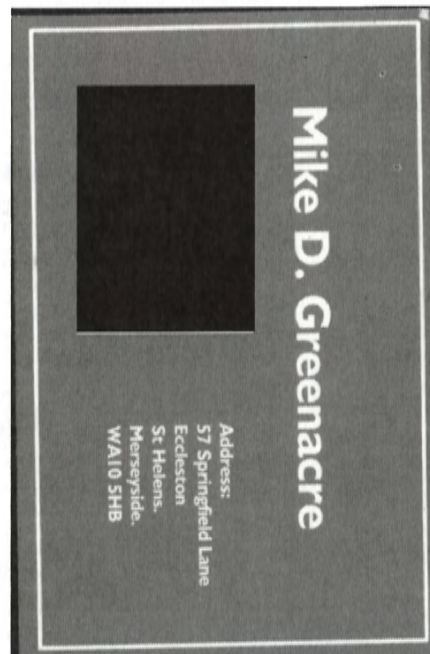
Please use a separate copy of Part B for each separate comment/representation.

RO0688

- ① - LPA04
- ② - LPA05
- ③ - LPA06

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

PF0773





St. Helens
Council

838 13 MAR 2019

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

Ref: LPSD

(For official use only)

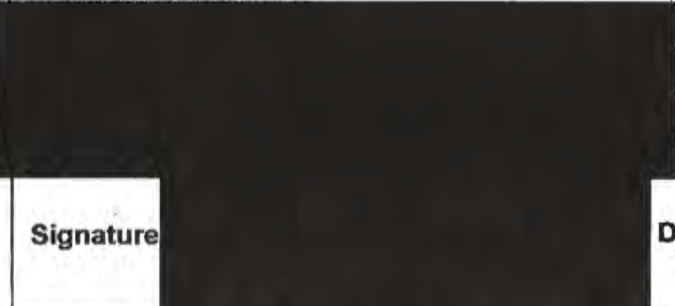
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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

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Yes ☒ (Via Email)

No ☐

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

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

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 SEE ATTACHED SUBMISSION

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 SEE SUBMISSION

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

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

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

Mike D. Greenacre



Address:
57 Springfield Lane
Eccleston
St Helens.
Merseyside.
WA10 5HB

FROM M D GREENACRE

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

12th March 2019

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

To whom it may concern,

I am a resident of Eccleston [REDACTED]

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

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

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

ST HELENS LOCAL PLAN SUBMISSION DRAFT {LPSD}

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

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

OVERVIEW

There are a number of key fundamental factors that make the LPSD a flawed plan. In the following pages I have tried to focus on these key factors but with brief mention on other elements that support the case against the LSPD. Again it is important to emphasise that I support the need for a development plan but this revised plan has taken little or no account of residents views and is not based on genuine need that is sustainable nor justified because of the use of biased and exaggerated data that has been used to create this plan in its current format rather than have data that informs the plan

DEFENDING OUR GREEN BELT

- From the original plan and following consultation over 5500 residents submitted their views of which over 90% were against the plans strategy.
- A number of campaign Groups were formed to campaign against the plan where significant tranches of Green Belt {GB} land were being proposed for mainly housing development.
- ECRA alone has over 1000 members as defined on its Facebook site which is by invitation only
- ECRA has an active website that was set up to keep local residents informed about progress, actions and outcomes – ecra.org . The site also highlights ECRA's professional approach by the appointment of **highly qualified Planning, Demographic and Economic specialist's** in support of its opposition against the LPSD.
- I am strongly opposed to Industrial and Housing Development on GB land where it can be clearly demonstrated that the need doesn't exist and where to remove such GB land even to a "Safeguarded" status at this time is completely unnecessary.

KEY OBJECTIONS TO SHLPSD

1. The need to co-operate fully with other local councils appears not to have been followed and no statement showing common ground is in evidence
2. There is a standard method for calculations that can only be varied by the justification of "exceptional circumstances". I do not believe this plan has demonstrated there are any.
3. The fundamental Economic strategy is based on significantly over optimistic assumptions, using out of date forecasts to justify the Councils assertion that there is a clear need to include Green Belt land in its longer term plan both now and beyond 2035. The main ECRA submission deals with this in detail and concludes there is no justification for changing GB boundaries.

