

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO0701 - RO0800

SEPTEMBER 2020



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

Ref: LPSD 0 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

we will contact you by your postal address.

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)		
	Title:		
	First name:		
Last Name: GRIFFITHS	Last Name:		
Organisation/company: RETIRED	Organisation/company:		
	Address:		
Annual III III III III III III III III III I	Postcode:		
Tel No:	Postcode: Tel No:		
	Mobile No:		
	Email:		
	Date: 18-4-2019		
Signature:	Date.		
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be e.		
Nould you like to be kept updated of future s namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and		
Yes (via email)	☐ No		
Please note - email is the Council's preferred m	nethod of communication. If no email address is provided,		

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

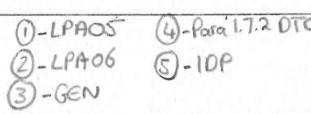
We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

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Council

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Denise	First name:
Last Name: Griffiths	Last Name:
Organisation/company:	Organisation/company:
Address: 41 Prestbury Drive Eccleston, St Helens	Address:
Postcode: WA10 5RB	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.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the	V
Inspector's recommendations and		
Yes xx (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.

Policy	Paragraph / diagram / table	1 2	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
	ments (please name and relevant)					
Please read	onsider the St Helen the Guidance note for	expla	anations of Le	Plan 2020-2035 is:	ne Tests of Soundness	
Legally Con	npliant?	Yes		No.	x□	
Sound?		Yes		No:	No x□	
Complies with the Duty to Y		Yes		No	No x□	
Please tick as						
If you cor Please read :	sider the Local Plan the Guidance note for	is <u>ur</u>	nsound, is it	because it is not: e Tests of Soundness		
Positively P	repared?	TI				
Justified?		x				
Effective?		Ιx□	1		THE REPORT OF THE PARTY OF THE	
Consistent v	vith National Policy?	The second second				
or fails to co	mply with the duty to	0 000	perate. Plea	se be as precise as	compliant or is unsound possible. Plan, please also use thi	

amount of land needed is not as great as that which has been set out in the Local Plan. As such, there is therefore no exceptional circumstance to justify change to Green Belt boundaries. Other reasonable alternatives have not been fully explored ie. the use of lower target figures and using more previously developed land which would have a much lower impact on the environment. Additionally, there seems to be limited consultation and cooperation with other

local councils in order to publish a statement of common ground.

The Plan makes no reference to Brownfield sites and PDL that are not yet available or included on the Brownfield Register.

The St Helens Council statement of Contaminated Land sites (2015) indicates that 3,170ha of the lowest priority contaminated land exists in St Helens yet 2 Green Belt sites of over 200ha are being reclassified as safeguarded land sites and are included to satisfy the housing need instead of redeveloping this contaminated land.

There appears to be no policy in St Helens or the Liverpool City Region to address the need to bring unsuitable sites which are outside the Brownfield Register back into use. We cannot continue to ignore such land yet destroy agricultural and green belt land to satisfy a plan which is flawed.

The Borough suffers from long term, difficult traffic issues at A580 Windle, Bleak Hill Road and — M6/A580 junction 23. The Infrastructure delivery plan makes reference to current road improvements but fails to outline how local and borough wide improvements would be made and funded. Traffic growth as a result of the plan would cause severe traffic issues in an already saturated area.

The Plan bases development on the edge of town where public transport links are limited and, as such, it does not promote less vehicle dependency.

8HS is an unsuitable site for development as it is in close proximity to the increasingly busy and polluted A580, the narrow roads adjacent to the area cannot sustain the increase in traffic, it is currently agricultural land and the local schools are already over-subscribed

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 include Green Belt land on the edge of town as safeguarded or allocated sites for housing development in preference to town centre development or the development of contaminated land.

8HS should be changed from the safeguarding for development category and maintained as Green Belt

		*
		Please continue on a separate sheet if necessa
up ioc epi fte	ase note your representation should cover so porting information necessary to support / just dification, as there will not normally be a subst resentations based on the original representations for this stage, further submissions will be of matters and issues he/she identifies for ex	stify the representation and suggested sequent opportunity to make further ation at the publication stage.
If	VOUR representation is seeking a modification	
e	oral part of the examination? (the hearings in	n; do you consider it necessary to participate a
e	No, I do not wish to participate at the oral examination	yes, I wish to participate at the oral examination
If	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral
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If	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If	No, I do not wish to participate at the oral examination you wish to participate at the oral part of the to be necessary:	Yes, I wish to participate at the oral examination examination, please outline why you consider

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: DEBBIE	First name:
Last Name: GRIMES	Last Name:
Organisation/company:	Organisation/company:
Address: 26 CRAWFORD ST.	Address:
Postcode: WAG LXQ,	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: ((-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 fu	ture stages of the St Helens Borough Local
Plan 2020-2035? (namely submission of t	
Inspector's recommendations and adoptio	
Yes (Via Email)	No 🗔

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Title: MA	Title:
First Name: SEAN	First name:
Last Name: SEAN Council	Last Name:
Organisation/company:	Organisation/company:
Address: 26 CRAWFORD ST.	Address:
CLOCK FACE	
Postcode: WA9 4XQ	Postcode:
	el No:
	obile No:
	mail:
Signature:	Date: (- 3- 19.

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Inspector's recommendations and adoption	
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Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Representor Details

Web Reference Number	WF0209
Type of Submission	Web submission
Full Name	Miss Alisha Grimes
Organisation	N/A
Address	2 CRAWFORD STREET
	CLOCK FACE
	ST HELENS WA9 4XQ
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	Relates
Paragraph / diagram / table	
Policies Map	Relates
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	Relates
Other documents	

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

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

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

Positively prepared, Justified, Effective

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

In support/agreement with the comments made by the Bold & Clock Face Action Group.

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

In support/agreement with the comments made by the Bold & 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?

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:

In support/agreement with the comments made by the Bold & Clock Face Action Group.

Response Date	3/11/2019 8:40:10 PM

Council

(D-Green Belt Review 2018 (D-Local Plan Proffered Options Report of Consultation 2015)

PF0863

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1 3 MAY 2019

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(we will correspond via your agent) Title: Mc	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 91 CAVIN MILL ROAD	Address:
Postcode: UNS 7TY	Postcode:
	Tel No:
	Mobile No:
	Email:
	E-WHEN HER BURNESS AND A STREET
Signature:	Date: 12, 5, 19

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No

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

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11/05/19

Dear Independent Inspector.

I write to you as a resident aboundary with Site AC06 Barrows Farm which is subject to a proposed re-designation from greenbelt in the St. Helens Local Plan.

Firstly, I will start by providing you with a brief history of developments at the farm as a preface to my arguments and hopefully this will give you a base of knowledge with regards to how the Council have previously permitted development on this green belt land and also how they are now utilising this as a reason for reclassification of the land by way of a boundary anomaly.

Barrows Farm's history is predominantly that of a working farm, its history in Billinge reaches back many years and residents have lived harmoniously with this agricultural business on their doorstep. Unfortunately due to reasons I am unaware of the farm was sold and converted into an equine riding centre making use of some of the existing farm buildings and also some new development on site to build stables and an indoor riding arena. I remember the development well as the construction of the new buildings is on the boundary of the farm few years the riding centre closed its doors and the new owners with objection from local residents opened up a 5 a side football pitch inside of the riding arena, this was later followed by planning applications to build changing rooms and the change of land to use as an outdoor football pitch. The remaining buildings on site have been crudely converted to house small businesses ranging from local builders, exercise and fitness facilities, furniture showrooms and other small businesses. As you can probably imagine these enterprises have had a significant effect on local people and have individually caused different local issues which have been contested by residents over the years. St Helens Council have permitted with one exception a series of 'retrospective' planning applications. The impact upon the community and visitors is significant particularly with regards to road safety and noise, numerous residents believe that the authorities are failing in their duties.

With the brief history of the site in mind I will now explain why I believe the St. Helens Local Plan — requires 'modification' with site AC06 retaining its current status as green belt land. As you are aware the attempt to reallocate this land as Brown Belt has only come about due to a so called 'anomaly of boundary'. I have questioned this anomaly from the beginning as I am unsure where this anomaly arises. Further to that I have also consulted the document 'St Helens Borough Local Plan 2020-2035 Green Belt review Dec 2018' which defines roads as strong boundary features. Carr Mill Road is the current boundary, therefore a "strong" and recognisable boundary exists. Page 152 of this document has a heading 'Correction of Green Belt Anomalies'. Within section 6.5 it states that "the opportunity has been taken to identify other (mainly small) areas where corrections are required to the existing Green Belt boundary. These are areas where the boundary needs to be rationalised for example where it does not follow readily identifiable features on the ground". Section 6.6 states that "it is recommended that a number of further minor adjustment are made to the existing boundary, some of which require small areas to be released from the Green Belt to create a more robust and justifiable boundary".

1

(1)

I believe that not only have the council incorrectly defined an anomaly of boundary they have also been particularly misleading in the process. Originally this came to light as part of the Draft Local Plan. Reference to Barrows Farm was not contained within the main document but was only given mention within the appendix under the name 'location 10'. The reason for moving the boundary in this document was stated as "The current green belt boundary includes a number of dwellings and

business outlets in this location, and follows no visible boundary on the ground. As this site is already significantly developed, it is recommended that the Green Belt boundary be realigned to follow the rear of the existing outbuildings". The Planning Department allowed the very development upon green belt land that it now hopes to be the reason for the reclassification of that land and furthermore reclassify a significant parcel of open land and so lead the way to yet more inappropriate use!

Now that I have had time to read and process these documents I am now completely bewildered as to how or why any reclassification of boundary is necessary as I have already stated a strong and immoveable boundary already exists and the new proposed boundary has far less integrity than the one that is currently in place. Legislation states that "a green belt boundary can only be moved in exceptional circumstances" and to use the reference of dwellings existing within the Green Belt as a reason to redefine the boundary is ridiculous particularly when the authorities have permitted the construction of such buildings on land designated green belt. Carr Mill Road has dwellings all along the east boundary and these properties all currently sit within the Green Belt. Any reclassification of green belt land will be a further degradation of the local green belt and further contribute to a prolonged and sustained series of failures by the St Helens council planning office to adhere to the principles of green belt in Billinge and across the borough. The proposal in the Local Plan relating to Site ACO6 is not just a shift in a boundary line, it is the reclassification of a large piece of land as Brown Belt, something that the wording about Site AC06 fails to mention or make clear, reference to a map elsewhere in the Appendix is necessary to understand what is proposed and such makes the Planning Department's consultation process "unsound" as it contravenes the principles of the St. Helens "Statement of Community Involvement". The electorate across the borough has registered its disquiet about such green belt issues in both the recent Town Council and Parish Council elections.

I must also draw the inspector's attention to another failure regarding site AC06 inclusion in the Local Plan. Residents made 'representations' against the reclassification which were not considered before the council voted to accept the 'Local Plan' as the document 'Local Plan Preferred Options-Report of Consultation- Dec 2018' contained absolutely no mention of local residents opposition to the removal of Green Belt land at AC06. I believe that this means the council carried out that vote illegally and that the council has not followed its own 'Statement of Community Involvement'. This is clearly another mistake on the council's part that the inspector should take into account when assessing whether the 'Local Plan' is legal and sound.

Green Belt land should not be sacrificed in this way. Green Belt should be protected and nurtured at every opportunity, there are alternatives with numerous barren & derelict sites close to the town centre which would be far more suited for development and to help regenerate the town. Further to this I refer to case law such as 'Gallagher Estates v Solihull Ltd' and request that the Government Inspector considers the implications of such case law aware and the legal precedents that would seem to make the proposed re-designation of green belt land at site ACO6 not 'legally compliant'.

There are many complexities regarding the AC06 site and I request that the Government Inspector visits the location. I believe that will help the inspector understand the issues experienced by residents and visitors alike. One of those issues that has plagued residents since development started at Barrows Farm is traffic. The roads in and out of site AC06 are completely unsuitable for any volume of traffic and this is something that has been exacerbated by the coming and going of travelling football teams and other users of the site as the facilities are hired out for a range of activities, noise is another issue. On Carr Mill Road is a large Primary School and Nursery plus a

residential school. Much of Carr Mill Road is in effect a single lane carriageway with substandard footpaths. The Planning Department and Highways Department have recognised the inherent dangers in the past but not in more recent times and in my opinion (and others) are failing in their duty of care. Reclassification of Site AC06 would facilitate yet more inappropriate development and only compound these issues. In have witnessed first-hand a number of near misses with streams of vehicles departing from the site and heavy goods vehicles making deliveries on a daily basis at a time when parents are negotiating the unsafe road and pavements with young children and prams. There is a very real danger of someone being seriously injured or killed due to the road conditions and the increased volume of traffic. I believe a visit to the location is necessary to gain an appreciation of the issues and hope that a visit from the Inspectorate would initiate a full 'independent' review of the Barrows Farm planning history.

(1)

Yours faithfully

Mr. Robert Grundy

12/5/19

EL0090

() - LPA06

2- Para 1-7.7

green belt CllrBGrunewald

to:

planningpolicy

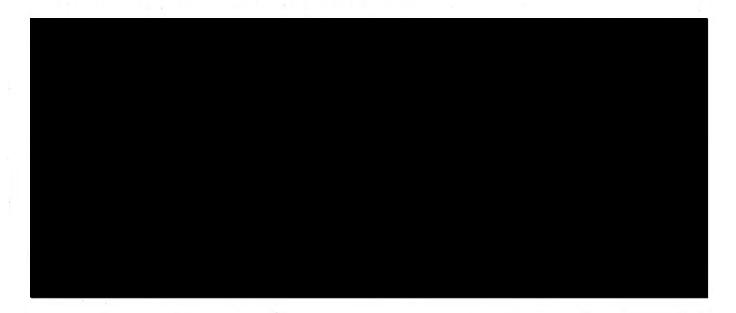
12/03/2019 12:31

1 attachment



Green belt letter.doc

My response to local plans I'm happy for it to be published







Planning Policy Team St.Helens Council Town Hall St Helens

Town Hall Victoria Square St Helens Merseyside WA10 1HP

Rainhill Ward Councillor

11th March 2019



The following comments are made in response to consultation on the St. Helens Local Plan Preferred Option Report

I deplore this Government's changed policy that requires all local councils to assign even more land for development into at least a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land across Rainhill.

I wish to place on record that it shares residents' concerns that the proposal would:

Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;

Have a detrimental effect on highway safety, for vehicles and pedestrians alike; increase the pressure on schools and nurseries, which are already over-subscribed;

Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;

Exacerbate existing health problems for residents, due to increase vehicle pollution; and increase air pollution

Be detrimental to residential amenity, due to the loss of Green Belt.

I also believes that the proposed Halsnead Village development in Knowsley will add pressure to existing infrastructure and services, once it starts to be developed, and we are on record as expressing our concerns on several occasions and asking St Helens Council to prepare for the consequences of Knowsley Borough's action.

Therein no statement of common ground with neighbouring authorities

70

Yours faithfully

Councillor Barrie Grunewald Rainhill Ward Councillor

Representor Details

Web Reference Number	WF0028
Type of Submission	Web submission
Full Name	Mr John Gwilliam
Organisation	
Address	117b Higher Lane,
	Rainford,
	St Helens WA11 8BQ
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LP A05: Meeting St.Helens Borough's
	Housing Needs
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, 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.

Objection to St Helens Local Plan proposals for release of parcel 8HA/GBP-19A

The plan proposes the release of the land for residential development. Having studied the Green Belt Review, I contend that this proposal is based on flawed and erroneous reasoning, leading to unjustified conclusions.

Whilst the procedures for identifying suitable land to be released from the Green Belt have merit, they inevitably suffer from the lack of measurable elements. The final choice is made on the basis of highly subjective 'scores' which I do not accept. These are meant to reflect the relative merits of a wide variety of land parcels in respect of the purposes of the Green Belt. Beyond stating that I believe that the 'calculations' are incorrect I will simply give my opinion on the value of the parcel in qualitative terms.

Firstly I suggest that the inherent value of the parcel, as a component of the green belt, is higher than suggested. Although it is, indeed, well defined by its boundaries, it is also large enough to not be dominated by them. It is also on a considerable slope, allowing distant views of St Helens, Knowsley and beyond. It thus contributes significantly to the 'openness' of Rainford itself and helps to separate Rainford from its surroundings. Again, though well bounded, it is quite obviously 'part' of the countryside nearby.

Secondly, I suggest it is an important part of the green break between Rainford and St Helens. It is certainly a good distance from the obvious edge of St Helens proper at the A580, but close examination of the map, and on the ground, will show that this nominal separation has already been seriously compromised over the years by ribbon development along the A570, factory developments around Sandwash Close and more lately the golf course. I fear the proposed development will simply take this deterioration one step closer to eventually linking Rainford with St Helens completely. This would obviously be counter to national Green Belt policy.

Thirdly, it is recognised that the land is high quality Grade 1 agricultural land, which would be a notable loss for the area. Nearly all the Grade 1 land in St Helens is around Rainford, and should be kept for agriculture. The justification for the use of this parcel is partly based on the fact that all the alternatives around Rainford are also grade 1 – but the fact is that there is no good reason for such a large development in Rainford at all! The Rainford infrastructure just about supports the existing community, and such a substantial increase would simply cause problems. An argument is made that all the St Helens green belt land is much the same, so it doesn't matter which part is lost. This is not the case, as the land mapping clearly shows that land in the Rainford area is clearly of better quality than in other more southerly parts.

- **7. Please set out modification(s) you consider are necessary** parcel 8HA/GBP-19A should NOT be released from the Green Belt.
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	3/13/2019 4:56:53 PM

Representor Details

Web Reference Number	WF0029
Type of Submission	Web submission
Full Name	Mr John Gwilliam
Organisation	
Address	117b Higher Lane,
	Rainford,
	St Helens WA11 8BQ
Agent Details	

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

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- **7. Please set out modification(s) you consider are necessary** parcel 8HA/GBP-19A should NOT be released from the Green Belt.
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	3/13/2019 4:51:31 PM

Representor Details

Web Reference Number	WF0100
Type of Submission	Web submission
Full Name	Mrs Sheila Gwilliam
Organisation	
Address	117b Higher Lane,
	Rainford,
	St Helens WA11 8BQ
Agent Details	

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

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Policies Map	
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Environmental Assessment	
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Other documents	

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

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Justified, Consistent with national policy

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

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

I believe the proposals for the development of land in Rainford (Ref 8HA) in the Local Plan are unjustified. My reasoning is as follows.

Firstly, the plan miscalculates the requirements for housing by exaggerating the potential for growth in St. Helens, where the population has been falling for the past 40 years. Many residents (including myself) arrived during the last surge of building in Rainford in the 60s, though our have largely moved elsewhere to find employment. Rainford is one of the most pleasant and popular areas of St Helens and it seems unjust and foolish to spoil one of the better areas of the town, which otherwise offers little enough by way of countryside, open spaces, fields and woodland, by significantly increasing the population. More residents would also require a significant number of new jobs, which are neither available nearby nor planned.

Other potential local developments must also be considered. West Lancs council are proposing extension to Skelmersdale and very large developments near Burscough, putting increased pressure on local infrastructure – notably traffic routes to Liverpool, Manchester and other places south via the A570 Rainford Bypass. The notorious Windle junction is currently undergoing very expensive

modifications, yet will still have no satisfactory pedestrian and cycle crossing, and I see no prospect of improvement in its poor accident record. As a consequence of this work, we currently have a foretaste of increased traffic along Higher Lane and other Rainford roads, caused by traffic diverted from Crank Road, which is temporarily closed. Especially between 3pm and 6pm the effect on residents who live on these roads is particularly unpleasant.

Sadly, St Helens is blighted by vast areas of brownfield sites from previous industry, which could easily provide the space for required housing. In an area of high unemployment, poor health and with a high rate of brain-drain of our youth to the south it would be better policy to clean up derelict old factory land rather than to destroy forever a significant proportion of the small area of Grade 1 agricultural land in the borough. During the last war the fertile fields of south Lancashire produced a vital contribution to the food supply of the nation. Though the proportion of home-grown food is now worryingly greatly reduced we need to halt this trend to protect ourselves as much as we can from deteriorating world conditions. We must also look to the future consequences of climate change – the whole world will need to grow as much food as possible. Those who live in favourable temperate zones such as ours have a special responsibility in this regard. The government itself is slowly recognising the importance of food supply security by promoting the most efficient use of good agricultural land to grow food crops, rather than losing it to building development. Rainford residents pay relatively high council taxes, so further developments here would no doubt provide useful additions to the St Helens budget, but this should not be a consideration when drawing up planning schemes. This on top of the fact that the land in dispute is currently Green Belt, which National Planning specifically states should not be developed except in 'Very Exceptional Circumstances'; such circumstances do NOT include shortages for housing allocation.

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:



Rainhill Green Belt (Eccleston Park Golf Club) Malcolm to: planningpolicy@sthelens.gov.uk

09/03/2019 18:46

Sent from Mail for Windows 10

From:-Malcolm Hadwin 2 Manor Avenue, Rainhill, Merseyside L35 OOP

ST. HELENS LOCAL PLAN (RAINHILL GREEN BELT)

Regarding the current proposal to remove the area of land, formerly occupied by Eccleston Golf Club, from the Green Belt.

Although plans to build on this land have seemingly been put off until 2035, I wish to point out the detrimental effect that any building will have on the community of Rainhill.

Requirement.

Are these houses really necessary? The area as a whole seems to be losing population and there have been thousands of new houses built in nearby Warrington, Widnes and Liverpool. Apparently brown field sites exist to meet any local demand that might exist.

Infrastructure.

With over 900 houses, even at a low projected occupancy level, this could mean around 3000 people and 2000 cars. This will load even more traffic on Rainhill Centre particularly the two sets of lights on Warrington Road (jcn Rainhill Road and Longton Lane.) There has been a raft of roadworks in this area recently to try to improve the traffic flow. 2000 extra cars would be chaotic. Especially when coupled with the extra building in Prescot such as Halsnead Park.

Today it took me over 2 minutes to get from my estate exit road onto Warrington Road, even then I had to barge my way on. This was in a quiet period (1.30pm).

The occupants of these new dwellings may want to commute from one of the rail stations (as encouraged by government). Eccleston and Rainhill have very little parking and Lea Green often gets full so more and more cars will be "abandoned" in side roads and footpaths etc causing a nuisance to all and helping to hinder traffic flow even further.

Services.

Rainhill is not blessed with one of those new Health Centres.
and the other practice that I am aware of is based in a small unit near the village
centre. Can they cope with 3000 extra people.

and have to wait 6 weeks. The same question applies.

Environment

It is apparently the intention of local government to retain the autonomy of such communities as Rainhill and to avoid an urban sprawl. The building on Eccleston Golf Club would effectively join Rainhill to Thatto Heath and hence to St Helens.... i.e. Urban Sprawl.

All the aforementioned problems will cause extra pollution. We need Green Belts to break down this pollution and provide fresh air. It supports wild life and offers a pleasant environment for people to relax and enjoy.

Conclusion

The above represents the dangers that I see will exist **if** building is allowed on Eccleston Golf Club. It has supposedly been recognised that these problems exist hence the decision to put back building to 2035. The question is therefore "why remove it from the Green Belt"? It makes no sense. No sense unless the plan is to quietly proceed with building once the land has been released, in which case there would be a lot of anger in the local community.

The Green Belts were put there for a purpose – they should not be touched.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

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

I via your agent)		
		Title: pars
		First Name:
		Last Name:
pany:	Us form	Organisation/company:
		Address:
		Postcode: WA9 HQ
		Tel No:
		Mobile No:
		Email:
7 -		Signature:
9		Email:

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:

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

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

PART B - YOUR REPRESENTATION

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

		Policies	esentation relate?	111-1-11-1
Policy	Paragraph / diagram / table	Мар	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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4. Do you c	consider the St Hele	ens Borough Local	Plan 2020-2035 is:	and the second second
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7. Please set out what modification(s) you consident compliant or sound, having regard to the matter yearlates to soundness (NB please note that any no incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text. P	ou have identified at 6. above where this in-compliance with the duty to cooperate is il need to say why this modification will make e helpful if you are able to put forward your
Please note your representation should cover su supporting information necessary to support / just modification, as there will not normally be a subse representations based on the original representat After this stage, further submissions will be of on matters and issues he/she identifies for ex	tify the representation and suggested equent opportunity to make further tion at the publication stage. In at the request of the Inspector, based
8. If your representation is seeking a modification the oral part of the examination? (the hearings in	; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of the this to be necessary:	examination, please outline why you consider
Please note the Inspector will determine the most who have indicated that they wish to participate at Thank you for taking the time to complete Research Please keep a copy for the complete Research Please keep a copy for the complete Research Please Rese	at the oral part of the examination plete and return this response form.



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Part B - Your Representation(s).

13 MAY 2018

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: W	Title:
First Name:	First name:
Owen	
Last Name:	Last Name:
Haines	
Organisation/company: Tunstalls Farm	Organisation/company:
Address:	Address:
Postendo III O O	Dostando
Postcode: WA9 4Q) Tel No:	Postcode: Tel No:
Mobile No:	Mobile No:
Email:	Email:
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Please be aware that anonymous forms cannot be comments to be considered you MUST include you	
Would you like to be kept updated of future : Plan 2020-2035? (namely submission of the Plan Inspector's recommendations and adoption of the Plan Plan Plan Plan Plan Plan Plan Plan	an for examination, publication of the
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferred naddress is provided, we will contact you by you	

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

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P

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mc	Title:
First Name: Stephen	First name:
Last Name:	Last Name:
Organisation/company: Tunstaus	Organisation/company:
Address:	Address:
Postcode: WA9 HQ)	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date:
lease be aware that anonymous form omments to be considered you MUST	s cannot be accepted and that in order for your include your details above.
Plan 2020-2035? (namely submission	of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption of the Plan)
Inspector's recommendations and ac	
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St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

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01744 676190

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

1 3 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: MRS	Title:
First Name: MONICA HALE	First name:
Last Name: HALE	Last Name:
Organisation/company:	Organisation/company:
Address: HAMBLETON CL. Postcode: WAS USN.	Address:
Postcode: WIDNES LISH.	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.

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

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Page 1 of 1

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Representation Form Jenny Russell planningpolicy@sthelens.gov.uk

13/03/2019 12:43 Hide Details

1 Attachment



Representation Form.pdf

Ηi,

Please find attached Representation Form for Policy LPA06 (3HS)

Thanks

Jenny Russell



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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Andrew	First name:
Last Name: Hall	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 6 Sudbury Gardens, St Helens	Address:
Postcode: WA9 5FS	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12 /03 / 19

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Plan 2020-2035? (namely submis	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the
Inspector's recommendations and	l adoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Counci address is provided, we will conta	il's preferred method of communication. If no e-mail ct you by your postal address.

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Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment
		s (please nan levant part/s					

4. Do you consider the St He Please read the Guidance note		2020-2035 is: Ompliance and the Tests of Sound	ness
Legally Compliant?	Don't know	Don't	
Sound?		No X	
Complies with the Duty to		No X	
Cooperate			

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?	X		
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</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

- The increase in population of 3HS will increase the amount of road users around the areas of Rainhill Road, Portico Lane and Two Butt Lane. Currently this road network is very busy at peak times with queuing traffic. Not only would the increase in traffic cause further delays, it would also increase the air pollution for local residents as well as increasing wear and tear upon the roads, which in turn would increase the council's maintenance costs. With the increase of additional road users this could also affect pedestrian safety
- The local area around 3HS currently does not have the amenities to support the proposed increased in housing of 3HS. The new development would have an impact

upon local residents use of doctors, dentists, A&E and schools. There is also a lack of activities for younger residents such as youth clubs which could result in more young residents which could increase anti-social behaviour putting an unnecessary burden on an already stretched police force

- 3HS is the only area of Green Space which boarders a number of surrounding towns such as Whiston, Rainhill and Portico, Nutgrove, Eccleston Park and Thatto Heath. To lose this green space would result in the joining of all these areas resulting in mass urban sprawl
- Since the closure of the golf course the area around 3HS has become a hub for natural wildlife, with 13 protected species having been identified in a short amount of time. It would be indecent and immoral to remove such defenceless wildlife from their natural habitat

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 not act upon the proposed removal of this land from Green Belt into Safeguarded status and the land should remain as Green Belt permanently

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

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

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

Please keep a copy for future reference.

I give explicit permission for my name to be used in this responce. * Jenny Russeu. 2/3/19 * PHILIP CHURCHIC 2/3/19 · K Russell 12/3/19 SandrawRIGHT 12/3/19

We have worked together on this responce



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Ref: LPSD

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

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title
First Name: KISTY	Title:First name:
Last Name: HALL	Last Name:
	Organisation/company:
Address: 35 booths blow 10.	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25/2/19.
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be ve.
Vould you like to be kept updated of future so namely submission of the Plan for examination, doption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred make will contact you by your postal address	nethod of communication. If no email address is provided

RETURN DETAILS

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3. To which p	oart of the Local Pla	an does this repre	sentation relate?	
Policy UA 05 SITE 1HA	diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Sound?			Yes Yo	
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Please tick a	s appropriate			
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8. If yo	our representation is seeking a modification oral part of the examination? (the hearing	ntion; do you consider it necessary to participate at ngs in public)
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

If you wish to participate at the this to be necessary:	e oral part of the examination, please outline why you conside

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0 1 MAR 2019
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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: KIRSTY	First name:
Last Name: HALL	Last Name:
Organisation/company:	Organisation/company:
Address: 35 BOOTHS BROWLD. ASHTON-IN-MAKEKFIELD Postcode: WNY ONG	Address: Postcode:
Posicode. Wiv glog	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25219.

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

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Victoria Square
St.Helens
Merseyside
WA10 1HP

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15050

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

.C. See - 1 7 7 .d

1 1 1165 W 12

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4. Do you Please recoperate Cooperate Please tick	u consider the St F ad the Guidance no compliant?	lelens Borou	ions of Leg	al Compliance and the No 🗆	Tests of Soundness				
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Cooperate Please tick	te	Yes 🗆		No 🖭	No 🖭				
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Please continue on a separate sheet if necessary

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110	Title:
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First Name: Notice 1	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 29 FIELD ROAD	Address:
CLOCK LIXCE	
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11/3/19
Please be aware that anonymous forms can considered you MUST include your details a	nnot be accepted and that in order for your comments to be above.
	ire stages of the St Helens Borough Local Plan 2020-2035? Ition, publication of the Inspector's recommendations and
Yes (via email)	☐ No
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	ments (please name and relevant part/secti	on)		
	consider the St Helen and the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Cor	mpliant?		Yes No	
Sound?			Yes No	
Complies w	with the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
Positively Positively Positive?			f the Tests of Soundness	
or fails to If you wis use this	o comply with the du sh to support the leg box to set out your c	ty to cooperate. <u>F</u> al compliance or omments.	cal Plan is <u>not legally co</u> Please be as precise as possible as possible coundness of the Local I	ossible. Plan, please also
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related incapa the Lo	iant or sound, having regard to the note to soundness (NB please note that able of modification at examination).	onsider necessary to make the Local Plan legally matter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.
		Please continue on a separate sheet if necessary uccinctly all the information, evidence and supporting esentation and suggested modification, as there
vill not not permits with the control of the contro	mally be a subsequent opportunity to a straight in the publication stage. stage, further submissions will be or she/she identifies for examination.	make further representations based on the original nly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at
	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
	wish to participate at the oral part of be necessary:	f the examination, please outline why you consider

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

Please keep a copy for future reference.

RO0719

1 3 MAR 2019



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

Ref: LPSD

(For official use only)

Representation (i.e. Comment) Form

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Colette	First name:
	Last Name:
	Organisation/company:
	Address:
Postcode: WAG 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: [[]] 1 9
Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.
Nould you like to be kept updated of future s namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-20357 , publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred r	method of communication. If no email address is provided

we will contact you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	Paragraph/	Policies	Sustainability	Habitats
	diagram table	Мар	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
A MAN TO SERVICE	uments (please name and relevant part/secti	on)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Co	mpliant?		Yes No	
Sound?			Yes No	
Complies v	vith the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
Please re Positively F Justified? Effective?	repared?		f the Tests of Soundness	
6. Please ç			cal Plan is not legally co	
If you wi		al compliance or	Please be as precise a	
	My VIEWS ACTION (C) FACE A GROUP	ARE IN C	INE WITH BO	D AND CLOCK

compliant or se relates to soun incapable of m the Local Plan	ound, having regard to the m dness (NB please note that a odification at examination). legally compliant or sound.	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your r text. Please be as precise as possible.
		Please continue on a separate sheet if necessary
will not normally be representation at the After this stage, fur and issues he/she 8. If your represer	a subsequent opportunity to nee publication stage. rther submissions will be on identifies for examination.	sentation and suggested modification, as there nake further representations based on the original ally at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ngs in public)
No, I do n	ot wish to participate examination	Yes, I wish to participate at the oral examination
9. If you wish to p this to be neces		the examination, please outline why you consider
	pector will determine the most vish to participate at the oral p	appropriate procedure to adopt to hear those who have

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

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1800848M

RO0720





St Helens Borough Local Plan 2020-2035 (Submission Draft) 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 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent) Title:	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 6 KEWIN CLOSE GALSWOOD, WIGAN	Address:
	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: <u>20-2-1</u> へ
Please be aware that anonymous forms cann considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	I No
Please note - email is the Council's preferred we will contact you by your postal address.	d method of communication. If no email address is provided,

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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 pa	rt of the Local	Plan does this	representati	on relate?	
Policy LPA OS SITE IHA	Paragraph/ diagram table	Policies Map	, A S	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please nam relevant part/se	l l			
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Legally Compl	iant?		Yes	☐ No	
Sound?			Yes	☑ No	
Complies with	the Duty to Cod	perate	☐ Yes	☑ No	
Please tick as	appropriate				
		Plan is <u>unsound</u> note for explanati		se it is not: sts of Soundness	
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Justified?					
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Consistent with	n National Policy	/?			
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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.
	Please delate this land from the proposed removal from
	the market
	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 examination

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

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

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

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1 3 MAR 2019

Ref: LPSD

(For official use only)

Council

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PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title: MRS	Title:		
First Name: JOAN HALL	First name:		
Last Name: HALL	Last Name:		
Organisation/company:	Organisation/company:		
Address: 6 Kelvin Close Gossocod, Wigan Postcode: WN4 OUD	Address:		
Postcode: WN4 OUD	Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature:	Date: 20-2-19		

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

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Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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01744 676190

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

PART B - YOUR REPRESENTATION

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

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Policy	LPA	Paragraph		Policies		Sustainabilit	У	Habitats	
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docume	ent and	relevant							
part/sec	ction)								
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Greenbalt.									
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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.					ke
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

RO0721



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

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173 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: MS	Title:
First Name:	First name:
SAM	T. AM
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 5z1 Clock	Face Rd Address:
clockface	
Postcode: WAQ 4	T = Postcode:
1 00:00 00:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 26/3 19
Please be aware that anonymous formments to be considered you M Would you like to be kept upda Plan 2020-2035? (namely subm	Date: 26/3/3 forms cannot be accepted and that in order for your UST include your details above. ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the
lease be aware that anonymous formments to be considered you M Would you like to be kept update of the properties of th	forms cannot be accepted and that in order for your UST include your details above. ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the plan adoption of the Plan)
Please be aware that anonymous formments to be considered you M Would you like to be kept upda Plan 2020-2035? (namely submanus linspector's recommendations and Yes (Via Email)	forms cannot be accepted and that in order for your UST include your details above. ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the

RO0722



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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JoriN	First name:
Last Name: HALL	Last Name:
Organisation/company:	Organisation/company:
Address: 10 CRAWFORD STI CLOCK FACE ST. ITELENIS	Address:
Postcode: WAGK KQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11. 3. 2019.

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

Would you like to be kept updated of future	
Plan 2020-2035? (namely submission of the P	
Inspector's recommendations and adoption of	
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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or by hand delivery to:

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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

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

RO0723

Representor Details

Web Reference Number	WF0323
Type of Submission	Web submission
Full Name	Mr Stephen Hall
Organisation	
Address	39 Hall street
	Clock Face, St Helens WA9 4XN
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?

5. 10 Willest part of the Local Flam does this repres	remarion relate.
Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	Destruction of habitat
Other documents	

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

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

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

Justified

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

Land to the rear of Crawford st and adjacent to gorsey lane.

Willful destruction of wildlife habitat nesting skylarks a protected species on the red list of species in decline.

Already happening by putting horses in said field to graze knowingly trying to force the birds from the field as they need a open field with realativly long grass

Prior to putting horses in the field there was at least 5 breeding pairs and there is no alternative close by that offered that type of habitat

There was also hunting barn owls regularly in an evening but since the horses have been there no sign of the owls also no sign of the brown hares that used to be seen regular, so the landowner/developer has achieved what they set out to do

Which is knowingly and willfully destroying a important habitat.

All in the sake of profit.

Plenty of brownfield sites and land other than greenbelt could be used Plenty of empty houses in and around st Helens.

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

The habitat should be protected.

And species allowed to return I have walked these fields for 30 plus years and the last 3-4 years have been the worst I have known it with regards to wildlife.

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

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

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

Response Date	3/6/2019 5:51:08 PM

RO0724

Representor Details

Web Reference Number	WF0479
Type of Submission	Web submission
Full Name	miss sarah Hall
Organisation	
Address	22 Bembridge close, great sankey warrington WA53RH
Agent Details	

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

Yes (via e-mail)

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

or to which part of the Local Flan does this representation relate.			
Policy	St. Helens Borough Local Plan Policies Map		
	Introduction (INCLUDING MAP INDEX &		
	LEGEND); Page 1-5; Page 6-10; Page 11-14; Page		
	15-18; Page 19-22; Page 23-25; North of Borough		
	Map; South of Borough Map;		
Paragraph / diagram / table	south plan		
Policies Map	1EA		
Sustainability Appraisal / Strategic			
Environmental Assessment			
Habitats Regulation Assessment			
Other documents			

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

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

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

Effective

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

the plan does not reflect the existing removal of green belt in the are of 1EA. this should ink upon with up with warrington and Omega who have failed to engage effectively with the local community and minimise the ecological impact the warehousing developed on this existing site. there are currently newly developed speculative warehousing and distribution built on the site immediately adjacent to the proposed development. the access is all through the junction 8 (WBC), how will the development of this land pay back to warrington residents affected by the further development of more warehousing with the associated noise and ecological impact. these businesses make big money and I cannot see how this is reinvested in the community infrastructure or more importantly green space attached to the developments.

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

there should be agreed development of 'green paths' and a proper corridor for nature including maintenance and development of appropriate green space, thus will enable a better quality of life for local residents, animals, insects and ecology!

warehousing developed after the speculative sites have been filled, this will reduce any transport increase and improve the lives of local residents and the environment...!

omega challenged to better engage with local residents near to the site and not be allowed to get away with tiny trees and shrubs as a replacement for the green area removed, benefitting local residents and ultimately the planet!

no one claiming any of progress should be stopped but planning should adequately challenge and ensure that where this warehousing /employment there should be consideration given to the environment and local residents (either in warrington or st helens) Omega has produced glossy brochures and not much glossy greener or community engagement.