4. The current Brown Field register, only created in the past 18 months does not have listed any contaminated Brown Field space despite the fact that pockets of such land are only mildly contaminated. Neither Councils nor Developers want to bear the costs of bringing such land back into use.
5. Little account seems to have been taken of the decreases in population that have occurred over the past 38 years.

In 1981 191'000 people resided in St Helens and by 2011 this figure had bottomed at 176'000 – minus 14'000 people.

This figure has remained almost static for the past few years with only marginal increases up to 2018 to 179'000. If account is taken of this revised plan as it stands the projected increase in population during the next 15 years to 2035 is a massive increase which history – the past 38 years - would suggest is a pipe dream. Indeed the ONS bulletin December 2018 forecasts that population growth by 2041 will have reached 187'000 – plus 8000 over the next 22 years and a significant part of that relates to single occupancy growth and the fact that people are continuing to live longer – not a significant increase in the actual working population.

(2)

Taking account of these key objectives St Helens Council should have to amend their revised plan by retaining current GB land {returning land that has been removed from GB and reclassified as "Safeguarded"} because the data they have used to justify their aspirations is based on exaggerated forecasts for new jobs, subsequent population increases and therefore the need for the housing numbers they are forecasting.

Exaggerated
need

Indeed it is likely if these forecasts etc. are not thought through and revised to more sensible levels then it could fail both the legal and soundness tests that it is obligated to achieve.

ECONOMIC AND GROWTH TRENDS -

1. In this plan the forecasted economic growth trends are way above historic growth rates and exceptionally optimistic. They appear to be based on the continued growth of logistical warehousing and distribution. This is in direct competition with the likes of Warrington and Liverpool along side the M62 and the A580 – East Lancs dual carriageway so even on historical annual growth rates I cannot see how this can be deemed to be "Objectively Assessed Needs"
2. Clearly the types of jobs in this sector are relatively low skilled and contained by the ever-growing use of automation. Conversely the development and revival of a higher paid skilled work force is unlikely to form a key part of this plan. Even if the current aspirations for population growth based on new industries in or around the town were achievable then this would not necessarily result in significant increase in population growth. For example the recently announced plan for a proposed £70

(1)

million Glass Futures facility which is good news will attract only around 50 new jobs albeit highly skilled research roles. Immigration into the town would be a necessity but historically there is evidence that immigration has always been at a very very low level into the borough. The competition from other towns along the M62 and A580 corridors with similar business strategies will provide intense competition for new employees necessary to meet those ambitious objectives.

POPULATION GROWTH – Based on increased job creation forecasts

It can clearly be seen from the LCRCA SHELMA that St Helens new planned growth targets for jobs in the 15 year period is more than 4 times the current baseline growth. Comments from the SHELMA draft executive summary – “quite aspirational in nature” – para 5.3!!!

	Current	Baseline	Target	Baseline %	Target %
Halton	3,800	12,300	8,500	224%	176%
Knowsley	9,000	12,400	3,400	38%	30%
Liverpool	28,700	67,600	38,900	136%	106%
Sefton	2,500	6,500	4,000	160%	126%
St Helens	3,200	17,100	13,900	434%	341%
Wirral	5,800	11,400	5,600	97%	76%
West Lancashire	6,000	6,800	800	13%	10%

Extract from LCRCA SHELMA draft Exec Summary - Jan 2017- with percentage comparison.

HOUSING NEED –VERSUS LAND AVAILABILITY

Based on population growth required to support new jobs

1. In creating the new plan the Strategic Housing Land Allocation Assessment only 2 years ago in 2017 suggested that around 7500 houses would be required over the 15 year plan period.
2. It suggested that 77% of the requirement – 5550 homes - would be developed on Brown-Field sites currently on the register. In fact the Brown-Field register suggested that it could provide just over 5800 homes {March 2017}
3. In assessing land availability it is important that the differences between Brown-Field; Brown-Field contaminated and Unsuitable sites are clearly distinguished. This is in addition to GB sites that maybe released for development – no longer “Safeguarded” because of “exceptional circumstances”