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	2/13/2019 12:22:26 PM

RO0725



St Helens Local Plan - Representation Form N Hallsworth to: planningpolicy@sthelens.gov.uk 12/03/2019 22:29

1 Attachment



lpsd-representation-form.doc

Dear sirs

Please find attached Representation Form.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: Mrs	Title:
First Name: Sylvia	First name:
Last Name: Hallsworth	Last Name:
Organisation/company: N/A	Organisation/company:
Address:	Address:
154 Two Butt Lane	
Rainhill	
Prescot	Postcode:
Merseyside	
Postcode:L35 8PT	
*** I GIVE EXPLICIT PERMISSION FOR MY	
NAME TO BE USED IN THIS RESPONSE:	
Nicole Hallsworth	_
Kayleigh Hallsworth	-
rayicigii i ialiswortii	-

Tel No:	Tel No:								
Mobile No:	Mobile No:								
Email:	Email:								
Signature:	Date: 10/03/2019								
comments to be considered	ymous forms cannot be accepted and that in order for your dyou 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 Post) 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 complete 2019 by:	ed form to us by no later than <u>5pm on Wednesday 13th March</u>								
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 do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

in line with our Information and Records Management Policy. For more information on what we Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph	3HS	Policies		Sustainability	/ X	Habitats	
,		/ diagram		Мар		Appraisal/		Regulation	
		/ table		•		Strategic		Assessment	
						Environmenta	al		
						Assessment			
Other documents (please name							1		
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	Yes □Don't know			No ☐ Don't know		
Sound?			Yes	Yes □			ο□Х		
Complies with the Duty to			Yes	Yes □			No □ X		
Cooperate									
Please tick as appropriate									
		r the Local Pla							
Please read the Guidance note for explanations of the Tests of Soundness									
Positive	ly Prepar	ed?		X					
Justified?				\square X					
Effective?				$\square X$					
Consistent with National Policy?									
6. Please give details of why you consider the Local Plan is not legally compliant or is unsound									

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

- St Helens Council continually state they are "committed to its brownfield-first policy". We strongly feel no green belt land should be developed until every brownfield site is built upon.
- Table 4.6 shows a level of need for 7245 houses. The Council's brownfield register suggests there is capacity for 5808 houses. Therefore, an extra 1437 houses and 57

hectares of extra land is required; not the 288 hectares as demonstrated in table 4.5

- No statement of common ground between neighboring authorities has resulted in a number of new housing developments within a 2.5 mile radius of 3HS (EPGC); delivering a total of over 3550 residential dwellings. The development of 3HS will increase this figure to almost 4000 new dwellings.
- The increase of dwellings in the area is not sustainable. There is already a lack of school places, doctors and dental surgeries and hospital and A&E facilities are stretched to full capacity.
- With mass de-industrialisation since the early 1980's, higher unemployment and St Helens not attracting any significant private sector investment, many residents have to travel outside of the borough to work.
- Road infrastructure around 3HS consists of two B roads, Rainhill Road and Portico Lane and one C road, Two Butt Lane. These roads currently struggle to support existing levels of traffic; extra cars that would come with these homes would cause "traffic chaos".
- Rainhill has one A road, Warrington Road (A57), which services the above plus the additional developments. There is little scope to accommodate predicted increases' in traffic, causing further congestion misery.
- The increase in traffic will impact the smaller surrounding estates, affect pedestrian safety and increase noise and air pollution.
- The 2011 Census suggests that the health of the residents of St Helens is generally worse than in the average person in England (Source: Office for National Statistics) and Public Health England compared the health of people in St Helens area to the rest of England as significantly worse than England average. Between 2013-2015 St Helens averaged 51.9 deaths per 100,000 from respiratory disease compared to the North West average of 44.3 and the national average of 33.1
- Green space is an important environmental asset for local communities, it serves as a green lung particularly in otherwise built up areas and ultimately this land can improve the quality of life for local residents.
- 3HS acts as a natural green buffer that separates the areas of Whiston, Eccleston Park,
 Thatto Heath and Rainhill. Development would create an area of urban sprawl.
- Development of 3HS will adversely impact the local ecology, including more than 13 protected species of flora and fauna.
- We are concerned about the wider impact on dwellings on this land and the impact on existing watercourses. 3HS is a confirmed zone 2 and 3 flood zone with an extremely high water table. Losing this flood zone will place properties along the existing brook at risk of flooding.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consi compliant or sound, having regard to the matter relates to soundness (NB please note that any rincapable of modification at examination). You will the Local Plan legally compliant or sound. It will suggested revised wording of any policy or text.	you have identified at 6. above where this ion-compliance with the duty to cooperate is will need to say why this modification will make be helpful if you are able to put forward your
The council should delete this land from the therefore abiding with the National Planning	
The council should not consider removing the safeguarded.	is land from greenbelt to place in
Please note your representation should cover so supporting information necessary to support / jumodification, as there will not normally be a substrepresentations based on the original representations will be on matters and issues he/she identifies for expressions.	stify the representation and suggested sequent opportunity to make further ation at the publication stage. only at the request of the Inspector, based
8. If your representation is seeking a modification the oral part of the examination? (the hearings in	
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 this to be necessary:	examination, please outline why you consider
Please note the Inspector will determine the mown who have indicated that they wish to participate	
Thank you for taking the time to complete Please keep a copy	and return this response form. for future reference.

*** I GIVE EXPLICIT PERMISSION FOR MY NAME TO BE USED IN THIS RESPONSE: Nicole Hallsworth Kayleigh Hallsworth



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

Ref: LPSD

1 2 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	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: mR	Title:
First Name: WILLIAM	First name:
Last Name: MALLS WORTH.	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 13 st. James Road, Rainhill, merseyside Postcode: L35 OPB	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 08.03.19

comments to be considered you MUST include your details above.

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes x⊠ (Via Email)	No 🗌
Please note - e-mail is the Council' address is provided, we will contact	s preferred method of communication. If no e-mail t you by your postal address.

Now please complete <u>PART B</u> of this form, setting out your representation/comment. Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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

3. To w	hich part	of the Local I	Plan doe	es this repres	entation relate?			
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
		(please nan levant part/se						

4. Do you consider the St He		
Legally Compliant?	Don't Know	mpliance and the Tests of Soundness Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

	is <u>unsound,</u> is it because it is not: 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 <u>not legally compliant or is unsound</u> <u>or 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

- St. Helens Council register suggests that there are brownfield sites which would accommodate 5808 houses.
- Proposed site (3HS) is a green buffer separating Whiston, Eccleston Park, Thatto Heath and Rainhill.
 Removing this greenbelt will create a continuous area of urban dwelling and a road intrastructure
 peing able to support it.
- The increase in traffic will affect all surrounding areas, Whison, Prescot, Eccleston Park, thatto heath and Rainhill which already have a road infrastructure that already struggles and could not be improved to accommodate the volume of traffic that both sites would bring.
- Rainhill village junction (junction between Warrington Road and Rainhill Road) is confirmed with by
 the council at being at capacity. From experience it can take over 15 minutes (at peak time traffic) to
 pass through the village, this offers no scope for improvement.
- Peak time traffic already affects smaller B and C roads in roads such as Blundells Lane, Mill Lane,
 wew Road, St. James road which are used as cut through to avoid congested main roads in both
 Rainhill and Whiston. These roads where not made to cope with the traffic they currently receive
 and this will only get worse by the proposed Halsnead Village Development.
- Air Pollution is already high in the area the increased traffic will only add to this. From experience
 we no longer walk the school run (less than 1 mile) along Warrington Road due to the smell (and
 raste) in the air during peak times.
- The borough of St. Helens already averages 51.9 deaths per 100,000 from respiratory disease in the under 75's this compares to 44.3 for the rest of the North West.
- Further housing is not sustainable in the area due to lack of schools, doctors, dental surgeries, hospitals and A&E. It's unsure how these will cope with the increased population the proposed sites will bring.

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.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

4 3 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mas	Title:
First Name: MAT HALSALL.	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 55 + CLOCK FACE PAR,	Address:
Postcode: NA9 HUQ.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date:
Please be aware that anonymous forms cannot be comments to be considered you MUST include you	e accepted and that in order for your our details above.
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Pl Inspector's recommendations and adoption of the Plan 2020-2035?)	an for examination, publication of the he Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferred r address is provided, we will contact you by you	nethod of communication. If no e-mail r postal address.



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

Ref: LPSD

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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

1. Your Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

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

Title: mR	Title:
	First name:
Last Name: HALSEY	Last Name:
Organisation/company:	Organisation/company:
Address: 19, AVONDALE RE	OAD Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 4 MARCH 2019
Please be aware that anonymous forms car considered you MUST include your details a	nnot be accepted and that in order for your comments to be above.
	ure stages of the St Helens Borough Local Plan 2020-2035? ation, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferre ve will contact you by your postal address.	ed method of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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 Pla	an does this repre	sentation relate?	
Policy PADS Site 21+A	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Cor	mpliant?		Yes No Z	DON'T KNOW
Sound?	- A		Yes 🗸 No	
Complies w	vith the Duty to Cooper	rate	Yes 📈 No	
Please tick	as appropriate			
	onsider the Local Plane ead the Guidance note		because it is not: f the Tests of Soundness	
Positively P	repared?	A		
Justified?		A		
Effective?		V,		
Consistent	with National Policy?	Z/		
or fails to If you wis use this	o comply with the du sh to support the leg box to set out your c	ty to cooperate. Pal compliance or someonts.	cal Plan is not legally co lease be as precise as p soundness of the Local I	ossible. Plan, please also
2. 3. 4.	Le bollowing Air Pollu- Lavolity of Traffic Greenhelt Common Gross	f life {	nove details in attached (v	in the sheet

St. Helens Borough Local Plan 2020 – 2035 (Submission Draft) Representation Form
Part B continuation from Mr. D.I. Halsey; 19, Avondale Road, Haydock, Lancashire. WA11 0HJ

Q6, contd.

- 'Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate

1. Air Pollution

Other councils in the North West and elsewhere are implementing policies to reduce air pollution from road traffic emissions. However this proposal to build houses on Florida Farm South will only add air pollution to that generated by the developments on Florida Farm North and potentially from the EA7 and EA6 developments.

Therefore this proposal does not comply with a duty to cooperate, nor is consistent with

national policy.

2. Quality of Life

There has been a massive increase in house building in the 'North' Haydock area over the last 15-20 years e.g. Princess Pit (Great Delph / Little Delph), but without any corresponding increase in roads, schools, doctor surgeries, dentists. The building of 522 or even 400 houses at Florida Farm South, and householders cars, will only exacerbate these problems

(a) extra car journeys on the already congested Haydock roads (A599 - the only route through

Haydock)

(b) children having to attend schools outside the area, by car

(c) waits for doctors' or dentists appointments even longer.

Hence this proposal is 'not balanced', and does not 'Safeguard or enhance Quality of Life'.

3. Traffic

(i) The proposal for 400 houses at Florida Farm South will increase car traffic and hence :

(a) add to the already congested traffic generated by the Florida Farm North developments at

the junction of Haydock Lane (S) and the A580

(b) produce rat-running through the new estate and Avondale Road, which is already experiencing extra and speeding traffic (cars and construction lorries) to avoid the above congestion.

(ii) The proposal includes a junction at Vicarage Road / Liverpool Road - an intersection (on a bend)

that is already dangerous.

4. Greenbelt

The release of this Greenbelt does not encourage the recycling of derelict and other urban land. The Council's comment regarding 'isolated Greenbelt areas' is totally illogical and opposes the 'purposes of the Greenbelt'

5. Common Ground

There is no statement of common ground with neighbouring authorities.

Therefore this proposal is not 'Effective'.

4th March 2019

	Delete Shis land from the Greenhelt.	The proposed removal from
		Please continue on a separate sheet if necessar
mati not n	on necessary to support/justify the repres ormally be a subsequent opportunity to n	section and suggested modification, as there make further representations based on the original
rmati not n reser er thi issu	on necessary to support/justify the represormally be a subsequent opportunity to nation at the publication stage. s stage, further submissions will be on the stage identifies for examination.	sentation and suggested modification, as there make further representations based on the original ally at the request of the Inspector, based on matter ation; do you consider it necessary to participate a
rmati not n reser er thi issu	on necessary to support/justify the represormally be a subsequent opportunity to nation at the publication stage. Is stage, further submissions will be on the she identifies for examination. It is seeking a modification is seeking a modification.	sentation and suggested modification, as there make further representations based on the original ally at the request of the Inspector, based on matters ation; do you consider it necessary to participate a

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

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

Please keep a copy for future reference.



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

Ref: LPSD

- 1 MAR 2018

(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).

01 MAR 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 47 STATION DAS Postcode: WN4 05 D	Address:
Postcode: WN4 OSD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 23.22019

	of future stages of the St Helens Borough Local of the Plan for examination, publication of the option of the Plan)
Yes (Via Email)	No 🗌

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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NEXT STEPS

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

PART B - YOUR REPRESENTATION

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Policy Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				
Do you consider the St Helens Please read the Guidance note for			Tests of Soundness	
Legally Compliant?	Yes 🕅	No C		
Sound?	Yes	No K		
Complies with the Duty to Cooperate	Yes	No 🗷	No 🗷	
Please tick as appropriate				
	is unsound is i	t hecause it is not:		
5. If you consider the Local Plan				
5. If you consider the Local Plan Please read the Guidance note for				
5. If you consider the Local Plan Please read the Guidance note for Positively Prepared?	explanations of th			

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

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road and 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. 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.

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 note your representation should cover su supporting information necessary to support / just modification, as there will not normally be a subst representations based on the original represental After this stage, further submissions will be of on matters and issues he/she identifies for ex-	tify the representation and suggested equent opportunity to make further tion at the publication stage.
8. If your representation is seeking a modification the oral part of the examination? (the hearings in	
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of the this to be necessary:	examination, please outline why you consider

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

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

Ref: LPSD

- 1 MAR 2018 (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

0 1 MAR 2019

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name:	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 47 STATION RE	Address:
Postcode: WN40 BD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 28.2.2019
Please be aware that anonymous forms canno omments to be considered you MUST includ	e your details above.
Would you like to be kept undated of futi	
Would you like to be kept updated of fut Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption	e Plan for examination, publication of the

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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	IHS	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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Sound?			Yes 🗆	Nox	
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Please continue on a separate sheet if necessary

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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; the oral part of the examination? (the hearings in	
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	e oral part of	the examination	, please outline	e why you conside	r
this to be necessary:					

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

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

Please keep a copy for future reference.

Representor Details

Web Reference Number	WF0298
Type of Submission	Web submission
Full Name	Mr Gordon Hand
Organisation	
Address	13 Rufford Road
	Rainford St Helens
	Merseyside
	WA118JX
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	HA8
Policies Map	HA8
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

It is blatantly obvious this land HA8 at Rooney Lane should not be built on. It is totally unnecessary as St Helens has many blown field sites available to support housing for years to come. The only reason it is being considered is financial end off. Nice fresh field in a nice area is a dream for the people making money out of this and nice expensive houses in this area will bring in more tax for the councils as well. So to ruin our village on the grounds of money and profit for the money men is so wrong. You will have read all the objections on other grounds which I totally agree and won't bother you with again. Green belt should be a very very very last resort in only the most exceptional circumstances to build on not to line a few pockets.

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

The St Helens council should be made to use ALL the brown field sites available in the area before any greenbelt is considered and if the developers profits aren't as high then so be it.

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

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

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

Response Date	3/8/2019 3:29:09 PM



OBJECTION LETTER
Cathrine Benyon
to:
planningpolicy

planningpolicy 13/03/2019 14:00

1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

See attached objection letter to St Helens Council Local Plan in relation to development of 'Eccleston Vale'.

Regards,

Cath Benyon



Catherine Hanwright 56A, The Oaks, Houghtons Lane Eccleston St Helens WA10 5LD

Reference: St Helens Local Plan

Dear Sirs,

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

It would appear figures from 2014 are bring used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016,383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Hs of land for housing.

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

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the exiting Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound.

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.



The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.



The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requirements 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.



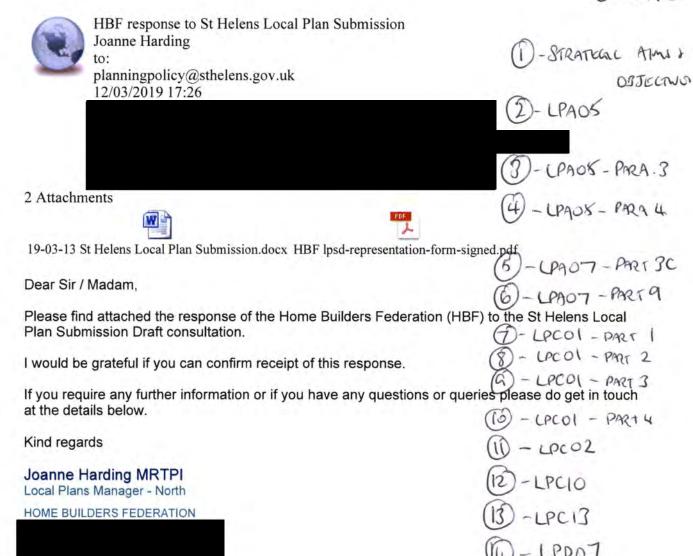
In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Catherine Hanwright

ELO112



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

Ref: LPSD

(For official use only)

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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1. Your D	Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Mrs	Title:
First Name	: Joanne	First name:
Last Name	Harding	Last Name:
Organisatio	on/company: HBF	Organisation/company:
Address:	HBF House 27 Broadwall London	Address:
Postcode:	SE1 9PL	Postcode:
Signature:		Date: 13/03/2019

Would you like to be kept upda Plan 2020-2035? (namely submis Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🗹 (Via Email)	No 🗌
Please note - e-mail is the Counc address is provided, we will conta	s preferred method of communication. If no e-mail t you by your postal address.

RETURN DETAILS

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post to:

Local Plan

St.Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

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		Please continue on a separate sheet if neces
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Local Plan St Helens Council Town Hall Victoria Square St Helens WA10 1HP

SENT BY EMAIL planningpolicy@sthelens.gov.uk 13/12/2018

Dear Sir / Madam,

ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members.

Vision and Objectives

The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as s et out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.



The HBF considers that the policy should be modified as follows:

4.1 To enable the delivery of sustainable communities by identifying land to increase the supply for a sufficient number and range of new dwellings.

Policy LPA05: Meeting Housing Needs

The HBF does not consider that Policy LPA05 is sound, as it is not positively prepared, justified, or consistent with national policy for the following reasons:

Part 1: Housing Requirement

This policy states that over the period 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. However, this is a decrease from the previous consultation version of the document which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year, which does lead to queries as to why the sudden change in housing requirement.

The 2017 draft SHELMA identified a range of OANs for St Helens from 397 (economic baseline) to 855 (economic growth) dwellings each year, with a demographic based need of 416 dwellings each year. The Economic Growth reflects the jobs growth which could result from development projects and policies which are expected to be implemented over the study period.

The 2019 SHMA Update calculates the OAN using the standard methodology for the period 2018-2028 utilising the 2014-based household projections it identifies a figure of 482 dpa for the period. It is noted this has decreased from the 504 indicative housing need identified by the standard methodology for the period 2016-2026.

The 2019 SHMA Update also considers a number of economic scenarios aligned with planned economic growth in the Borough, as set out in the St Helens ELNA. The ELNA identified a number of growth scenarios two of which - Scenario 2 and Scenario 3 - were considered most likely to come forward and are therefore considered in the SHMA. Economic Scenario 2 results in a need for 514 dpa, whilst Economic Scenario 3 results in a need for 479 dpa (for the period 2016 to 2033).

The HBF consider that given the evidence contained within the draft SHELMA and the St Helens ELNA, and the Liverpool City Region Growth Deal1 that the Council should consider an uplift in the housing figure above that provided by the Standard Methodology.

It is noted that in February 2019 MHCLG published updates to national planning policy and guidance including the standard method for assessing housing need. The standard method proposes to continue to use the 2014-based data, adjusted to take account of affordability to calculate a minimum annual housing need figure. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a housing market that delivers 300,000 homes. The HBF would therefore recommend the Council to take an approach that continues to

¹ The HBF also notes evidence collated by AMION on behalf of one of our members also identifies higher levels of jobs growth than that set out in the Council's evidence.

ensure flexibility, adaptability and ensure that the Council is appropriately contributing to the Government's aspiration to boost the housing land supply and delivery of homes.

The HBF considers that the policy should be modified as follows in order to make the document sound:

 Further consideration is given to the housing requirement to ensure it provides an appropriate balance between jobs and homes and supports the Government's aspirations for housing delivery.

Density

This policy looks for new development to achieve a minimum density of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30dph on sites in local centres, sites that are well served by bus or train services and in other urban areas.

The HBF consider that this part of the policy would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site.

The HBF considers that the policy should be modified as follows in order to make the document sound:

'Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area Densities below those set out above may be considered appropriate where local variations in housing need, local characteristics, site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives'.

Monitoring and Supply

The HBF support the Council in monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and sufficient supply to provide the relevant 5-year supply plus the appropriate buffer.

Allocations and Supply

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

Policy LPA07: Transport and Travel

The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination.

Policy LPC01: Housing Mix

The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:

Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. It is noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Part 3 of this policy requires at least 5% of new homes on greenfield sites of 25 or more homes to be bungalows. The reasoning for this requirement is unclear, whilst the 2016 SHMA identifies that there is typically a demand for bungalows (paragraph 10.29) this assertion is not supported by specific evidence of need. Whilst the 2019 Update to the SHMA actually states that is difficult to quantify a need/demand for bungalows. Furthermore, the policy applies to all greenfield sites without









differentiation in terms of location, the character of the area or reference to the densities set out within Policy LPA05. The provision of bungalows may also impact upon viability. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows.

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Part 4 of the policy provides a viability clause. The HBF supports the inclusion of this element of the policy as it provides flexibility to deal with site specific circumstances. The inclusion of this part of the policy should not, however, be used to justify other unsustainable requirements as noted above.

(6)

The HBF considers that the policy should be modified as follows in order to make the document sound:

- '1. New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by: relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA); site characteristics; viability; and local aspirations'.
- *2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:

 a) at least 20 % of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and b) at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). If the standards in Part M4(2) or Part M4(3) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above."
- The HBF recommends that part 2 of the policy is deleted unless evidence can be provided to support the requirements. If it is to be retained, the HBF would recommend that the following additional text is included 'In seeking to apply this standard, the Council will take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable.

 To enable developers to factor in these additional requirements the Council will introduce this policy one year from the adoption of the Local Plan.'
- 43. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows. The Council will support the provision of bungalows and will take this provision into account when considering the density of the site.

Policy LPC02: Affordable Housing

The HBF does not consider that Policy LPC02 is sound, as it is not justified or consistent with national policy for the following reasons:

This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable homes where there are on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

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The HBF does not dispute the need for affordable housing within St Helens and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The Council will need to confirm that this policy is viable, through its evidence.



It is noted within the Viability Assessment 2019 that there are issues with the viability, for example with greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. It is noted that one site remains unviable at 35dph, with the others having very narrow margins of viability and when consideration is given to not only the 30% affordable housing requirement but also to the cumulative impacts of the polices within the Plan the situation is worse.



The HBF considers that the policy should be modified as follows in order to make the document sound:

 Further consideration is given to the viability of the affordable housing requirements.

Policy LPC10: Trees and Woodland

The HBF does not consider that Policy LPC10 is sound as it is not justified for the following reasons:

This policy states that where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio. The HBF would like to know what the justification and evidence is for this ratio of replacement. It is considered that if the Council are seeking a 'net environmental' gain that this could be achieved in many other ways than seeking a 2:1 tree ratio. The HBF recommends that this part of the policy is deleted.



The HBF considers that the policy should be modified as follows in order to make the document sound:

• 6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period'.

Policy LPC13: Renewable and Low Carbon Energy Development

The HBF does not consider that Policy LPC13 is sound, as it is not justified or consistent with national policy for the following reasons:

Part 4 of this policy states that proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s).

The HBF does not generally object to encouragement for the need to minimise the carbon emissions, or the inclusion of renewable or low carbon energy sources, however, it is important that this is not interpreted as a mandatory requirement. The HBF consider that any mandatory requirements would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015. The HBF recommend that the Council ensure that this policy is justified and consistent with national policy. The potential cost of the requirements of this policy needs to be taken into consideration. There are concerns that requirements such as these could lead to the non-delivery of homes in areas where development is intended to be focused. The HBF considers that this requirement should be removed.

Policy LPD07: Digital Communications

The HBF does not consider that Policy LPD07 is sound, as it is not justified, effective or consistent with national policy for the following reasons:

Subject to the requirements of Policy LPA08, contributions may also be sought from developers towards the cost of providing necessary off-site fast broadband infrastructure to serve the area.

The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF (2018) establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

The HBF consider that in seeking to provide broadband the Council should work proactively with telecommunications providers to extend provision and not rely on the





development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks. It is not considered appropriate for St Helens to seek additional local technical standards over and above this requirement.



Future Engagement

I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.



Yours sincerely,

Joanne Harding Local Plans Manager – North

RO0733







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

Ref: LPSD

0 7 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;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

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

Title: M.C.	Title:
First Name: NEVILLE	Title:First name:
Last Name: HARDAAA	Last Name:
	Organisation/company:
Organisation/company.	<u> </u>
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 7 March 2019
Please be aware that anonymous forms of considered you MUST include your detail	cannot be accepted and that in order for your comments to be above.
	uture stages of the St Helens Borough Local Plan 2020-2035? ination, publication of the Inspector's recommendations and
Yes (via email)	X No
Please note - email is the Council's prefe we will contact you by your postal addres	erred method of communication. If no email address is provided, ss.

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.

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Policy 8 HS	Paragraph/ diagram table		Policies Map PAGES 9-10	App Strat Envi	ainability raisal/ tegic ronmental essment		Habitats Regulations Assessment
	uments (please nan and relevant part/s						
	consider the St He					d the Tes	sts of Soundness
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Sound?				Yes	X No		
Complies with the Duty to Cooperate				Yes	☑ No		
Please tick	as appropriate						
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Justified? Effective?			X				
	with National Policy	u2	X				
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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.

DELETE THIS LAND FROM ANY PROPOSED DEVELOPMENT

Please continue on a separate sheet if necessary

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

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

8. If 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

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.

RO0734



Safeguarded Land between Houghtons Lane and Crantock Grove P and A Hardy

to:

planningpolicy@sthelens.gov.uk 25/02/2019 20:08

With regard to the recently published St Helens Local Plan.

I was pleased to see that a number of sites had been removed from the previous plan but still object to the Houghtons Lane and Crantock Grove land being Safeguarded for future development. As an Eccleston resident I have seen a substantial amount of building work already carried out in the area. The increase in population has already had a major impact on the local facilities eg schools which are already having to expand and GP surgeries which are full to capacity. The volume of traffic has increased drastically which has resulted in overcrowded roads and increased accidents.

I feel that the possibility of any future development on Green Belt land should be stopped altogether to prevent the additional strain of the above issues. There are other Brownfield sites

I feel that the possibility of any future development on Green Belt land should be stopped altogether to prevent the additional strain of the above issues. There are other Brownfield sites now available in the St Helens area which should be developed upon without having to include Green Belt land.

I would be grateful if you would consider my comments before proceeding with the proposals.

Regards

Ann Hardy



Virus-free. www.avg.com

RO0735

Representor Details

Web Reference Number	WF0303
Type of Submission	Web submission
Full Name	Mr Paul Hardy
Organisation	
Address	14 Pinfold Drive
	Eccleston
	St Helens
	Merseyside
	WA10 5BS
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	LA05
Paragraph / diagram / table	8HS
Policies Map	·
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	1-

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

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 Infrastructure Development Plan (IDP) fails to explain the impact on Healthcare and Education. There is no indication or reference to collaboration with the Hospital Trust, local GP surgeries or education authorities which are already full to capacity. The plans to extend Bleak Hill School will only cater for current requirements. There are already concerns as to how existing patients are going to manage to park at the new medical centre at Millfields which has only been built to serve the existing numbers of local residents. The A&E department at Whiston is currently being extended due to its increase in patients. The IDP does not indicate how additional increases in numbers are going to be provided and funded.

The Borough has already got significant problems at Windle Island and surrounding areas which will continue to increase with the additional traffic generated by the Florida Farm and other major developments taking place. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road enhancements are to be made and funded. Any increased housing will definitely result in unacceptable and severe impacts on our road networks which I feel will create an unacceptable impact on highway safety.





I do not feel that the Local Plan is effective, I think it is unnecessary to give up green belt land when so much brownfield land is available within the borough. The plan should look to develop those brownfield sites with the housing developers. The negative impact of building on farming land has also not been considered, why build on productive farmland and destroy this valuable local asset. It is also land that is enjoyed regularly by local residents who use the numerous footpaths.

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

Retain all Green Belt land long term eliminating any requirements for safeguarded sites. Develop only on the readily available Brownfield sites and reassess whether the Economic growth predictions are based on flawed historical data.

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	3/7/2019 8:13:12 PM
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RO0736

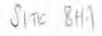


St Helens Local Plan Representation - site HA8 Rookery Lane Rainford Mark Harley

to:

planningpolicy@sthelens.gov.uk

11/03/2019 18:19



D- LPAOS

COL DIC

Hello.

My Wife and myself would like to strongly object to the St Helens Local Plan specifically to site HA8 Rookery Lane Rainford.

Mark Harley & Jacqueline Scott-Harley 4 Green Lane Rainford St Helens WA11 8EJ

The reasons for our representations and objections are as follows.

In respect of the overall figures in the Plan;

- · there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- · the level of land needed is therefore not as high as set out in the Local Plan
- · therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

259 houses is a huge development. It could put 1,000 extra cars on Rainford's roads with implications for air



W(0)47

pollution, congestion and road safety. Higher Lane is already a busy road and, at certain points, dangerous. The recent Windle Island roadworks at the Rainford bypass/East Lancs Road junction has proven how dangerous this could be with several reports of accidents resulting in death. Rainford Village has also seen a significant increase in traffic which is not sustainable and also dangerous as drivers use the village as a bypass whilst the roadworks are being completed.

(D)

This will have a negative impact on local schools, business's, surgeries etc which are already running at more than 100% capacity.

We trust our representations and objections will be reviewed.

I look forward to hearing from you in due course.

Regards, Mark Harley & Jacqueline Scott-Harley

Representor Details

Web Reference Number	WF0487
Type of Submission	Web submission
Full Name	Mr Mark Harley
Organisation	n/a
Address	4 Green Lane
	Rainford WA11 8EJ
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	Rookery Lane/Higher Lane.
Paragraph / diagram / table	8HA 9EA
Policies Map	Rookery Lane/Higher Lane.
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Rookery Lane/Higher Lane.

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.

If the council used the latest population predictions there would be no need to build on green belt land anywhere in St Helens. Rookery Lane/Nunnery Lane would be saved from unscrupulous fat cat builders/housing developers who intend to pollute our rural community with cheap, battery hen affordable houses that will contribute to an increase in crime in an otherwise peaceful area. 259 houses is a huge development. It could put nearly 1,000 extra cars on Rainford's roads with implications for air pollution, congestion and road safety. Higher Lane is already a busy road and, at certain points, dangerous. The recent Windle Island roadworks at the Rainford bypass/East Lancs Road junction has proven how dangerous this could potentially be with reports of deaths. Rainford Village has also seen a significant increase in traffic which is not sustainable and also dangerous as drivers use the village as a bypass whilst the roadworks are being completed.

This will also have a negative impact on local schools, business's, surgeries etc which are already running at more than 100% capacities.

The field in question is grade one agricultural land - and in use. The farmer who rents the land says the loss of the field would have a significant impact on their business. We should be protecting our Agricultural Land and business's. Removing these and replacing with unnecessary developments will have significant implications on our children and future generations as these areas of land become more & more scarce.

The field also has past history of flooding, has due diligence been applied?

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

I strongly object to this or any plan that impacts grade 1 agricultural land in Rainford being used for un-necessary housing/industrial development.

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

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

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

Response Date	1/25/2019 3:58:50 PM
nesponse bate	1,23,2013 3.30.30 1 11

RO0737



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

010 13 MAY 2019

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title: MRS	Title:		
First Name: KATHRYN HARR	First name:		
Last Name: HARRIS	Last Name:		
Organisation/company:	Organisation/company:		
Address: 25 Hall Street Clock face Sk velens Postcode: What XN	Address: Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature:	Date: 11.3.19		

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

Would you like to be kept updated Plan 2020-2035? (namely submission Inspector's recommendations and accommendations)	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the option of the Plan)
Yes 🗹 (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	oreferred method of communication. If no e-mail rou by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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.

	nich par	t of the Local P		prese		
Policy	X	Paragraph / diagram / table	Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	nt and	nts (please nam relevant	е			
4. Do yo	ou cons	ider the St Hele	ns Borough Lo	cal Pla	an 2020-2035 is:	e Tests of Soundness
Legally			Yes 🗆	Logu	No E	7
Sound?			Yes 🗆		No E	✓
Complie Coopera		the Duty to	Yes 🗆		No [X
Please tic	k as app	propriate				
5. If you <i>Please r</i> Positive	ead the		an is <u>unsound,</u> or explanations o	s it be of the 7	cause it is not: Tests of Soundness	
Justified						
Effective		1				
Consist	ent with	National Policy	/? 🗹			
or fails to	rish to s	oly with the duty	to cooperate.	Please	e be as precise as	y compliant or is unsound possible. Plan, please also use this
1	I a	m in a	greement	wi	th Bold -	L Clock face
	achô	n group				

7. Please set out what modification(s) you consider compliant or sound, having regard to the matter you relates to soundness (NB please note that any notincapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text.	ou have identified at 6. above where this n-compliance with the duty to cooperate is I need to say why this modification will make e helpful if you are able to put forward your
Please note your representation should cover such	Please continue on a separate sheet if necessary
supporting information necessary to support / justi modification, as there will not normally be a subse representations based on the original representation After this stage, further submissions will be on on matters and issues he/she identifies for exa	quent opportunity to make further on at the publication stage. If y at the request of the Inspector, based
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 p	
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 e this to be necessary:	xamination, please outline why you consider
Please note the Inspector will determine the most	annropriate 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 comple Please keep a copy for	ete and return this response form.

RO0738



44, Crantock Grove, Windle, ST.HELENS, Merseyside. WA10 6EJ

0 7 MAR 2019

FAO Government Planning Inspector,

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

Wednesday, 6th March, 2019

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

Dear Sir or Madam,

Given the industrial background of the development of the town of St. Helens in its 250 year history, and the consequent devastation of areas still in evidence today, the overarching ethos of this Local Plan has to be one of REMEDIATION. Even decades after heavy industry has left, there still remain landscapes ruined by industrial waste (see appendix); and yet, our local planners want to remove green spaces and valuable agricultural land, in effect, continuing the work of the 19th and early 20th century industrialists. And whilst it was interesting to see in a Council publication, 'Transforming Our Town' (October 2017), under the heading 'Residential Opportunities', a statement of intent referring to the future development of 'underused and vacant sites located around the town centre boundary', this would seem at odds with the real time situation, where the unnecessary removal of 'out of town' Green Belt is sought. Devising a Local Plan is a great opportunity to right the wrongs of the past but, sadly, the authors of this Local Plan have shown only half-hearted commitment to this; acres of 'brownfield' and previously developed land sites exist in the borough and are likely to continue to exist should Green Belt prove too much of a rival attraction.

In this light, I am writing to object to the St.Helens Local Plan (2018); I object to the decisions made regarding Housing need (LPA05) and the Green Belt Review (2018). I shall also attempt to address some of the criteria in which this Local Plan is to be examined.

The Local Plan is not justified; it is based on flawed methodology. Its housing targets proposed are based on aspirational employment growth predictions, i.e. ONS2014, when there are more accurate ONS2016 statistics available. The ONS2014 prediction for housing need is 486 houses/year while ONS2016 predicts a need for 393 houses, a 21% reduction. Also, the Brownfield Register of the Council suggests availability for 5808 houses. Use of the early statistics results in unnecessary high housing targets. Lowering the identified need to the truer figures contained in ONS2016 together with the Brownfield availability will reduce the need for building on Green Belt.

The 8HS site sits astride the Windle Brook and its associated flood plain which is within Flood Zone 3 of the Environmental Agencies mapping system; the name 'Watery Lane' is significant. This physical problem has been overlooked by the planners in the decision to select this site for development and it cannot be justified since building on a flood plain will have a serious affect on the natural drainage in the area.

The Local Plan is not effective; it is not deliverable on a number of issues:

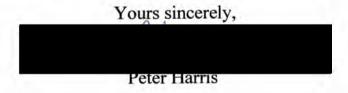
- It promotes unsustainable traffic growth as the development of site 8HS with 1000 houses, releasing 1800 cars on to the roads in an area already beset with traffic problems, would exacerbate traffic difficulties. The local estate roads are narrow and would not accommodate the extra traffic; pedestrian safety has not been considered and consequently is at risk The IDP (Infrastructure Development Plan) refers to current road improvements but does not indicate how road improvements are to be made or funded.
- With this increase in traffic there would be a negative impact on air quality, noise, tranquillity and general health as the Local Plan does not promote less vehicle dependency with its proposals for edge of town developments.
- Nor does the IDP explain the impact on Healthcare and Education; how this will be managed and funded is vague or not included. For example, the local Primary and Secondary schools are oversubscribed and there are no plans, nor sites, envisaged for new schools.
- The Local Plan is also not deliverable on 8HS for a very practical reason; United Utilities do not allow building over mains water supply. Running across the 8HS site is the West East Trunk Main, a 1.2m wide pipeline from Prescot to Bury built in 2010/11; easement restrictions prevent building on a 10metre swathe of land along the length of the pipeline.

The Local Plan is not consistent with National Policy; it does not satisfy:

- The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs in the 'out of town' proposed building sites. 8HS is not well served by public transport; the railway station is on the opposite side of town, 4 miles away, and current bus services do not connect Eccleston and Windle with major employment areas.
- Sustainable housing. The targets proposed are based on aspirational and unrealistic growth predictions; the population growth in the borough does not justify extra house building.
- Effective land use by concentrating on Green Space development as opposed to town centre development with high densities.
- Food security by ignoring Agriculture Land Quality. Loss of Grade 1 and 2 Agricultural land that comprises most allocated and safeguarded sites is not mentioned in the Local Plan, nor the negative impact on farm and distributive jobs.

(Selection of 8HS as 'Safeguarded for development', comprising, as it does, valuable agricultural land, and considering the largely unaddressed infrastructure problems created if it were to be developed, casts <u>serious doubt</u> as to whether this Local Plan has been <u>positively prepared</u>, and, I understand, there is already an agreement in existence between Story Homes, the Cumbrian developers and the current land owners, which would call into question the driver of this Green Belt release, namely, developers, land owners or local need?)

When these criteria are examined it is clear that there are no 'exceptional circumstances' to change Green Belt boundaries. The economic analysis is flawed and unrealistic and other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. There is no justification in the requirement for releasing Green Belt and, therefore, the Local Plan must be amended and modified.



Appendix

That factory has now gone some 30 years ago, and the area has lain largely derelict since (see annotated photograph and map); a small area of this land is used by a pallet distributor and an overflow car storage park for Chapel House Motors. While travelling on the train to Liverpool recently I noticed clearance taking place though I feel an opportunity has been lost here as it appears the development is industrial/warehousing in nature. With some imagination on the part of the town planners and inducement to the developers the area could have been rejuvenated with housing and landscaping, and all within walking distance of the town centre, thus reducing vehicle dependency. Housing development here would not be straightforward, but it's one example of derelict industrial land in the borough in need of remediation and reclassification, rather than the 'quick fix' of development in 'easy' Green Belt areas.

(The 'Shires' housing development on the old Pilkington Timber Yard off Canal Street was a difficult remediation project but it was achieved with energy and imagination.)



Aerial photograph taken in 1929! Industrial area now develot after 910 years

Area now used by
'Palletland' and
carstorage
- evidence that
remediation is
possible

99

-Remediation.
15 possible
15 possible
15hires housing
already boilt
on reclaimed
industrial
Land.

RO0739

44, Crantock Grove, Windle, ST.HELENS, Merseyside. WA10 6EJ

FAO Government Planning Inspector,

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

Monday, 11th March, 2019

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

Dear Sir or Madam,

I am writing to object to the St.Helens Local Plan (2018). I object to the decisions made regarding Housing Need (LRA05) & (LPA06) and the Green Belt Review (2018)

Why do areas of the Green Belt have to be sacrificed to fulfil the Council's disputed target of 486 houses per year when, according to the Brownfield Register of the Council, there is availability for 5808 houses; even a simple mathematical calculation shows that this Brownfield availability would allow nearly 12 years of house building at 483 houses per year and other previously developed sites will undoubtedly become available during those 12 years.