4. The facts are that

- There are a number of mildly contaminated sites that with small remedy could quickly be decontaminated. The current BF Register does not take account of these additional sites that could be developed
- No provision has been set aside for the cost of remediation of BF sites, nor who should actually pay for the remediation process. Site owners and developers do not want to get involved in any arguments or costs relating to contaminated BF sites – why would they when by adding high quality GB land to their plans they believe that they can justify demand on an “exceptional basis”
- **Locally elected Councils; Government and Developers should be forced to share in the cost of remediation particularly the development of BF sites that could help significantly to regenerate Town Centres such as St Helens which is in dire need of a complete strategic overhaul.**
- The council cannot ignore this issue. Surely, it is incumbent on the Council to create a strategy to recycle these sites and where necessary work with for example the newly created LCRCA and the Northern Powerhouse to make a case for part funding from Central Government which needs to do more to assist northern councils saddled with cleaning up legacy industrial sites in order to satisfy the wider requirements of the NPPF for regenerating town centres and protecting valuable Green Belt locations that are under threat.
- There appears to be no policy on contaminated sites remediation in St Helens or LCRCA to provide housing land and help regenerate run down inner town centre sites.

IS GREEN BELT LAND REQUIRED TO MEET HOUSING TARGETS?

1. In reviewing previously presented Council Plans for development – 2012 – SHCS envisaged no requirement for GB Development but this has dramatically changed by 2016 – SHLPPO where it is suggested that St Helens can no longer meet its development land needs
2. By the release of SHLPD 2019 this new plan has reduced the GB Development area requirements but put forward a number of sites as being safeguarded to ensure they – the Council - can meet their housing need targets in the future. By focusing on edge of town and urban area space as opposed to derelict and under utilised town centre BF sites the new LPD does not meet the requirement of the NPPF.
3. It is clear from the NPPF 2018/13 Brown field sites for development should be given priority over GB:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

4. It seems clear to me that the case for 'safeguarding' or indeed for Green Belt land development to meet housing need within the plan period is not met nor is the case for "exceptional circumstances made" and the Local Plan is therefore not sound. Very detailed DATA, relating to "Safeguarded" sites or for GB land development, is within the ECRA submission. (3)
5. It seems odd that in creating a 15 year plan that there is any need at this juncture to remove GB Land to "Safeguarded" status even with a proviso that development of such sites cannot proceed within the plan period. GB predicted Land requirements should be considered as far as this LPSD is concerned at the first review of the new plan more likely in 2025. At this stage there will be much more certainty about any GB requirements dependent on how successful the Council has been in meeting the forecast targets in this plan.
6. The LPSD for 2019 does not really set out the case for "Exceptional Circumstances" (2)
 - It could make better use of Brown Field and underutilised land
 - Much of the growth predictions and the very aggressive employment goals are even now not robust enough to justify the targets set.
 - Most of the GB sites avoid sustainable development issues

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

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

INFRASTRUCTURE CONCERNS

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

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

Residential and Commercial Traffic

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

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

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

below highlight the challenges that residents in Eccleston and the wider public that use the A580 travelling and commuting to Liverpool and Manchester will face.

- Liverpool Super Port. The predictions within the LSP long term planning strategy have the following estimations that by 2030 some 3'000'000 containers per year will be passing through the port – 4 x the 750'000 in 2014!!! These will be 20" and 40" lorries.
- Nearly 60% of the container traffic will be destined for the North West including Merseyside. The amazing growth planned for Warehouses along the M62 and A580 will ensure that huge increases in traffic will be unavoidable no matter where the plan for growth ends up. If the building of 1100 houses by 2035 goes ahead this will only seriously compound the traffic issues. The A580 becomes a motorway that isn't!! Again little mention of how this problem will be tackled including funding is contained within the LPSD.
- Transport for the North estimates there will be around **5'000 HGV's** using the A580 by 2035. These will include for example an increase in Light Goods Vehicles for home deliveries, related to ever growing Internet shopping. In accordance with the National Planning Policy Framework (NPPF 2018) guidelines (para.109) Development must be prevented if there would be "an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
- If we take the dramatic predictions for traffic, both residential and commercial the requirement for new roads and improvements to existing roads may well overwhelm the finance available from St Helens Council to fund what may be required to maintain sustainable development. WHO IS GOING TO FUND THAT COST AND HOW?
- Will the Government legislate and part fund the cost of improved transport infrastructure shared with Developers and the local Council. I will leave that to your own feelings bearing in mind that current funding is nearly 3 times higher in the south compared to the north.
- There are various traffic studies that give pointers to the extent of the ever growing traffic management issues for example finding that Liverpool is one of the most congested cities outside of London and that building new lanes or roads just attracts more and more traffic because of developments such as retail parks and the consequence of that is dying town centres.