I am particularly concerned with the 8HS site designated as 'Safeguarded' by the Council. There are huge potential problems associated with housing development on this site as I shall outline here:

(i) Building on 8HS with 1000 houses would potentially release 1800 cars on to roads in the area already beset with problems. The local estate roads are narrow and would not accommodate extra traffic; pedestrian safety would be imperilled.

(ii) There would be a negative impact on air quality, general health, tranquillity and quality of life.

(iii) There would be a severe impact on Primary and Secondary school places which are already oversubscribed. Bleak Hill school is being enlarged simply to cope with the present demand not allowing for any demand in the future resulting from increased house building.

(iv) This is not a plan which promotes sustainable transport; building on 8HS would promote increased car dependency as this site is not well served by public transport and the railway station is 4 miles away on the other side of town; nor do the local bus services connect Eccleston and Windle with major employment areas.

(v) The population growth suggested by the Local Plan is aspirational and based on unrealistic growth predictions; this 'growth' does not warrant the building of so many houses.

(v) This Local Plan concentrates on Green Space development as opposed to town centre development with high densities. With the collapse of town centre shopping and the closure of large retail premises there is potential to develop town centre living as opposed to out of town sites.

(vi) The 8HS site has been used for many years for agriculture; it is quality arable farming land and has contributed over those years to food security which is slowly becoming endangered due to building development.

(vii) And, lastly there are two physical and practical problems:

a. Through the 8HA site runs the Windle Brook with its associated flood plain; building here would have a serious effect on natural drainage.

b. Running across the 8HA site is the West East Trunk Main, a water pipeline from Prescot to Bury; United Utilities do not allow building over the pipeline.

And, I must add, aside from all these local planning considerations, there is the human impact that any decisions will have; I have lived all my life in St.Helens, been educated here, paid rates and council taxes, worked hard to establish a good quality of life, supported our local councillors and felt proud to live in the town but these last two years have caused great personal stress, anxiety, concern and even ill health. This personal impact must be taken into account when any decisions about the removal of Green Belt are made.

I urge you to take ALL issues into consideration when coming to your decision.

Yours sincerely

Carol Harris (Mrs)

RO0740

Representor Details

Web Reference Number	WF0469
Type of Submission	Web submission
Full Name	Mr John Harris
Organisation	
Address	34 Crantock Grove, Windle WA10 6EJ
Agent Details	

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

Yes (via e-mail)

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

or to trinon part of the zood frances this to	, p
Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Development and greenbelt de classification of
	sites 8HS and 3HS

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

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

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

Positively prepared, Justified, Effective

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

The plan falls short of efficient use of existing and lesser contaminated brownfield sites before use of greenfield sites.

The plan also puts significant strain on local resources such as schools, dentists, doctors surgeries

Finally the exising road infrastructure is already significantly strained without considering the additional traffic that development could introduce.

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

You must consider de-contamination of brownfield sites for develoment before the permanent removal and destruction of greenbelt land.

You must consider building new schools especially primary schools alongside any development in the Eccleston/ Windle area as the existing primary schools are already struggling.

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

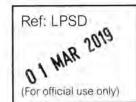
9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/20/2019 10:34:09 PM
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RO0741



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



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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company:
Address: LII VICARAGE DRIVE	Address:
Postcode: WAIL OUG	Postcode:
	Tel No:
Mobile	Mobile No:
Email:	Email:
Signature	Date: 25-2-19
	e 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 standard (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035 publication of the Inspector's recommendations and
Yes (via email)	□ No
	ethod of communication. If no email address is provided

RETURN DETAILS

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

post to: Local Plan

St.Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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

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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.

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No Oov'T KNOW 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.	Appraisal/ Strategic Environmental Assessment Assessm	3. To which	part of the Local Pla	an does this repre	sentation relate?	
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 Oor Kooo 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.	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 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	-PA-	diagram	V 67, 95C.2	Appraisal/ Strategic Environmental	Regulations
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or fails to comply with the duty to cooperate. Please be as precise as possible.	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	Consistent	with National Policy?			
		6. Please g	ive details of why yo o comply with the du	u consider the Lo	lease be as precise as p	ossible.

rela inca the	ase set out what modificant or sound, having retes to soundness (NB pleapable of modification at a Local Plan legally compligested revised wording o	egard to the matter ase note that any no examination). You w ant or sound. It will	you have identified on-compliance wit ill need to say wh be helpful if you a	d at 6. above when the duty to coo y this modification or able to put for	re this perate is on will make
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the	proposed remov	ead from th	e Greenb	elt.	
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fter th	is stage, further submissi ues he/she identifies for e	ons will be only at t	he request of the	Inspector, based	on matters
8. If yo	our representation is seek oral part of the examination	ing a modification; on? (the hearings in	do you consider it public)	necessary to pa	rticipate at
/	No, I do not wish to partic at the oral examination	cipate	Yes, I wish to pa examination	articipate at the ora	al
9. If yo	ou wish to participate at the to be necessary:	ne oral part of the ex	amination, please	outline why you	consider

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

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

Please keep a copy for future reference.



2)-Statement of Common Ground

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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: Qualan	
last Name: HARRISON	Last Name:
Organisation/company:	Organisation/company:
Address: W. VICARAGE DRIVE HAYDOCK	Address:
Postcode: WAIL OUG	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 · 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.

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

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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.

Policy	Paragraph/	Policies	Custoinghillity	Habitats
Policy LPA 04	Paragraph/ diagram table	Map	Sustainability Appraisal/ Strategic Environmental	Regulations Assessment
DEA,			Assessment	
	ments (please name and relevant part/secti	on)		
	consider the St Helen ad the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Con	mpliant?		Yes 🗆 No D	on't know
Sound?			Yes 📈 No	
Complies w	ith the Duty to Cooper	ate 🔲	Yes No	
Please tick	as appropriate	[1]		
Positively Pr	repared?	N N		
Effective?				
Consistent v	with National Policy?			
or fails to	o comply with the dut the to support the lega box to set out your co	y to cooperate. <u>Pl</u> al compliance or s omments.	cal Plan is not legally corease be as precise as pooundness of the Local Personal, unsamed for the tollowing in the tollowing in the course significant to early the risk of a further development traffic will according authorities.	essible. Plan, please also
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Delete this land from on the Greenbelt.	the	proposed	remaral
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se note: your representation should cover so	uccinctly esentatio	all the information, on and suggested m	, evidence and supporting nodification, as there
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	esentatio make fur only at th cation; d rings in	n and suggested mather representation representatio	nodification, as there as based on the original aspector, based on matte aspector based on matte

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.

RO0742



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

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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
First Name. JOHN	Last Name:
Last Name: TIARRISONO	Organisation/company:
Address: HI, VICARAGE DRIVE	Address:
	Postcode:
Marie Ma	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25 - 2 - 19
considered you MUST include your details above	
Would you like to be kept updated of future sometimes (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred now will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/200	nethod of communication. If no email address is provided 04/5/contents

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens

WA10 1HP

or by hand delivery to:

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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 Pla	an does this re	presen	ation relate?	
Policy PA OH OH EA EA	Paragraph/ diagram table	Policies Map	Y	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)			
	consider the St Helens ad the Guidance note				e Tests of Soundness
Legally Con	npliant?		Yes	□ No Do	N'T KNOW
Sound?		0.0	Yes	₽ No	
Complies w	rith the Duty to Cooper	ate	Yes	No	
Please tick a	as appropriate				
Please rea	nsider the Local Plan ad the Guidance note				
Positively Pr Justified?	epared?	4			
Effective?		, k			
	with National Policy?				
or fails to	ve details of why you comply with the dut th to support the lega box to set out your co	y to cooperate al compliance	. Please	be as precise as po	ssible.
		minimenta.			
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Please continue on a separate sheet if necessary

7. Please set out what modific compliant or sound, having relates to soundness (NB p incapable of modification a the Local Plan legally comp	regard to the matt lease note that any at examination). You	ter you have identity y non-compliance v u will need to say v	fied at 6. above with the duty to why this modific	where this cooperate is ation will make
Delete This land				
		Ple	ase continue on a sepa	arate sheet if necessar

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 yo	ur representation is seeking a modifica oral part of the examination? (the heari	tion; do you consider it necessary to participate at ngs in public)
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.



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

Ref: LPSD (For official use only)

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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:
Title: 17K	Title:
First Name: 10HD	First name:Last Name:
Last Name: YARRISON	Caraciantian/gampany
Organisation/company:	Organisation/company:
Address HI. VICARAGE DRIVE	Address:
HAY DOCK	
Postcode: WALL OUG	Postcode:
1 October 1 martin and Andrews	Tel No:
	Mobile No:
	Email:
Signature	Date: 25-2-19
considered you MUST include your details above	be accepted and that in order for your comments to be e.
Would you like to be kept updated of future so (namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-203 publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred m we will contact you by your postal address.	nethod of communication. If no email address is provid

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St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

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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.

Policy LPA- OS SINE 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
	consider the St Helen ad the Guidance note		Plan 2020-2035 is: f Legal Compliance and the	ne Tests of Soundness
Legally Cor	npliant?		Yes □ No ⊋	on'T KNOW
Sound?			Yes No	
Complies w	rith the Duty to Cooper	rate 🔲	Yes No	
Please tick	as appropriate			
	nsider the Local Plar ad the Guidance note		because it is not: the Tests of Soundness	
Positively Pr	repared?	Z		
Justified?		Z		
Effective?				
Consistent	with National Policy?	A		
	comply with the dut sh to support the lega	ty to cooperate. P	cal Plan is not legally co lease be as precise as p soundness of the Local I	ossible.

Greenbelt land touts to encourage recycling of develict or

other urban land; the release of Greenbelt will cause significant harm to the purposes of the Greenbelt; howing in this area

isn't sustainable because of the lack of school places, doctors' surgenes; access to the site is inadequate, is not safe and

the proposal to a junction at hiverpool Rd + Vicarage Rd would

additional traffic on an already overstretched highway

Please continue on a separate sheet if necessary

compliant or sound, having regard relates to soundness (NB please incapable of modification at example the Local Plan legally compliant of suggested revised wording of any	(s) you consider necessary to make the Local Plan legally of to the matter you have identified at 6. above where this note that any non-compliance with the duty to cooperate is nination). You will need to say why this modification will make or sound. It will be helpful if you are able to put forward your y policy or text. Please be as precise as possible.
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	Please continue on a separate sheet if necessar
	d cover succinctly all the information, evidence and supporting

8. If yo	our representation is seeking a modification or all part of the examination? (the hearing the control of the hearing the hearing the control of the hearing the he	ntion; do you consider it necessary to participate at ngs in public)
	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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

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

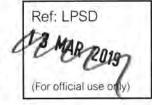
Please keep a copy for future reference.

RO0743

RO0744



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



Representation (i.e. Comment) Form

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

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Part A - Personal Details

Part B - Your Representation(s)

1 2 MAR 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)	Tille
	Title:
First Name: CAROC	First name:
Last Name: MARRISON	Last Name:
Organisation/company:	Organisation/company:
Address: 4 THE PAIRWAUS	Address:
INSTITUTE TO MALERYTECOD	
Postcode: WNY OYX	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 913/19
Signature: Please be aware that anonymous forms cannot be	Date: <u>QISIIQ</u> e accepted and that in order for your comments to be
considered you MUST include your details above.	
Nould you like to be kept updated of future standardly submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2039 oublication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address. view at http://www.legislation.gov.uk/ukpga/2004/	thod of communication. If no email address is provided 15/contents

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PART B - YOUR REPRESENTATION

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Policy LPA	Paragraph/	Policies	Sustainability	Habitats
SITES ZEA, SEA,	diagram table	Map	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
	ts (please name relevant part/secti	ion)		
			Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Complia	int?	d	Yes No	
Sound?			Yes No	
Complies with the	ne Duty to Coope	rate	Yes No	
Please tick as a	ppropriate			
Positively Prepa Justified? Effective?	red?		f the Tests of Soundness	
Consistent with	National Policy?	L		
or fails to co If you wish to use this box	mply with the du support the leg to set out your o	ity to cooperate. <u>F</u> gal compliance or comments.	ocal Plan is not legally co Please be as precise as p soundness of the Local	ossible. Plan, please also
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AND OI	HER UR	LIBAN LA	NO. USING	UKEENBEL
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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.	
DELETE THIS LAND FROM THE PROPOSED REMOUAL 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 ye	our representation is seeking a modifica oral part of the examination? (the hearing	tion; do you consider it necessary to participate at ngs in public)
1	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 conside 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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RO0745



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;

Yes (via email)

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:
	Last Name:
	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
Signature:	Date:
Please be aware that anonymous forms can considered you MUST include your details al	not be accepted and that in order for your comments to be bove.
Would you like to be kept updated of futur (namely submission of the Plan for examinati adoption of the Plan)	re stages of the St Helens Borough Local Plan 2020-2035? ion, publication of the Inspector's recommendations and

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.

7 No

RETURN DETAILS

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St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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3. To w	hich pa	rt of the Local Pla	an does this	represent	ation relate?			
Policy Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	V	
		nts (please name relevant part/secti	ion)					
4. Do y	you con ase read	sider the St Helen the Guidance note	ns Borough L e for explanati	ocal Plan ons of Leç	2020-2035 is: gal Compliance a	nd the Te	ests of Soundne	ess
Legall	y Compl	iant?		☐ Yes	X No	i i		
Sound	1?			Yes	X No			
Comp	lies with	the Duty to Coope	erate	☐ Yes	⊠ No)		
Please	e tick as	appropriate						
Plea	ase read	ider the Local Pla the Guidance note				ess		
	ely Prep	pared?						
Justifi				X				
Effect		h National Policy?		X				
Consi	Sterit wit	n National Folicy?		X				
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Please	note: your represent	ation should cover	succinctly all the i	nformation, evider	n a separate sheet i nce and suppo ation, as there	
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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[[[[[[[[[[[[[[[[[[[Title:
Fig. 1112	Title:
First Name: CAYNOD	First name:
	Organisation/company:
	Address:
HAYDOCK ST MELENS	
1/2/	
	Postcode:
Mobile No:	Tel No:
Email:	Email:
Signature:	Date: 4-3-19
Please be aware that anonymous forms cannot be considered you MUST include your details above	e accepted and that in order for your comments to be
Would you like to be kept updated of future sta (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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3. To which	part of the Local Pla	an does this repre	esentation relate?	
Policy IP AOS SITE ZHA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/secti	on)		
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Legally Con	npliant?		Yes No D	on't know
Sound?			Yes No	
Complies w	ith the Duty to Coope	rate	Yes 🛮 No	
Please tick a	as appropriate			
Positively Pr Justified? Effective? Consistent v	repared? with National Policy?			
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			Please co	ontinue on a separate sheet if nece
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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: REBECCA	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 11 Woolston R) HAYDOCK, ST HELENS	Address:
Postcode: WAII OFQ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
	Email:
Signature:	Date: 4.3-19
Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future sometimes (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	No No
Please note - email is the Council's preferred r we will contact you by your postal address.	method of communication. If no email address is provided,

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Policy		an does this repre	sentation relate?	
LPA 05 31TE 24A	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Cor	mpliant?		Yes No P	ON'T KNOW
Sound?	200		Yes 🛮 No	
Complies w	vith the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
Positively P Justified? Effective?	repared? with National Policy?			
Consistent				
6. Please g or fails t If you wi use this	o comply with the dust sh to support the leg box to set out your consequences.	ty to cooperate. Pal compliance or somments.	cal Plan is not legally cor lease be as precise as pos soundness of the Local P	e full up.
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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: ANTHONY	First name:
Last Name: Harris on	Last Name:
Organisation/company:	Organisation/company:
	Address:
HAYDOCK ST HELENS	
	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile Ne:
Email:	Email:
Signature	Date: 4,3.19
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Would you like to be kept updated of future (namely submission of the Plan for examina adoption of the Plan)	tion, publication of the Inspector's recommendations and
Yes (vìa email)	No
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CPA 05 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	ion)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	e Tests of Soundness
Legally Cor	mpliant?		Yes No De	ont know
Sound?			Yes 🛛 No	
Complies w	vith the Duty to Coope	rate	Yes 🛛 No	
Please tick	as appropriate			
Positively P Justified?	repared?			
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Effective?				
	with National Policy?			
Consistent				
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Del Ren	Lete This Land moud from the	from the proposed greenbelt
		Please continue on a separate sheet if necessary
nformativill not a prese of the control of the cont	tion necessary to support/justify the representation at the publication stage. is stage, further submissions will be used he/she identifies for examination.	cation; do you consider it necessary to participate at
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
	ou wish to participate at the oral part of to be necessary:	of the examination, please outline why you consider
lease	note the Inspector will determine the mo	ost appropriate procedure to adopt to hear those who have

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Please keep a copy for future reference.



3-LPAOS Q-Statement of Common Ground

3-LPAOS Q-Statement of Common Ground

Ref: LPSD

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	Your Agent's Details (if applicable) (we will correspond via your agent)	
Title: MRS	Title:	
First Name: ALICE CHRISTINE	First name:	
Last Name: HARRISON	Last Name:	
Organisation/company: RE-	Organisation/company:	
Address: 549 GARSWOOD RD ASHTON IN MAKERFIELD	Address:	
Postcode: WNH OXH	Postcode:	
	Tel No:	
	Mobile No:	
	Email:	
Signature:	Date: 10.03.19	

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.

Plan 2020-2035? (namely submis Inspector's recommendations and	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the data adoption of the Plan)
Yes (Via Email)	No 🗌

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

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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.

LPADS / diagram / table	Map	Sustainal Appraisal Strategic Environm	/	Habitats Regulation Assessment	
	5 PAN - 7	Assessm			
ther documents (please name ocument and relevant art/section)					
Do bu or ser the Same	(Percurabiliana		754-		
ease residence notesio.					
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ound?	Yes 🗆			No K	
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ositively Prepared? ustified? ffective?	T	ocal Plan is no	of representation of the con-	ant or is a	

causing an obstruction to all road users, this is due to local people living on the estate, 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.

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

Please continue on a separate sheet if necessary

×.

7. Please servout which consider necessary to make the compliant or sound the service
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 piots 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.

Policy UP A O	Paragraph / diagram / table	Policies Map	1115	Sustainability	Habitats Regulation Assessment	
Other docume document and part/section)	ents (please nam d relevant	ne				
4. Do you con	sider the St Hele e Guidance note i	ens Borough L for explanations	ocal Pla of Lega	an 2020-2035 is: I Compliance and the	Tests of Soundness	
		Yes 🖹		No L	No C	
		Yes 🗆	res 🗆		No 🗠	
Complies with the Duty to		- N	res □		No ≤	
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Cooperate Please tick as a 5. If you cons Please read th Positively Pre Justified? Effective?	ppropriate sider the Local P e Guidance note	an is unsound for explanations	is it be	ecause it is not		

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

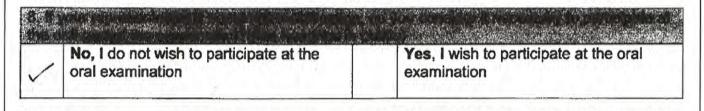
7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having figured to the matter you have identified at 6, above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification 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.

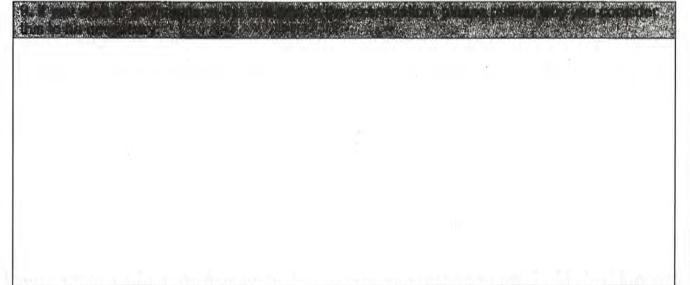
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Please continue on a separate sheet if necessary

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.





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

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

Please keep a copy for future reference.