Traffic issues in Eccleston

- Within Eccleston with a current population of around 11'000 residents there are no major roads but traditional A roads typical of residential developments and whilst traffic can be quite heavy at peak times there are currently no major issues with congestion except at what is

known as Windle Island which is the main exit crossroad onto the A580 East Lancs road. This includes Bleak Hill road, which forms a direct part of the current traffic chaos during the rush hour.

- Windle Island is currently being further developed at a cost of over £7'000'000 – previously changed about 5 years ago – to accommodate the additional Liverpool Port traffic.
- However without a clear vision of infrastructure needs the increased traffic should theses planned developments be given the go ahead will grind traffic to a standstill gradually getting worse as more and more houses are constructed
- **One of the major sites under dispute 8HS is directly adjacent to Windle Island and the A580 and if the current plan is given the go ahead then this site alone will have by 2050, 1100 new houses built on what is now GB Land. Based on current averages for cars per household in the Eccleston parish at 1.85 estimates are that this will add some 2000 cars within 400 yards of this already congested traffic island, about a 25% increase on current numbers and that's without the additional Super Port traffic.**
- **Currently there are 21'000 vehicles using the A580 every day. This plan proposes to re-designate 8HS as Safeguarded land – removed from its current GB status, but with no development allowed until 2035. More details of this are included within the ECRA Submission.**
- Of course there will be significant increases from Air Pollution, which must be considered before the 8HS plan is concluded. At this time there remains a very significant amount of work to undertake

OTHER INFRASTRUCTURE CHALLENGES

- Health and Education – The IDP fails to give clarity on how the impact on the LPSD will be dealt with, managed and funded.
- GP Services. On Healthcare, although consultation has been made with local CCG's on GP services there is no indication or reference to significant collaboration with St H & K Teaching Hospitals NHS Trust. The IDP gives an overview of the area Whiston and St Helens services but does not go on to say how the LPSD proposals will impact demand and how this demand will be accommodated and funded over the Plan period and beyond.
- The plans provide for Eccleston to have a population increase over the next 15 years of approximately 4500 residents. The new plan does not spell out how these challenges are to be met or outline any strategy as to how these demands will be funded. This fails to meet the NPPF para 8 b) for the social objective in Achieving Sustainable development.

- There is little indication as to how the new plan will deal with the demand for additional school places – trying to cope with thousands more children. (3)
- Flooding has also been identified as a potential hazard on the 8HS site although I would believe that this could be overcome. Again this is covered in more detail in the ECRA submission. (3)
- Then there is the impact on wildlife if Green Belt land is allowed to be developed. Again this is covered in the ECRA documents

SUMMARY OF KEY ISSUES WITH THE REVISED SHLPSD

There are a significant number of key issues that have not been answered by the new LPSD. It is all very fine to have the aspirations that form the core of this new plan for growth but the devil lies in the detail and there is not enough detail to provide any certainty that this plan will deliver over the 15 year period.

A far more realistic approach must be taken – yes to positively grow the town and re-develop its economy – but with goals that are achievable, meets the aspirations of residents already living here, creates an environment that feels like a good place to live and one that retains and respects the green spaces around the town without restricting a realistic growth and development strategy.

These are my summary considerations that support my view that the current revised LPSD should not be approved in its current form.