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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1 3 MAY 2018

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: NATHAN	First name:
ast Name: HARRISON	Last Name:
Organisation/company:	Organisation/company:
Address: 20 AZALEA GONS	Address:
ST. HELENS	
Postcode: WA9 UFW	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 27/1/19
Signature.	
lease be aware that anonymous formormous to be considered you MUST	
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lease be aware that anonymous formoments to be considered you MUST Would you like to be kept updated Plan 2020-2035? (namely submission inspector's recommendations and actions and actions and actions are commendations.)	of future stages of the St Helens Borough Local on of the Plan for examination, publication of the



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1 3 MAY 2019

2. Your Agent's Details (if applicable)

(we will correspond via your agent)

PART A - YOUR DETAILS

1. Your Details

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

itle: MRS	Title:
irst Name: (ILLIAN)	First name:
ast Name: HARRISON	Last Name:
Organisation/company:	Organisation/company:
Address: 20 AZMEA GONS ST. HELENS	Address:
Postcode: WA9 4FW	Postcode:
-osicode. Van Andrea	Tel No:
	Mobile No:
	Email:
Signature:	
lease he surged that anonymous forms car	nnot be accepted and that in order for your
lease be aware that anonymous forms car omments to be considered you MUST incli	······································
lease be aware that anonymous forms car omments to be considered you MUST inclu Would you like to be kept updated of full plan 2020-20352 (namely submission of	uture stages of the St Helens Borough Local the Plan for examination, publication of the
lease be aware that anonymous forms car omments to be considered you MUST inclu	uture stages of the St Helens Borough Local the Plan for examination, publication of the



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This form has two parts;

Part A - Personal Details

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PART A - YOUR DETAILS

Yes (Via Email)

m. 1 3 MAY 2019

Please note that you must complete Parts A and B of this form. 2. Your Agent's Details (if applicable) 1. Your Details (we will correspond via your agent) Title: MR Title: First name: First Name: ANTHONY Last Name: Last Name: HARRISON Organisation/company: Organisation/company: Address: 20 AZALEA GARDENS Address: NEWbold, ST. HELENS Postcode: WA9 4FW Postcode: Tel No: Mobile No: Email: Date: Signature: Please be aware that anonymous forms cannot be accepted and that in order for your

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the

Please note - e-mail is the Council's preferred method of communication. If no e-mail

comments to be considered you MUST include your details above.

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

Inspector's recommendations and adoption of the Plan)



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PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MCS	Title:
First Name:	First name:
Last Name: Harrison	Last Name:
Organisation/company:	Organisation/company:
Address: Tonseals Postcode: wag 400	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	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 Plan 2020-2035? (namely submission Inspector's recommendations and ad	on of the Plan for examination, publication of the Plan)
Yes (Via Email)	No 🗆
Please note - e-mail is the Council's address is provided, we will contact	preferred method of communication. If no e-mail you by your postal address.

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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Telephone:

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

PART B - YOUR REPRESENTATION

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

Policy	/ diagram / table	3. To which	n part of the Local F	Plan does this repr	esentation relate?	
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 Complies with the Duty to Yes No Cooperate 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	document and relevant part/section		/ diagram / table	Мар	Appraisal/ Strategic Environmental	Regulation
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes □ No□ Complies with the Duty to Yes □ No□ Cooperate 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	Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No Complies with the Duty to Cooperate 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? Listified? 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	document a	and relevant	ne		
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	Please continue on a senarate sheet if necessary	DOX TO SET	out your comments			
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	Please continue on a separate sheet if necessary					
					Please continue on a	a separate sheet if necessary

7. Please set out what modification(s) compliant or sound, having regard to trelates to soundness (NB please note incapable of modification at examination the Local Plan legally compliant or source suggested revised wording of any police.	he matter you ha that any non-cor on). You will nee and. It will be hel	ave identified at 6. above where mpliance with the duty to coope to to say why this modification with the put forward and to put forward.	this erate is will make
Please note your representation shows supporting information necessary to se			and
modification, as there will not normally representations based on the original After this stage, further submission on matters and issues he/she identity. 8. If your representation is seeking a retail the oral part of the examination? (the left)	be a subsequer representation a s will be only a ifies for examin nodification; do y	nt opportunity to make further the publication stage. It the request of the Inspector ation. You consider it necessary to particular the publication.	r, based
No, I do not wish to participate a oral examination		Yes, I wish to participate at the examination	ne oral
9. If you wish to participate at the oral this to be necessary:	part of the exam	nination, please outline why you	consider
Please note the Inspector will determ who have indicated that they wish to p			hear those
Thank you for taking the ti		and return this response form.	



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.

	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Γitle:
First Name: Natalie Harrison F	First name:
Last Name: Harrison	_ast Name:
Organisation/company: Tunstalls form	Organisation/company:
	Address:
Postcode: WA9 4QJ F	Postcode:
Tel No:	Гel No:
Mobile	Mobile No:
Email:	Email:
Signature: Da	te:

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

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

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

PART B - YOUR REPRESENTATION

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

3. To wh	nich part of the Local	Plan	does this re	prese	ntation relate?		
Policy	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmenta Assessment	ı	Habitats Regulation Assessment
	ocuments (please na nt and relevant tion)	me					
	ou consider the St He						s of Soundness
	Compliant?	Ye				o□	
Sound?		Ye	es 🗆		N	ο□	
	s with the Duty to		es 🗆			ο□	
Coopera					1		
	k as appropriate						
5. If you	consider the Local F	Plan is	unsound, is	s it be	cause it is not:		
	ead the Guidance note					ss	
Positive	ly Prepared?]	3				
Justified	?	Ī	7				
Effective	?	ī					
Consiste	ent with National Poli	cv?	1				
		-) - 1					
6. Pleas	e give details of why	VOU C	onsider the	Local	Plan is not leg	ally com	oliant or is unsound
	o comply with the du						
or rano t	o compry with the du	ty to o	operate.	icasc	DO GO PICCIOC C	AO POOOIL	710.
	sh to <u>support</u> the leg		pliance or	sound	ness of the Loc	al Plan,	please also use this
DOX 10 3	ot out your comment	3					
					Please continu	e on a sep	parate sheet if necessary

7. Please set out what modification(s) y compliant or sound, having regard to the relates to soundness (NB please note the incapable of modification at examination the Local Plan legally compliant or sour suggested revised wording of any policy	e matter you ha nat any non-cor n). You will nee nd. It will be help	ave identified at 6. above where this impliance with the duty to cooperate is d to say why this modification will make oful if you are able to put forward your
Please note your representation should supporting information necessary to supmodification, as there will not normally be representations based on the original representations stage, further submissions on matters and issues he/she identification.	oport / justify the be a subsequer epresentation as will be only a ies for examin	e representation and suggested at opportunity to make further the publication stage. It the request of the Inspector, based ation.
8. If your representation is seeking a month the oral part of the examination? (the head oral examination) No, I do not wish to participate at oral examination	earings in public	you consider it necessary to participate at c) Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral p this to be necessary:	art of the exam	ination, please outline why you consider
who have indicated that they wish to pa Thank you for taking the tim	rticipate at the	and return this response form.

Representor Details

Web Reference Number	WF0354
Type of Submission	Web submission
Full Name	Mrs Hannah Harrison
Organisation	
Address	3 Lakeside Court
	Rainford WA11 8LE
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	HA8
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

No justifiable reason to use prime farming land for building.

Risk of flooding to adjacent areas.

Loss of employment.

No justification for using green belt for building.

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

This land should not be considered for building.

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 12:18:06 PM

Representor Details

Web Reference Number	WF0389
Type of Submission	Web submission
Full Name	Mr Stephen Harrison
Organisation	to the substitute of the first of the substitute
Address	177 Liverpool Road Haydock St Helens WA119RX
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	TO THURSDAY SERVICE TO THE SERVICE T
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not Justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt daily to encourage this.

The release Greenbelt will cause significant harm to the purposes of the Greenbelt. Increased housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. Further to this, more people means more cars, means more vehicles on the road leading to the roads themselves. The current state of the local roads are inadequate with pot holes and uneven surfaces, which in turn is causing damage and unnecessary wear and tear to vehicles. So how would the infrastructure be able to cope with the added influx of people.

The access to the site is inadequate, a left in / left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways systems. There would be problems of rat-running though the proposed development.

Although a little mercenary, the proposed development of housing would greatly affect the house pricing for residents on Liverpool Road, Vicarage Drive, Brookside View and surrounding areas that

back onto the proposed. Is this really fair on these residents who have been loyal and resided in —	
their homes for many years, some all their lives and stayed with the Haydock community fro their housing to be de-valued greatly?	(1)
There are existing flooding problems at the site and remedies to prevents this would place even greater amounts of water into the Clipsley Brook.	
There is no statement of common ground with neighbouring authorities.	$\square(2)$
7. Please set out modification(s) you consider are necessary	
Delete this land from the proposed removal from the Greenbelt	
8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?	
No, I do not wish to participate at the oral examination	

Response Date 3/2/2019 7:45:55 PM

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

(1)-LPAO4 (2)-Stabernent of Common Ground

Representor Details

Web Reference Number	WF0390
Type of Submission	Web submission
Full Name	Mr Stephen Harrison
Organisation	The strate of th
Address	177, Liverpool Road Haydock, St Helens Wa119RX
Agent Details	P (1905. A)

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt in respect of site 2EA -Florida Farm North.

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

High volumes if predicted traffic will add to the already over capacity on the highways in the vicinity. Further to this, the more HGVs the more 'wear and tear' on the roads, thus more and more pot holes and uneven surfaces. This will intern affect personal vehicles suspension and tyre use.

The warehouses that are being built at the moment originally stated that they would be single storey in height. This is the case, however, these warehouse are still visible for residents on Liverpool Road whom back onto the Florida Farm land.

How would YOU honestly feel if this was YOU?

There is no statement of common ground with neighbouring authorities.

6

They say that this new infrastructure will bring X amount of new jobs... Very good, but for WHO? The residents of Haydock? NO infact this would draw more people into the area, stretching the already crippled infrastructure. Thus the new development will not help with jobs for the people of Haydock. Furthermore, if the machinery in the warehouses is going to be automated, where does this help the work force?

Haydock was once a quant and peaceful village. Yes, it had to go with the times and have some industrialisation, but where does this stop? The Greenbelt is there for the residents of Haydock to enjoy. Why ruin it?

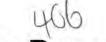
- 7. Please set out modification(s) you consider are necessary
 Delete this land from the proposal removal from the Greenbelt
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	3/2/2019 7:27:31 PM
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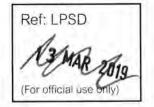




1 2 MAR 2019



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



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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: ANTHONY	First name:
Last Name: HAQQISON	Last Name:
Organisation/company:	Organisation/company:
Address: 4 THE FAIRWAUS	Address:
	Postcode:
	No:
	bile No:
	ail:
	Date: 9/3/2019
Signature:	Date. 1 2 1 2 1 1
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred metho	od 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

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	LPA	Paragraph/	Policies	Sustainability	Habitats
Choy	04- 51TES 2EA, 5EA	diagram table	Мар	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
	documen	ts (please name relevant part/secti	on)		
				Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legall	y Complia	ant?		Yes No	
Sound				Yes Wo	
Comp	lies with th	ne Duty to Cooper	rate	Yes Mo	
Please	e tick as a	ppropriate			
Positiv Justific		red?			
		National Policy?		/	
or f	ails to co ou wish to	mply with the du	ty to cooperate. <u>F</u> al compliance or	ocal Plan is not legally co Please be as precise as pe soundness of the Local I	ossible.
TH6	REL	CASE OF	GREENB	SECT WILL CAN	USE SE OF THE
H10	an u	OLUMES		DICTED TRAF CAPACITY OF	
THE	E CO 2 MIS	UNCIL F	HAS ALRE	EADY GRANT LEEN BEUT IN JA FARM NO	J RESPECT

7. Please set out what modification(s) you consider recompliant or sound, having regard to the matter you relates to soundness (NB please note that any nor incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text.	ou have identified at 6. above where this a-compliance with the duty to cooperate is a need to say why this modification will make be helpful if you are able to put forward your
RELETE THIS LAND FROM REMOUAL FROM THE G	REENBEUT.

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

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

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

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

Please keep a copy for future reference.

Representor Details

Web Reference Number	WF0084
Type of Submission	Web submission
Full Name	Mr John Harrison
Organisation	
Address	Orrits Nook Cottage,
	Higher Lane,
	Rainford
	St Helens
	Merseyside WA11 8NQ
Agent Details	

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

Yes (via e-mail)

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

Policy	All	
Paragraph / diagram / table	All	
Policies Map	All a particularly 8H Rainford	
Sustainability Appraisal / Strategic	All	
Environmental Assessment		
Habitats Regulation Assessment	All	
Other documents		

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

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

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

Justified, Effective, Consistent with national policy

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

As a resident within 200feet I have not been formally informed of any part of this plan. I am strongly against the release of ANY grade 1 agricultural land from the green belt - this is the best soil in the region/country/world - it is needed for the growing of thus nation's food/economy. If this land is removed from GB and developed upon it will have long term implications on wildlife/flooding/resources/travel/health.

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

NO grade 1 arable land to be removed from GB Brownfield/or at least Lesser grade land to be used -Formal notification of any part of the plan is required for residence at this address

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 12:33:09 PM
---------------	-----------------------





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	2. Your Agent's Details (if applicable (we will correspond via your agent)		
Title: MS	Title:		
First Name: FAANCES	First name:		
Last Name: HALKOP	Last Name:		
Organisation/company:	Organisation/company:		
Address: FLIMI COTTAGE, HOUGHTSAS, LANG, GECCESTON ST. HELGIS Postcode: WAIO 5 OG	Address:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature:	Date: 12/3/19		

Plan 2020-2035? (namely submission of the	" (C. C. C
Inspector's recommendations and adoption Yes (Via Email)	No

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

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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

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

3. To which part of the Local P	lan does this repr	esentation relate?		
Policy Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please nam document and relevant part/section)	ie			
4. Do you consider the St Hele	ens Borough Loca	l Plan 2020-2035 is:	Tasts of Soundness	
4. Do you consider the Striet Please read the Guidance note f	or explanations of L	egal Compliance and the No	Pests of Soundress	
Legally Compliant?	Yes L	No 🗗	,	
Sound?	Yes C	No 🗗		
Complies with the Duty to Cooperate	Yes C	NO E		
5. If you consider the Local Pl Please read the Guidance note:	an is <u>unsound,</u> is for explanations of i	it because it is not: the Tests of Soundness		
The state of the s	F			
Positively Prepared?	-			
Positively Prepared? Justified?	e e			
Positively Prepared? Justified? Effective?				
Positively Prepared? Justified?				
Positively Prepared? Justified? Effective?	you consider the ly to cooperate. Pl	ease be as precise as proundness of the Local F	ossible.	

	Please continue on a separate sheet if necess
elates to sound, naving regard to the matte elates to soundness (NB please note that any neapable of modification at examination). You	non-compliance with the duty to cooperate is will need to say why this modification will make the beloful if you are able to put forward your
Please see attached representation	-1
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lease note your representation should sover	Please continue on a separate sheet if necessar
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upporting information necessary to support / ju	succinctly all the information, evidence and ustify the representation and suggested
upporting information necessary to support / ju nodification, as there will not normally be a sub	succinctly all the information, evidence and ustify the representation and suggested assequent opportunity to make further
upporting information necessary to support / ju nodification, as there will not normally be a sub apresentations based on the original represent	succinctly all the information, evidence and ustify the representation and suggested osequent opportunity to make further tation at the publication stage
upporting information necessary to support / jundification, as there will not normally be a subsepresentations based on the original representations that the submissions will be	succinctly all the information, evidence and ustify the representation and suggested assequent opportunity to make further tation at the publication stage. only at the request of the Inspector, based
upporting information necessary to support / ju nodification, as there will not normally be a sub epresentations based on the original represent fter this stage, further submissions will be	succinctly all the information, evidence and ustify the representation and suggested assequent opportunity to make further tation at the publication stage. only at the request of the Inspector, based
upporting information necessary to support / ju nodification, as there will not normally be a sub epresentations based on the original represent fter this stage, further submissions will be in matters and issues he/she identifies for e	succinctly all the information, evidence and ustify the representation and suggested assequent opportunity to make further tation at the publication stage. only at the request of the Inspector, based examination.
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Frances Harrop Friars Cottage Houghtons Lane Eccleston

WA105QE

Tel:

Email:

Date: 12th March 2019

Dear Sirs,

Re: St Helens Borough Local Plan Submission Draft 2019

I would be obliged if you would accept this letter as my response to the above proposed Local Plan.

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

I believe that the Local Plan fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF) and I also believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. I do not believe that the Local Plan is positively prepared, justified, effective or consistent with National Planning Policy. It is based on out of date forecasts and is extremely aspirational.

In particular I wish to object to the proposed release of Green Belt land under the Local Plan and with particular with reference to the proposed site in Eccleston/Windle referred to as 8HS.

I am not opposed to development in the correct way as I firmly believe that St Helens urgently needs regeneration and development. However, I do not agree that this development should be partly by way of building over 2,172 new houses on Green Belt land.

I also do not agree that there is a need for land to be released from Green Belt land and safeguarded for development in the future.



Need for Houses.

I have read through the Local Plan and I cannot see anything that justifies the Council's ambitious belief that there is a need for new homes to be built of at the rate of 486 houses per year. In doing so the Council are using an older ONS forecast (2014) when they could instead use the more conservative latest estimate produce by the ONS (2016) which predicts a need for 383 houses per year. If the Council adopted the latest figure there would then be no need to build on Green Belt land.

I appreciate that the Council wish to create new jobs and more employment in St Helens. However, the sort of jobs that would be created under the Local Plan would be low paying jobs and those people fortunate enough to obtain the employment would need to live where there are adequate public services and public transport in place. I therefore believe it would make sense for those homes to be close to the Town Centre rather than in Green Belt areas on the rural edge of the Borough.

I understand that there are a large number of properties empty in St Helens and undeveloped sites close to the Town Centre which are close to existing transport links. I would therefore ask the Council to reconsider their Local Plan and rather than develop Green Belt land which is out of town, create a strategy to reduce the number of empty properties and to develop the Brownfield sites in and close to the Town Centre.

Green Belt.



The idea of Green Belt was to help define local boundaries and to prevent towns and villages merging and becoming one urban sprawl. What is being proposed by the council will see smaller villages grow and potentially eventually merge with other towns.

Green Belt land is important not just to people who live close to it but to all of the residents of St Helens. It separates St Helens from other local towns and helps give St Helens its character and attraction. People in St Helens can use the Green Belt with friends and family; there are numerous footpaths where they can improve their health by exercising with regular walks and by breathing clean unpolluted air.

The reasons not to release Green Belt land generally are numerous and I would ask the Council to bear in mind the following bullet points:

- 1. Reducing the amount of easily accessible Green Belt land will contribute to obesity and health problems.
- 2. Loss of important wildlife and wildlife habitats some of which are protected.
- 3. Release of Green Belt land will discourage the reuse of Brownfield sites and existing vacant buildings.
- 4. Reducing Green Belt land will increase noise and air pollution with the associated health risks.
- 5. Increase in local flood risk due to development of Green Belt land. Green Belt land acts as a large sponge for surface water and therefore for helps prevent flooding of nearby homes and houses.
- Loss of important trees and hedges.
- 7. With increasing global pressures from climate change, farmland and woodlands on Green Belt land will become even more valuable in the future.
- 8. Where the Green Belt land is in agricultural use, as is the case in relation to the proposed Safeguarded site known as 8HS, then this is a vital economic resource for food security and soil protection. Under the Local Plan vast amounts of farmland and the produce it provides will be lost forever if 8HS is released from Green Belt for subsequent development. With the changes that Brexit may bring about it is likely that it will be more important than ever to produce our own local produce.

Once parts of Green Belt are released its benefits are lost forever. It should be made clear in the Local Plan that Green Belt land will not be developed on and any development will take place on unused Brown field sites. If developers are permitted to develop on Green Belt land which forms part of the countryside there is no incentive to them to develop Brownfield sites which will just remain unused and be a blot on St Helens.