1. There is clear evidence that the plan is not Legally Compliant
2. The plan fails to fully comply with the Duty to Cooperate - cross border collaboration. (4)
3. The plan is not justified nor will it be effective based on the current exaggerated aspirations based upon using incorrect current data (122)
4. Significantly there are a number of areas where the plan is not consistent with NPPF 2018 guidelines
5. The whole question of Sustainability whether it be transport or houses is conflicted and somewhat vague as well as being based on highly aspirational goals for employment thus population growth and hence the need for very significant housing development. (122)
6. The plan has economic growth predictions – job increases – based on unachievable targets driven again by using historical data. There is undoubtedly room for growth in employment resulting in increased population but nowhere near the predicated targets. The current population of the town has remained almost static for at least 8 years. [1981 population 191'000; 2011 population 176'000] (1)
7. The plan's assessment of Housing Need requirements does not use Standard Methodology to arrive at its forecast and then fails to justify a (2)

case for Exceptional Circumstances. The most recent estimates by the ONS – December 2016 predicts that 383 houses per year will be required to meet the housing needs in St Helens. The Council has chosen to use the older forecasts – 2014 – of 486.

8. The plan fails to satisfy best use of land by failing to address the full and potential use of Brown Field sites particularly around the town centre. There is the question of housing density and affordable housing both of which could ensure significant increases in population around the town centre having a very positive impact with businesses that rely on footfall. This approach would also support those without cars – young and old alike and people on lower incomes. (2)
9. Indeed little mention is made of contaminated Brown Field or Previously Developed land, and this land has not been included in the Brown Field register. The Council, LCRCA and neighbouring Authorities have no plan or policies to bring back “unsuitable sites” to be included in the current Brown Field registers. It is not reasonable to assume these mildly contaminated sites cannot be available within the 15 year plan timescales.
10. The negative impact on agricultural employment and indeed farming as a whole appears to have little consideration. The plan ignores the exceptional quality – grade 1 and 2 – of agricultural land around Eccleston by proposing developments on land that is of such quality. (3)
11. There is little reference to the infrastructure particularly roads and how these will be created to support potentially over 2000 additional cars by 2035. Nor is there any indication about how these will be funded. (6)
12. Severe increases in traffic within the Eccleston/Windle boundaries for the reasons outlined will impact severely on air quality and noise and fails to promote lower vehicle dependency by the growth in edge or out of town developments. (3)
13. The impact on Healthcare and Education is mentioned but not really talked through and any collaboration with the Hospital Trust CCG's or education authorities is invisible. (6)

Clearly a significant amount of work over many months has gone into creating the revised St Helens LPSD. Sadly the plan based on the use of historical data and flawed aspirations will not achieve what is needed to ensure that St Helens is once again a thriving town.

There is nothing more certain than the fact that a more achievable and realistic plan would not require the Green Belt land grab that the Council envisages.

I genuinely hope that the Planning Inspectorate will take full account of St Helens Residents views as a whole and insist and suggest what the Council need to do to revise this significant plan with a more realistic strategic direction.

SIGNED BY

M D GREEN/ACUE

12/3/2019

RO0689



St. Helens
Council

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

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: CATHERINE

Last Name: GREENALL

Organisation/company: _____

Address: 219D LIVERPOOL RD,

HAYDOCK

Postcode: WA11 9RX

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 8/3/19

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.

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

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 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 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.

- These warehouse developments are not justified, there is no proof that there is a need for them, in this position and on this scale. Many empty warehouses on Haydock Industrial estate
- By encouraging this type of development on Greenbelt recycling of derelict land is not being encouraged.
- This development will cause harm to the Greenbelt
- Planning permission has already been granted for 2EA.
- The risk of flooding further down ^{the} Clipsley Brook and along Liverpool Rd. (per drainage channels) will be exacerbated by more developments here.
- High volumes of traffic will add to congested roads

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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



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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.



St. Helens
Council

629

13 MAR 2019

Ref: LPSD

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

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This form has two parts;
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: Catherine	First name:
Last Name: Greenall	Last Name:
Organisation/company: /	Organisation/company:
Address: 219b, Liverpool Rd Haydock	Address:
Postcode: HA11 9RX	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

8/3/19

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)

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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 LPAOS Site 2HA	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"/> Don't know
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

• This development is not justified, the Council needs to prove its population estimates, as the population of St. Helens has been falling since 1981
 • using Greenbelt fails to encourage the use of derelict & urban land.
 • The development will cause significant harm to the purpose of the Greenbelt.
 • Housing in this area isn't sustainable because of lack of school places, doctors surgeries & other services.
 • The access to the site is inadequate and dangerous (East Haves Road) and a junction at Liverpool Rd / Vicarage Road will add considerable traffic onto over stretched roads.
 • Flooding problems - adding greater amounts of water to Clippesley Brook.
 • No liaison with neighbouring 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.