Brownfield Sites.

I understand that there are many brownfield sites across St Helens that could be used for housing and employment development before Green Belt sites are released. I believe the Council should develop a strategy so that those sites can be utilised before Green Belt sites. Those sites which are contaminated should have a plan in place to make the land uncontaminated. The developers who wish to build houses in St Helens should only be given the option of Brownfield sites with the cost of cleaning up the sites being borne by the developers.

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

Releasing Green Belt land should be a last resort because when it is released it is lost forever. Developers should not be given the option of building houses on Green Belt land when there are Brownfield sites that could be cleaned up and developed. Cleaning up contaminated land in St Helens in this way would benefit all the residents of St Helens. If developers are allowed to build houses on Green Belt land and make greater profits then there is no incentive for them whatsoever to clean up and develop Brownfield sites.

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

As I have already stated I do not believe that there is a need in the future for an additional 486 new homes per year in St Helens. Further if there is a need for some new homes I believe they should be developed in and close to St Helens Town Centre by developing unused Brownfield sites and vacant buildings. I believe this would help regenerate St Helens Town centre.

I therefore believe that the land known as **8HS** should **not** be released from Green Belt and should **not** be developed on and the Council should reconsider their Local Plan in relation to that land for the following reasons:

- Housing in Eccleston. Eccleston has already provided its fair share of housing in recent years, with the most recent example being the 262-home development on the former Triplex site. The developers of that site have still not been able to sell all of the new houses and a number remain unsold and unoccupied.
- Road Infrastructure. The above new development in Eccleston has already put local
 infrastructure under great strain. The roads in and around the Eccleston area are already
 congested and are inadequate to support existing traffic levels never mind increased traffic
 levels. 1,027 new homes on this site alone could increase the number of vehicles in the
 locality by approximately 1,900.
- 3. Traffic Congestion. Story Homes, developers who wish to develop this site, suggest access to this new development would be from a new junction where Houghtons Lane meets the A580. If a new junction was created then there would be approximately 1,900 cars exiting on to the A580 on a stretch of road which already backed up at peak times. Further if any of the new residents wished to travel into St Helens (which I am sure the Council would hope would happen) then they would have to travel east on the A580 and attempt to turn right at Windle Island. It is widely known and accepted that Windle Island at present cannot manage



the current volume of traffic. The A580 is already having to cope with increased commercial vehicles due to the numerous warehouses being built along the A580 and also the Super Port at Liverpool Docks.

- 4. Noise and Air Pollution. The substantial increase in traffic will increase the Noise and Air Pollution. I understand that it is now accepted that there is a link between pollution and diseases such as dementia and asthma. With the roads around Eccleston being ill-equipped to cope with a sharp increase in vehicles on the road, passing the Local Plan and releasing this vast amount of Green Belt in Eccleston would put the health of Eccleston residents at risk.
- 5. Inadequate services including Nursery provision, preschools, schools, doctors and dentists. Local schools/preschools, doctors, dentists and other key services in Eccleston are already massively oversubscribed. The local plan does not adequately address these problems and the current services would not be able to support the proposed growth. For the last 10 years, Eccleston Health Centre has been operating from a Porta Cabin based in a church car park. The building of so many new homes would make the situation a lot worse and put the health of residents at risk. Schools in Eccleston are already short of spaces. To introduce so many new family homes would result in the schools unable to meet the demand for places and young children having to travel to different areas to attend school. Having to travel to schools further away would also add to the traffic congestion.
- 6. Flooding. A lot of Eccleston is on a flood plain with roads and properties over the years having been affected by flooding. Green Belt land acts as a "sponge" for the surface water and helps to reduce the amount of surface water in the area. If this site is developed then there is a great likelihood that the new homes that will be built would be affected by flooding and surface water. A development of this size and the loss of the Green Belt land is also likely to cause flooding problems for the surrounding roads and houses with the land no longer being able to act as a "sponge" for those surrounding roads and properties.
- 7. Local Wildlife. This this particular Green Belt land is home to numerous species of birds, including corn bunting, long tail tits, Owls, birds of prey and more recently waxwings have been spotted. Other wildlife including bats and hares are often seen on this Green Belt land. There are also migrating birds including Canadian Geese that come to this Green Belt land. All of these will be disturbed and lost from the area should the land be released from Green Belt, to enable development to take place, taking away their natural habitat due to loss of important trees, hedges and other vegetation.
- 8. Footpaths. This particular Green Belt site has public footpaths that are regularly used by residents of St Helens. By just being out for a walk with family and friends, walking their dogs or ramblers on the footpaths and breathing in good clean air. To remove this easily accessible Green Space would contribute to obesity and other associated health problems.
- 9. Agricultural Land. This Green Belt land is Grade 1 & Grade 2 agricultural land and has been farmed for many years. It is a vital economic resource for produce and food. All of this would be lost to the present generation and future generations. This is particularly important as we do not know how Brexit will affect the food that we import. Also by having local produce available this can help reduce traffic and pollution problems associated with the transporting of produce. It also helps the regeneration of St Helens to encourage local shops and food outlets to support local farmers by purchasing their produce. This agricultural land also provides valuable employment to the farmers and the locals involved in the farming of the land and distribution of the crops. This employment would be lost if this Green Belt land was released.

Conclusion.

As I have stated I accept and support the Council in the need to regenerate and develop St Helens. I also appreciate that it is difficult for them but I would like to believe that when considering the Local Plan that the Council will listen to and take on board the views of the many residents in St Helens and in particular residents of the areas directly affected by the Local Plan.

I firmly believe for the reasons that I have stated that the Council should not release any Green Belt land but instead should develop Brownfield sites and vacant buildings closer to the Town Centre. It seems illogical not to develop unused Brownfield sites and vacant buildings in this way which would clearly benefit the people of St Helens far greater than St Helens losing prime Green Belt land which would then be lost forever.

I have already stated that I believe that Eccleston has already provided its fair share of housing in recent years. To release such a large area of Green Belt land at **8HS** in Eccleston and Windle will reduce the attractiveness of the area and change the character of the area. This would be a significant loss of Green Belt land which is not only enjoyed by Eccleston residents but also residents of St Helens generally.

If the development on the land at **8HS** was to proceed there would be substantial over development in the Eccleston area which the existing road infrastructure and services would be unable to support. The local schools, doctors, dentists and other key services are already oversubscribed and would be unable to meet the demand of all the new residents.

It is clear that financial contributions for education and off-site highway works are very likely to be required if 8HS was developed and there may be further requirements subject to detailed assessment of infrastructure needs. It is extremely worrying that the Council seems to have selected 8HS for such a large development without first fully identifying the needs and addressing fully how they will be met and funded. It is totally irresponsible to consider releasing Green Belt land to enable developers to develop on without first looking at the long term costs and detrimental effects to the locality and St Helens generally.

I would urge the Council to reconsider their Local Plan with a view to creating a Plan which would help regenerate the Town Centre and also protect the Green Belt and attractiveness of it for the residents of St Helens and their future generations.

Please can you acknowledge safe receipt and confirm that my comments will be considered.

Yours faithfully,

Frances Harrop



ST. HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT) -REPRESENTATIONS marJorie Hart

/STHMBC 10/03/2019 11:03

To Whom It May Concern,

my details:

MISS MARJORIE HART 123 HIGHER LANE **RAINFORD** ST. HELENS WA11 8BQ

I would like to be kept updated of future stages of the St. Helens Borough Local Plan 2020-2035 via email.

My Comments on 8HA Higher Lane/Rookery Lane, Rainford.

I am concerned about the additional traffic that 259 dwellings on this site would create. The pressure this will create on Doctors Surgeries, Dentists & Schools in the Village. This field is Grade 1 Agricultural Land & has been continually used over the years by our Farmers who live and work in Rainford. This land produces the crops for us to live from & our Farmers to make their living out of, even more so will this land be required for Farming with Brexit. Rainford is predominantly a Farming Community, making it different from the rest of the Borough. This site regularly floods. It is adjacent to Rainford Industrial Estate & so there are issues with Air Quality, Pollution & Noise, which happen on a regular basis.

There are also wildlife habitats.

The site is also in close proximity to two Listed Buildings.

kind regards marJorie Hart

Representor Details

Web Reference Number	WF0026
Type of Submission	Web submission
Full Name	Mr Mark Harvey
Organisation	
Address	143 Bleak Hill Road
	Windless
	St Helens
	WA10 6DW
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	HS8
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not satisfy the requirements for sustainable development, transport as the plan promotes increased car dependency, housing targets proposed are based on aspirational employment growth, there are better sites to develop including town centre rate as rather than using green belt land, and food security by ignoring Agricultural Land Quality.

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

Employment growth predictions are based on flawed historical data. Adequate regional and cross border collaboration has not been undertaken. The latest estimate produced by ONS (2016) predicts 383 house per year rather than the 486 quoted by St Helens Council (2014 data).

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned.

There is significant traffic implications at Windless Island, and the Infrastructure Delivery plan only refers to current levels of traffic. This will also impact on increased pollution levels.

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

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

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

Response Date	3/13/2019 4:59:15 PM

1 2 MAR 2019



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

Ref: LPSD

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MLS	Title
First Name: ELIZABETH	First name: Last Name:
Last Name: HATTON	Last Name:
organisation/company.	Organisation/company:
Address: 52 SMOCK LANG	E Address:
14,01/19	
Postcode: WN4 OSN	Postcode:
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Yes (via email)	□ No
lease note - email is the Council's pre e will contact you by your postal add view at http:/www.legislation.gov.uk/u	referred method of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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.

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 Sound Legally Compliant? Yes No Sound?			1 0	11-1-11-1
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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.

- Greenbelt land should only be released in exceptional circumstances. There are no exceptional circumstances in St Helens, which is a borough with a falling population. The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
- 2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively. The Local Plan will undo all the good work to date.
- 3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
- 4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
- 5. There would be a detrimental effect to local wildlife. Protected species are known to be nesting in the proposed site.
- 6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services. These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected. Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
- 7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
- 8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - Drainage in the area is very poor site 1HA regularly floods in wet weather. If this site is developed where will the water go - through the existing estates?

PART B - YOUR REPRESENTATION

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

Policy Paos Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helen Please read the Guidance note	e for explanations of	Plan 2020-2035 is: of Legal Compliance and the	ne Tests of Soundness
Legally Compliant?	\checkmark	Yes No	
Sound?		Yes No	
Complies with the Duty to Coope	rate	Yes No	
Please tick as appropriate			
Justified? Effective? Consistent with National Policy?			
6. Please give details of why your fails to comply with the details of why your fails to comply with the details of why your set out your fails box to set out your	uty to cooperate. gal compliance o	Please be as precise as p	ossible.
See separat	e sheet	attached	

		1 1 4
relates to sound, having regard relates to soundness (NB please n incapable of modification at exam the Local Plan legally compliant of	s) you consider necessary to make the Local Pland to the matter you have identified at 6. above whe note that any non-compliance with the duty to cool ination). You will need to say why this modification sound. It will be helpful if you are able to put forward policy or text. Please be as precise as possible.	re this perate is n will make
Delete this la removal from	and from the proposed the Green Belt.	
	Please continue on a separate sh	eet if necessary
nd issues ne/sne identifies for examin	modification; do you consider it necessary to part	
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination	6
9. If you wish to participate at the ora this to be necessary:	I part of the examination, please outline why you o	consider

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

LPA05 - SITE 1HS

- Greenbelt land should only be released in exceptional circumstances.
 There are no exceptional circumstances in St Helens, which is a borough with a falling population.
 The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
- Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
 The Local Plan will undo all the good work to date.
- The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
- Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
- There would be a detrimental effect to local wildlife.
 Protected species are known to be nesting in the proposed site.
- 6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
 These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
 Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
- 7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
- 8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor site 1HS regularly floods in wet weather. If this site is developed where will the water go through the existing estates?



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

Ref: LPSD 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Title: First name:
First name:
The Hamo.
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
ate: 19.4.19

Would you like to be kept update Plan 2020-2035? (namely submissing linespector's recommendations and	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the I adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Counci address is provided, we will conta	il's preferred method of communication. If no e-mail oct you by your postal address.



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

P

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: DAISY	First name:
Last Name: +IATTON	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Dougks Ave Bald St Welens	Address:
Postcode: WAG USZ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 19-4-19.
lease be aware that anonymous forms can comments to be considered you MUST inclu	not be accepted and that in order for your de your details above.

Would you like to be kept update Plan 2020-2035? (namely submissinspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council address is provided, we will contact	s preferred method of communication. If no e-mail tyou by your postal address.



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

3 0 APR 2019

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MLS	Title:
First Name: Name: Ann-Marie	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Daylas Ave Bold, St. Welens	Address:
Postcode: WAG (157	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	ail:
Signature:	Date: 19-4-19
ease be aware that anonymous forms omments to be considered you MUST in	cannot be accepted and that in order for your nclude your details above.
Would you like to be kept updated of Plan 2020-2035? (namely submission Inspector's recommendations and ado	of the Plan for examination, publication of the Plan
Yes (Via Email)	No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail

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



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

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3 0 APR 2019

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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

et 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: DC	Title:		
First Name: ANDREW	First name:		
ast Name: HATTON	Last Name:		
Organisation/company:	Organisation/company:		
Address: 7 Donce AS AVE BOLD, ST. HELE	Address:		
Postcode: WA9 452	Postcode:		
Γel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature:	Date: 19/4/9		

Would you like to be kept update Plan 2020-2035? (namely submissing Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🗹 (Via Email)	No 🗌
Please note - e-mail is the Council address is provided, we will contact	s preferred method of communication. If no e-mail t you by your postal address.

Representor Details

Web Reference Number	WF0203	
Type of Submission	Web submission	
Full Name	Mrs Rose Hatton	
Organisation		
Address	16 Heywood Gardens WA10 4JU	
Agent Details		

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

No

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

Policy	LPA05	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		100
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- No exceptional circumstances have been demonstrated to deviate from the Standard Method calculation
- The employment land requirements are based on aspirational growth rather than need
- The Plan then goes on to base housing needs on the flawed methodology used to calculate employment growth
- It's disappointing that despite many and numerous organisation disagreeing with the use of 2014 figures to calculate housing need, the Government has so far insisted on using them instead of more up to date figure from the ONS 2016
- Given the uncertainty of the figures, some allowance should be made to use a lower figure whilst that is being resolved and potentially allow a 10 year plan to be released instead of 15 years
- There is no evidence that all options have been explored to recycle some of the 3170 ha of the lowest priority contaminated land that exists in St Helens.
- Just a small percentage of that would be needed to avoid any Green Belt land being required
- Given no evidence that all options are explored, the Green Belt Review should not have been carried out
- The effort and expense of the GBR would have been better served remediating contaminated sites
- The LP mentions that much of the borough is Agricultural Land and as such this appears to have been discounted from decision making

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03

and food security to the greater North West region; particularly in this period of uncertainty during Brexit	0
 The growth projections and figures used are pre-Brexit and no account appears to have been made as to the impact this could have; even with a deal, the Governments own figures still point to negative growth 	0
 The borough already has significant and long term network issues, with congestion and pinch points on the increase 	
 The IDP discusses these problems and the planned fixes in place for these issues but does not address future problems; only that development won't be approved until they are The Plan does not promote sustainability with many sites promoting car dependency and isolation from public transport 	0
 This will increase air and noise pollution along with associated health issues, which surely cannot be in-line with NPPF 	
 The borough already struggles to provide GP appointments in a timely manner and additional GP's are already required for today's needs, especially in light of an aging population and current GP's reaching retirement age. 	05
- The IDP does not actually put a plan in place for how this will be resolved	

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

The plan has completely ignored the important role agricultural land has for jobs and food security. None of the best ALC should be used for development. The figures used are way out of date and over the top. No exceptional circumstances are shown for not using the standard method or for changing GB boundaries

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:

3/11/2019 9:14:20 PM	
	3/11/2019 9:14:20 PM





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

Ref: LPSD

2 4 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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable (we will correspond via your agent)
Title: MR	Title:
First Name: BILLY	First name:
Last Name: HRUGH	Last Name:
Organisation/company: N/A (RESIDENT)	Organisation/company:
Address: 12 FALKLAND OR GARSNOOD	Address:
Postcode: NN4 OSQ	Postcode:
Tel No: N/A	Tel No:
	Nobile No:
	mail:
Signature:	Date: 01/04/2019
wase be aware that anonymous forms cannot be mments to be considered you MUST include you would you like to be kept updated of future solution 2020, 20252 (namely and applicable).	ur details above.
nspector's recommendations and adoption of the	an for examination publication of the
res ☐ (Via Email)	No No

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which	part of the Local f	Plan does this represe	ntation relate?	a Marine a section
-PAOS	/ diagram / table	Policies Map	Sustainability Appraisa!	Habitats Regulation Assessment
Other document a part/section		le ()		
4. Do you o	onsider the St Hele	ens Borough Local Pla	n 2020-2035 is:	
Please read	the Guidance note f	or explanations of Legal	Compliance and the	Tests of Soundness
Legally Con	npliant?	Yes 📉	No	todo or dodridricas
Sound?		Yes 🗆	No.X	
Complies w	ith the Duty to	Yes 🗆	No C	
Cooperate			1	
5. If you con Please read Positively Plustified?	the Guidance note f		cause it is not: ests of Soundness	rest model Not the according
Effective?		X		
	add N. C. I.D. C.	8		
Consistent v	with National Policy	? 🗶		
If you wish to box to set on Not justified population of One of the population of th	o support the legal ut your comments the council should for the feet out of St Helens has depurposes of the Great courses of the Great	compliance or sound	ness of the Local Planess of the Local Planess of the Local Planes of it's population estimated are all the extra	people coming from?

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. 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 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.

COURT



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 thy this modification will make the Local Plan legally compliant or sound. It will be helpful if your 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.

Policy LP AOB	Paragraph / diagram / table	Policies Map	145	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other docum document an part/section)	ents (please nam d relevant	ne				
	nsider the St Hele ne Guidance note t	or explanations			Tests of Soundness	
Legally Com	pliant?	Yes 🗷		Nc -		
Sound?		Yes 🗆	s 🗆		No 🗷	
Complies wit	h the Duty to	Yes 🗆		No C		
Cooperate	appropriate					
Please tick as a	pp. spr. sa					
Please tick as a 5. If you cons	sider the Local Pl				and was the same	
Please tick as a 5. If you cons	sider the Local Pl he Guidance note				and the second	
5. If you cons	sider the Local Pl he Guidance note	for explanations				
5. If you cons Please read to Positively Pressure 1	sider the Local Pl he Guidance note					

6. Please give details of why you consider the Local Plan is not legally compliant 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/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 1H. 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.

1HS

30483



Please continue on a separate sheet if necessary

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Pase note your representation should cover succinct oporting information necessary to support / justify the addition, as there will not normally be a subsequent or seen tations based on the original representation at the stage, further submissions will be only at matters and issues he/she identifies for examination to the second of the second of the second of the original representation at matters and issues he/she identifies for examination to the second of the second of the original representation to the second of the second of the original representation to the second of the second of the original representation to the second of the second of the original representation to the second of the second of the original representation to the original representation to the original representation at	e representation and suggested at opportunity to make further the publication stage. It the request of the Inspector, based ation. Yes, I wish to participate at the oral examination
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Mo, I do not wish to participate at the oral examination	ation. ວັນ ແລະປະເທົ່າຍວະລະນາ/ ພັນແກ່ດາວເຂົ້າ Yes, I wish to participate at the oral 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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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

2 4 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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: URS	Title:
First Name: RUTH	First name:
Last Name: HAUGH	Last Name:
Organisation/company: NIA (RESIDENT)	Organisation/company:
Address: 12 FALKLAND OR GARSNOOD	Address:
Postcode: NNU OSQ	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 01/04/2019

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

	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the
Inspector's recommendations and	
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 <u>PART B</u> of this form, setting out your representation/comment.

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

PART B - YOUR REPRESENTATION

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

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

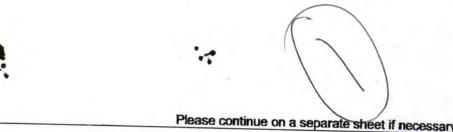
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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. 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 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.