Delete this card from the proposed
removal from the Greenbelt

Please continue on a separate sheet if necessary

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RO0690

641

13 MAR 2019

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St Helens
Council

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: BARRY GREENALL

Last Name: GREENALL

Organisation/company: _____

Address: 219 D LIVERPOOL ROAD

HAYDOCK

Postcode: WA11 9RX

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 6/3/19

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.

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

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for each separate comment/representation.**

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3. To which part of the Local Plan does this representation relate?									
Policy LPA04 2EA SEA 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
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>
<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>There is not proof that these warehouses are needed. Two warehouses have just been built on greenbelt and will employ at least 2500 people. There is already too much congestion and pollution in this area. Residents quality of life is being compromised by development. 2EA has already been built without being taken out of greenbelt. This is not a balanced plan since all warehousing is being built in one area. The council is only interested in Roter Generation and they completely ignore residents views. The goverment said Greenbelt is sacrosanct!!!</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:

To explain in person why this council does not listen to its residents views. It is one of, if not the worst council in the country and that is why the town is in the state that it is.

Also we are told that building on greenbelt is a last resort but this council doesn't understand that!!!

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

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

Please keep a copy for future reference.



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

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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: BARRY

Last Name: GREENALL

Organisation/company:

Address: 219D LIVERPOOL ROAD

HAYDOCK

Postcode: WA11 9RX

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 6/3/19

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.

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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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 <i>LPA05</i> <i>Site</i> <i>2HA</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 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</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p><i>This development is not proven to be necessary, the council are only interested in Rates Generation!!!</i> <i>Housing in this area is not sustainable.</i> <i>The access to the site is dangerous and would cause more congestion and pollution in an already congested & polluted area.</i> <i>There are many brownfield sites available</i> <i>There is too much development in this area already and there are no amenities planned</i> <i>This is not a balanced plan as far as development locations are being proposed.</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

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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.

RO0691



St.Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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>MARGARET</u>	First name:
Last Name: <u>GREENALL</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>10 TUNSTALLS WAY</u> <u>CLOCK FACE ST HELENS</u>	Address:
Postcode: <u>WA9 4QJ</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

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

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

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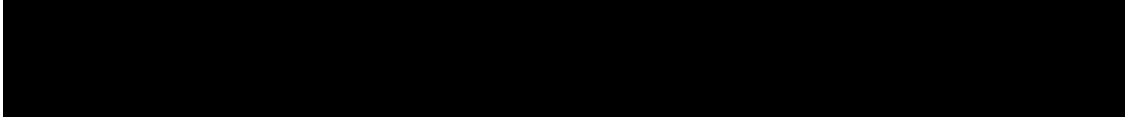
Now please complete PART B of this form, setting out your representation/comment.

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

RO0692



Local Plan
Vicky Gregory
to:
planningpolicy@sthelens.gov.uk
13/03/2019 11:17



1 Attachment



lpsd-representation-form.doc

Please find attached my comments on the local plan.

Kind regards
Vicky Gregory



St Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Victoria	First name:
Last Name: Gregory	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Park Road North Newton le Willows	Address:
Postcode: WA12 9TF	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

13th March 2019

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

Would you like to be kept updated of future stages of the St 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.

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Town Hall
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St.Helens
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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	Policy LPA10: Parkside East	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Y	Habitats Regulation Assessment	Y
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"/> NO
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO

Please tick as appropriate

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

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

- This was never part of the colliery site.
- There is significant public opposition to this proposal.
- There will be an increase in air pollution as this area has limited public transport access and will require

employees to drive to the site.

- This is landscape of great greenbelt significance, there is a beauty to the area, it has a rugged character and charm, it is an area of historical importance and most importantly for natural conservation.
- There has been a lot of work in recent years rehydrating the moss and improving the natural habitat.. Any development near the Moss will have a direct impact on the moss land and the birds and animals that live there and should be preserved for future generations. Furthermore there are listed building on the site that would require demolition.
- It is well used by residents in Newton, Lowton, Golborne and Winwick.
- It is not a Brownfield site and therefore should not form part of the Parkside Development and shouldn't be designated an employment area as there are other areas of the development more suitable. Moreover, the strategic significance of this land is very much dependent upon the success of the other phases of the project.
- **Once it has gone, it has gone.**
- **St Helens has so far not been able to find a Company prepared to build & operate out of a strategic rail freight terminal & this land should not be released only to be used for even more warehousing.**

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.

Agreement not to release the land on the east side of Parkside Road for environmental reasons..

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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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	Policy LPA04 – 8AE: Parkside West	Paragraph / diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Y	Habitats Regulation Assessment	Y
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"/> NO
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO

Please tick as appropriate

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

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

- unsound as it is contrary to strong public objection to the site being removed from Green Belt
- inappropriate development in respect of adjacent residential areas
- the likelihood of significant increased traffic impacts and associated health impacts caused by depreciated air quality.
- The proposed link road may redirect traffic away from Winwick but is not designed to ease the already

critical situation in Newton & on the A49 which is regularly gridlocked.

- Site traffic is also likely to further depreciate air quality in Air Quality Management Areas in vicinity of the site caused by increased traffic levels.
- It is a site of historical significance.

Please continue on a separate sheet if necessary

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

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

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

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

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RO0693

① - LPA04 ② - LPA05 ③ - GGN
 ④ - IDP ⑤ - Para 17.2 DTC

Representor Details

Web Reference Number	WF0351
Type of Submission	Web submission
Full Name	Mr Trevor Gregory
Organisation	
Address	16A Brooklands Road Eccleston St Helens WA10 5HF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Greenbelt Review (2018)

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

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

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

Justified, Effective, Consistent with national policy

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

I believe that this version does not satisfy:

- 1) the requirement for Sustainable development
- 2) the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs
- 3) sustainable housing, targets proposed are based on aspirational employment growth predictions
- 4) effective land use by concentrating on Green Space development over town centre development with higher densities
- 5) food security by ignoring Agricultural Land Quality

In addition, the following fundamental elements of the Plan remain questionable:

- 1) Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan
- 2) Adequate regional and cross border collaboration has not been undertaken
- 3) The Housing Need assessment does not use Standard Methodology and no case for exceptional circumstances has been made
- 4) The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486

③

①

⑤

②

- 5) The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not yet available or included on the Brownfield Register
- 6) The St Helens Council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3170 ha available, if it were to be remediated
- 7) The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered
- 8) The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered
- 9) The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- 10) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquility and general health. It does not promote less vehicle dependency with it's proposals for edge of town developments
- 11) The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities

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

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

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

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

Response Date	3/5/2019 4:00:56 PM
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RO0694

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

Ref: LPSD

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1191
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>ROBERT</u>	First name:
Last Name: <u>GRICE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>14 DOUGLAS AVENUE</u> <u>BOLD, STHELENS, MERSEYSIDE</u>	Address:
Postcode: <u>L19 4LS7</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>16/04/2019</u>
-----------------------	-------------------------

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

☒ Yes (via email)

☐ No

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(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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Telephone: **01744 676190**

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**Now please complete PART B of this form,
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RO0695

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

Ref: LPSD

(For official use only)

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PART A - YOUR DETAILS

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>WINFRED</u>	First name: _____
Last Name: <u>GRICE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>197 LEACH LANE</u>	Address: _____
<u>SUTTON LEACH</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 4PH</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>17.4.19</u>
------------------	----------------------

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

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☐ No

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Town Hall
Victoria Square
St Helens
WA10 1HP**

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1214
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>STEPHEN</u>	First name: _____
Last Name: <u>GRICE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 DOUGLAS AV</u>	Address: _____
<u>BOLD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>17.4.19</u>
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RO0697

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR MR	Title: _____
First Name: Jack	First name: _____
Last Name: GRICE	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: 14 DOUGLAS AVE 1, BOLD, ST HELENS	Address: _____
Postcode: WA9 4SZ	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: 16/04/19
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RO0698

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ALISON</u>	First name: _____
Last Name: <u>GRICE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>114 DOUGLAS AVENUE,</u> <u>BOLD, ST HELENS,</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>W49 1LZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>16/04/2019</u>
-----------------------	-------------------------

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RO0699

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13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>WILLIAM</u>	First name: _____
Last Name: <u>GRICE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 DOUGLAS AVENUE,</u> <u>BOLD, ST-HELENS,</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>17/04/19</u>
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RO0700



St Helens
Council

606

12 MAR 2019

Ref: LPSD

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Representation (i.e. Comment) Form**

(For official use only)

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: CHERYL	First name:
Last Name: GRIFFITHS	Last Name:
Organisation/company: ✓	Organisation/company:
Address: 60, SMOCK LANE GARSWOOD WIGAN LANCS	Address:
Postcode: WN4 0SN	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

7/03/2019

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Yes ☒ (Via Email)

No ☐

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PART B – YOUR REPRESENTATION

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

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

Policy LPA05 HVA	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 checked="" 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 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

please see attached letter.

Box 6

SITE REFERENCE [LPA05] [I HA]

There should be no development on Greenbelt land

- St Helens Council reported that all its Labour councillors had supported the Local plan 2020-2035 under the mantra of Brownfield first

Having read the SHLAA this is not so – as 17 brownfield sites have been dismissed.

To adopt the Brownfield First Approach – no development on

Green belt land should occur until every brownfield site has been identified and built on.

This should include any contaminated land which should be cleaned up and paid for entirely by those developers and house builders that have interests in the borough.

- Having read St Helens population bulletin January 2018

the residential population to date is 178,544 an increase of 833 since 2015. The population churn is comparatively small with 5, 533 arriving in the borough and 4,749 leaving to go elsewhere. The population projections to 2020 is 180,000 to 2030 -185,000 – these are projections only, so why the need for so much development in the borough? When from 2015-2018 the increase in population was 833.

The brownfield sites already identified and using the other 17 sites previously dismissed would surely be sufficient land to cater for present and future housing needs -rather than rip up green fields.

WILDLIFE

The Greenfield site LPA05 [1HA] this site is agricultural land that has been used for arable and pastoral farming and hence creating an attractive habitat for many species of wildlife.

It is also an annual breeding ground for Lapwings a bird which is on the ' Red List' of the BOCC – who reports a 50% decline in their breeding population in the UK.. If the destruction of their habitats continue this bird and many other species will end up on the protected register.

MINING

Development on this site [1HA] would be prohibitively expensive given

- the significant mining in the area in the past :-

Town and country planning [Development plans] Direction 1954 application no 9/2/876 Residential development north of Station Road Garswood.

- National Coal board :-

It may well be considered advisable by anyone contemplating building to make provision -by reinforcement of the foundations or in the general structure of the buildings – to mitigate the effects of ' surface subsidence'

- Water mains run through site 1HA
- Drainage in the area is poor – site 1HA regularly floods in wet weather. The fire service has been called upon on several occasions. Ducks have also been known to swim in the ponds created by the flooding.

INFRASTRUCTURE

Garswood as a village has not the infrastructure in place to facilitate a growth in its population.

- Schools in the area are already full. if the children chose to attend schools nearby in the Wigan Authority, St Helens would have to pay £6000 per annum to educate each child.
- The Surgery is oversubscribed and it is becoming more difficult to get a doctors appointment.
- The roads in and around Garswood are already busy and the volume of traffic and carbon emissions would inevitably increase.
- Site LPA05 [1HA] is not close to the railway station [which is not disabled friendly] or on a high frequency bus route

Developers are still able to force through land hungry green field development even when brownfield options exist often only benefiting their own profits

Without a clear national policy that empowers councils to refuse applications for housing on greenfield land where suitable brownfield exist our countryside will continue to be ripped up at an alarming rate.

Cheryl Griffiths



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)

<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:

I do not wish to participate at the oral examination - but would like to be present at the public hearings.

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.