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 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.

Policy	Paragraph	Policies		Sustainability	Habitats Regulation
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6. Please give details of why you consider the Local Plan is not legally compliant at its unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

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Please continue on a separate sheet if necessary

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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

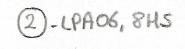
Yes, I wish to participate at the oral examination

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.



Page 1 of 1



Response to Local Plan Stephen Haw to: planningpolicy 12/03/2019 17:15

1 Attachment



Stephen Haw response to Local Plan.docx

Please find attached my response to the St Helens Local Plan Publication period.

Kind regards Stephen Haw St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) Planning Department Victoria Square St Helens WA10 1HP

Date: 13 March 2019

Reference: St Helens Local Plan 2020 -2035

Dear Sir or Madam,

I am writing to object to the St Helens Council Local Plan (2018). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

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

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

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

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

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

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and a

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

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

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more; Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more; Daily average speed will change by 10km/hr or more; and Peak hour speed will change by 20km/hr or more".

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

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

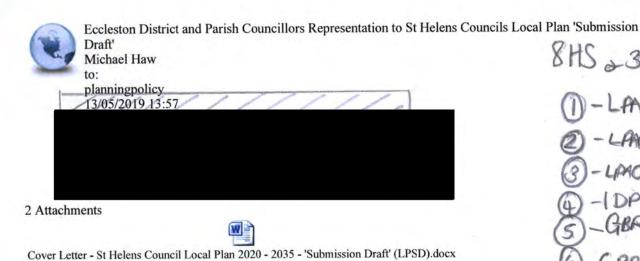
For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional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

Yours sincerely,

Stephen Haw

12 Kiln Lane Windle St Helens Merseyside WA10 6AB (2)





Eccleston District & Parish Councillors Representation - St Helens Council Local Plan 2020 - 2035 'Submission Draft' (LPSD).pdf

Dear Sir or Madam,

Please find attached the Eccleston District and Parish councillors representation to St Helens Council's Local Plan 'Submission Draft'.

If you could please confirm receipt that would be appreciated.

Kind regards,

Michael

Cllr Michael Haw
Eccleston District and Parish Councillor
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) Planning Department Victoria Square St Helens WA10 1HP

Date: 13 May 2019

Dear Sir or Madam,

RE: Representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD)

Please find enclosed our detailed representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD).

We understand and support the production of a Local Plan in coordinating future investment across St Helens, however, we do not support the LPSD in its current form. There has been a great deal of public backlash against the proposals and site allocations (and "safeguarding") and we strongly urge St Helens Council to review its evidence base and forecasts which has led to the encroachment into Green Belt land.



- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites and remediate contaminated land for housing development;
- Whilst we welcome the proposed reduction of Green Belt land to be released within the Local Plan, it
 remains our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for entirely
 by those developers and house builders that have land interests within the Borough;
- We have major concerns about the scale of growth being aspired to within the Local Plan and the
 infrastructure required to support it. The IDP highlights quite well the projects currently underway in
 the Borough to try to alleviate the problems of today, however seems to lack any substance on what
 will be done to solve the issues of the future. This needs to be urgently addressed;
- The proposals represent a significant over development of Eccleston and Eccleston Park, which will change the very character of our local area forever.

Yours sincerely,

Michael Haw, Teresa Sims and Geoff Pearl

Eccleston District & parish councillors
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 *'Submission Draft'* (LPSD)

Representation by Eccleston
District and Parish councillors Michael Haw, Teresa Sims and
Geoff Pearl

13 May 2019

Context

We are responding to the St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) in our capacity as Eccleston District & Parish councillors on St Helens Metropolitan Borough Council and Eccleston Parish Council.

We wish to voice both our own concerns and those of residents that reside in Eccleston/Eccleston Park, many of which have contacted ourselves as their elected representatives about the proposals contained within the LPSD and Green Belt Review being brought forward by St Helens Metropolitan Borough Council (SHMBC).

The LPSD represents SHMBC's plans for the management of land for housing, commercial and industrial use over the next 15 years. It will have a permanent effect on not only the location, but the shape and character of Eccleston/Eccleston Park and will impact the lives of many families for generations to come.

We would like to make clear from the outset that we are not against building and housing developments per se, nor are we against the concept of a Local Plan itself. On the contrary, we think a planned approach to sharing housing allocation strategically across St Helens is to be welcomed. Of course, we need to provide new developments in order to provide jobs, and housing where needed for now and generations to come. However, this should be done in a way which is sensitive to both the local environment and the wishes of local communities. It should also be only where there is genuine need, and where the infrastructure exists to support such developments. The LPSD will fundamentally change the local area in which local residents reside.

It is in that spirit that we wish to raise some specific concerns about the methodology behind the LPSD and Green Belt Review and also the salient issue of protecting Green Belt land and promoting, as far as possible, developments on alternative previously developed brownfield/contaminated sites, instead.

Approach

As a local community, we support well planned and quality development. We know that to retain existing families in Eccleston, Eccleston Park and St Helens we must provide the right mix of new jobs, homes, public services and quality of life. As such, we have approached this 'Publication Period' (and subsequent consultation on the 'Preferred Options' document) with the intent of being balanced and recognising some positive aspects of the LPSD document, and more locally the work of SHMBC in seeking to regenerate the Borough.

We recognise that little of this is easy, much of it is long term and at times it can be difficult to balance competing demands. We have been mindful through this process of the need to ensure any assumptions are scrutinised and that the evidence base is thorough and in context. We also seek to balance the need to regenerate through physical development, and the pressing need for social progress in education, skills, health and quality of life.

As local councillors, we have carried out visits to each of the sites proposed to be released from the Green Belt for development and those impacting on local people. We have also reviewed and referenced over hundreds of emails and letters that have been sent to us as councillors from local residents. In addition to this, we also held two public meetings in Eccleston and Eccleston Park that were attended by over 800 people in total.

We have read the LPSD, its background papers and supporting studies and reviews, as well as the evidence base informing SHMBC's Local Plan. We have also reviewed localised datasets from ONS (Office of National Statistics), Ministry of Housing, Communities & Local Government (MHCLG), Department of Environment, Food and Rural Affairs (DEFRA), as well as public bodies.

This submission is not intended to 'out expert' the planners and economists, but to ask the obvious questions that many Eccleston/Eccleston Park residents are asking about how the forecasts and housing projections have been arrived at.

Local community response

There is no doubt, that the proposals entwined within the emerging LPSD have been <u>highly controversial</u>, not only in Eccleston/Eccleston Park, but across St Helens, with 97% of those that responded to the *'Preferred Options'* consultation (5 December 2016 to 30 January 2017) stating that they do not support the fledgling Local Plan and any proposals to release land from the Green Belt for development purposes. In Eccleston/Eccleston Park, there are two proposals to re-designate Green Belt land (3HS & 8HS) and so-called *"safeguard"* for *"potential future development"*, which have been met with <u>fierce</u> opposition from local residents.

Over the course of the consultation period, several local community action groups have formed across Eccleston/Eccleston Park and the surrounding areas, such as *'Eccleston Community Residents Association'* (ECRA) and Rainhill Save Our Green Belt (RSOGB) to oppose and challenge the proposals to remove Green Belt land for potential future development.

As local councillors, we have received a large number of emails, phone calls and letters, with many detailed and well researched submissions put forward as part of the 'Preferred Options' consultation and 'Publication Period' process. Local people are open to positive development, but quite rightly value the unique character of our local area and carry strong and respectable views on how development should proceed in the future.

Representation to the LPSD

The text below is our representation to SHMBC's LPSD, which follows the structure of the council's representation form.

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

- LPA05
- LPA06
- LPA07
- LPA08
- Green Belt Review (2018)

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

- Legally Compliant? No
- · Sound? No
- Complies with the Duty to Cooperate? No

Section 5: If you consider the Local Plan is unsound, is it because:

- Positively Prepared? No
- Justified? No
- · Effective? No
- Consistent with National Policy? No

Section 6 and 7: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

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

General Overview

Positively prepared?

We believe that the predetermined housing growth is based on unreasonable assumptions and a very small evidence base, with nothing to underpin these aspirational figures. This results in an over-supply of housing. The figures quoted in the plan (ONS 2014) should be replaced by the more up-to-date ONS (2016) which uses more current data.

The Local Plan is unsound because it has not been positively prepared.

Justified?

St Helens has more than enough land (previously developed brownfield and contaminated land) to meet local housing need. Therefore, there is no need for the former Eccleston Park Golf Club site (3HS) and Land South of the A580 between Houghtons Lane and Crantock Grove (8HS) to be removed from the Green Belt and so-called "safeguarded" for potential future development.

The very fact that the land is proposed to be "safeguarded" for 15 years supports this statement, with enough land in place to provide this Borough's housing requirement during the Local Plan period (2020 – 2035). There are no "exceptional circumstances" for the land to be released from the Green Belt and it should remain so, until evidence can be provided to support such "exceptional circumstances".

The Local Plan is unsound because it is not justified.

Effective?

The Infrastructure Delivery Plan is particularly weak. In the areas suggested for housing development, there are already school's shortages and major transport problems. In particular, the 8HS and 3HS sites have considerable highways and local infrastructure issues, which are highlighted within the St Helens Green Belt Review document and as such, no development should be considered on either site.

The Local Plan is unsound because it is not effective.

Consistent with National Policy?

The Plan does not comply with NPPF (2018) as it was written prior to publication. Neither does it consider the more accurate and up-to-date housing and employment statistics in ONS (2016) figures. Furthermore, SHMBC has not provided any evidence to date that they have satisfied their 'duty to cooperate', which is essential, especially within the context of neighbouring local authorities, who are also bringing forward their own Local Plan's, such as Warrington, West Lancs and the Wirral.

The Local Plan is unsound because it is not consistent with National Policy.

Conclusion

Taking all of the above cumulatively, we believe that the local plan in its current form – when examined by the Planning Inspector, cannot be justified, effective, consistent with national policy or positively prepared and as a consequence, it would surely follow that it is therefore unsound.

Policy specific comments

LPA04 - A Strong and Sustainable Economy

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

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

Modification:

The economic analysis is flawed and based on over-optimistic assumptions, which mean that the level of land needed is therefore not as high as set out in the Local Plan. Therefore, there are no exceptional circumstances to change Green Belt boundaries. As such, SHMBC should bring forward more realistic economic growth predictions that are line with neighbouring local authorities which in turn will have less impact on the environment, lead to less need for new infrastructure and protect Green Belt land from unnecessary development.

LPA05 - Meeting St. Helens Borough's Housing Needs

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

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

2



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

Modification:

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

LPA06 - Safeguarded Land

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

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

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

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

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

Modification:

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

LPA08 - Infrastructure Delivery and Funding

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

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

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP. The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best.

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

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

Compared to other areas of St Helens, Eccleston and Eccleston Park has provided its fair share of new housing in recent years, which has placed our local infrastructure and other key services under immense strain. The idea that we as a local community can accommodate the level of housing development being proposed within the Local Plan without a clear and defined IDP, is simply not acceptable.

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

Modification:

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



Green Belt Review (2018) - Site specific comments

Former Eccleston Park Golf Course site (3HS)

We **STRONGLY OBJECT** to the former Eccleston Park Golf Course site (3HS) being so-called "safeguarded" for potential future development. Our reasons are listed below:

- In Green Belt terms, 3HS separates St Helens, Rainhill and Prescot which resides within Knowsley.
 The purpose of Green Belt (point 2) states: "To prevent neighbouring towns from merging into
 one another". In this regard, the sub-parcel plays a "key role in forming a strategic gap and the
 perception of a gap between Rainhill and Thatto Heath (St Helens Core Area)". If the site was
 removed from the Green Belt, this would significantly undermine this whole area of Green Belt
 and lead to further calescence of settlements in St Helens (Eccleston and Rainhill) with Thatto
 Heath and Prescot in Knowsley;
- Until recently the site was in recreation use. As such it is protected by Core Strategy Policy (CP2)
 and Policy of the Submission Draft (LPA11). Identification as "safeguarded" land conflicts with
 development plan and emerging development plan policy;
- Sport England have previously objected to the allocation of this site and the Council acknowledge
 that "further evidence is required to meet the requirements of Sport England" (Green Belt Review,
 page 118). The Green Belt Review goes on to state "This further evidence has not been obtained"
 and that at present "the allocation of the site would conflict with national planning policy";
- The site has numerous physical constraints, including: Substantial highways issues surrounding
 the site; electricity pylons; noise issues; various sewers; a trunk water main; the North Prescot
 Aqueduct; and the Vrynwy Aqueduct/pumping station.

Land south of A580 between Houghtons Lane and Crantock Grove (8HS)

We also **STRONGLY OBJECT** to Land south of A580 between Houghtons Lane and Crantock Grove (8HS) being so-called "safeguarded" for potential future development. Our reasons are listed below:

- In the Green Belt Review, SHMBC scores it low on all of the Green Belt purposes assessed. Whilst
 the geographical location of the sub parcel does mean it will have a low score in terms of Green
 Belt purpose 1 "merging". The Council's own conclusions on purposes 1 and 3 within the Green
 Belt Review are both inconsistent and erroneous. The release of this parcel will see the built-up
 area sprawl up to the boundary with the A580 and will see the loss of a large area of countryside.
 Release of this area conflicts with Green Belt policy.
- 2. In the Green Belt Review, the Council acknowledge the following:
 - The site is high quality agricultural land;
 - The development of this area would form a "sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge".;
 - "Significant" improvements to highways infrastructure would be required, despite the most recent highways works at Windle Island;
 - 4. A new bus route would be required;
 - 5. The site is likely to provide functionally linked habitat for a number of bird species.

The very fact that it is high quality agricultural land should be enough of a reason NOT to develop
this site, especially given the amount of previously developed brownfield land available in St
Helens. Indeed, St Helens has a legacy of land contamination arising from industrial development
and other related operational practices. Instead of being viewed as a hindrance to future
development, this land should be viewed as an opportunity to assist in regenerating our Borough,
to help revitalise our Town Centre, to improve our local environment and protect our Green Belt.

For example, when the Local Plan process began, we were told that there wasn't enough brownfield land to cater for our development needs, yet, two new brownfield sites have since been put forward for housing development, land at the Cowley Hill Works near the town centre (816 new homes) and the former Suttons distribution centre (350 new homes), thus reducing the need for Green Belt release.

By releasing land from the Green Belt now, this Council will merely be inviting pressure from developers to expedite the development of this much easier and more profitable option, which could see the regeneration of further viable brownfield sites kicked further down the road;

- Development on this land would be a sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge, which is not acceptable. Eccleston is a semi-rural community and this development would change the very character of the area in which we represent;
- 3. Despite the recent "improvements" to Windle Island to quote SHMBC, to cater for upwards of 1000 new homes, there would have to be substantial highway improvements to cater for the hundreds, if not thousands extra vehicles. The so-called improvements to Windle Island are to enable greater levels of traffic on the A580 between the Liverpool SuperPort and the logistics hubs as you head towards Haydock and Golborne and the M6 motorway.

The junction with Bleak Hill Road and Rainford Road is one of, it not the worst junction in St Helens, with a number of accidents occurring in recent years. The junction cannot cope with the levels of traffic now and the idea, that we as a local community can cater for that level of housing (1,027 referenced within the LPSD), without clearly defined infrastructure improvements at that junction, is quite frankly ridiculous and any proposals to "safeguard" the site for development should be refused;

4. Concerning the proposed new bus route. Over the last 5 years, Eccleston and Windle has seen local bus services decimated, with a number of key bus routes taken out of service by Merseytravel due to "budgetary pressures". For example, the much used 137/138 & 194/195 hourly bus service that provided a vital link between Eccleston and Whiston Hospital and other key settlements was taken out of service. As local councillors, we oversaw a local community campaign calling on Merseytravel to reinstate the bus service. Despite a petition being submitted to the Liverpool City Region Combined Authority Transport Committee, signed by 825 residents, our request was ignored and refused, again, due to so-called budgetary pressures. Any proposals for a new bus route must be considered within this context.

St Helens Star article: https://www.sthelensstar.co.uk/news/16835268.hundreds-sign-petition-for-return-of-137138-and-194195-hourly-bus-services-to-hospital/

Merseytravel response to petition: "Merseytravel is aware of the difficulties in travelling between the Eccleston area and Whiston Hospital/Prescot since the withdrawal of the 137/138. As part of this review,



and continually before that, we have tried to find ways of using existing resource to reinstate a direct link that comes at a minimal cost, but unfortunately this is not possible at this time. There is insufficient money in the supported bus services budget to cover the cost that even a reduced service would require. We will continue to explore ways and look for opportunities to reinstate this important link".

5. The 8HS site is a functionally linked habitat for a number of bird species, and on this fact alone, any proposed development of the site should be refused out of hand. The 8HS site is enjoyed by a large number of residents (including school children), many of which enjoy the tranquility and local wildlife of what is a beautiful piece of Eccleston. Too often when it comes to planning and development, the environmental concerns get overshadowed by other factors, but, in this instance the environmental issues cannot be ignored. Whilst previously developed brownfield sites sit idle, it would be inexcusable, reprehensible in fact for any potential development to take place on this piece of land. It should be taken out of the LPSD altogether and protected from any potential future development.

Overall conclusion & submission findings

- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens
 Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver
 balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- The presumption for Green Belt development needs to change to reflect current planning guidance, that is, it should only be used in 'exceptional circumstances';
- It is our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for
 entirely by those developers and house builders that have land interests within the Borough;
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites
 and remediate contaminated land for housing development. More needs to be done by St Helens
 Council to remove obstacles for developers to commit to brownfield and Town Centre
 regeneration and development, including decontaminating land that can be used for housing
 development;
- St Helens Council must give more regard to the availability and capacity of local infrastructure in
 those areas where potential developments are being proposed. We have major concerns about
 the scale of growth being aspired to within the Local Plan and the infrastructure required to
 support it. The IDP highlights quite well the projects currently underway in the Borough to try to
 alleviate the problems of today, however seems to lack any substance on what will be done to
 solve the issues of the future. This needs to be urgently addressed;

 The proposals represent a significant over development of Eccleston and Eccleston Park, which will change the very character of our local area forever.

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

Yes, we wish to participate at the oral examination.

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

As Eccleston District and Parish councillors, representing the views and interests of Eccleston/Eccleston Park residents, we feel that it would be deeply beneficial for us to participate at the oral part of the examination.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

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1 3 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mes	Title:
First Name:	First name:
Last Name: HAWLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 133 WINDLE HACL DRIVE, ST HELENS Postcode: WALD GRA	Address: Postcode: Tel No:
	Mobile No:
	Email:
Signature:	Date: 12.5.19-

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 I Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	L ocal e
Yes ☑ (Via Email) No ☐	
Please note - e-mail is the Council's preferred method of communication. If no e-maddress is provided, we will contact you by your postal address.	ail



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

1 3 MAY 2019

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

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mc	Title:
First Name: Matthew Jack	First name:
First Name: Matthew Jack Last Name: Hawley	Last Name:
Organisation/company:	Organisation/company:
Address: 11 Andromeda Way	Address:
New Bold, St. Helens	
Postcode: WA9 LZQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13.04.19
lease be aware that anonymous forms comments to be considered you MUST inc	annot be accepted and that in order for your clude your details above.
	future stages of the St Helens Borough Local of the Plan for examination, publication of the tion of the Plan) No
Please note - e-mail is the Council's pre	eferred method of communication. If no e-mail



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

Ref: LPSD

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

EIDS YAM E !

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MiSS	Title:
First Name: Charlotte Mosemory	First name:
Last Name: Hawley.	Last Name:
Organisation/company:	Organisation/company:
Address: 11 Andromeda way New Bold, St Helens	Address:
Postcode: WA942Q	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13/4/19.

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.		

Representor Details

Web Reference Number	WF0147
Type of Submission	Web submission
Full Name	Mr David Hawley
Organisation	
Address	11 Andromeda Way
	New Bold WA9 4ZQ
Agent Details	

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

Yes (via e-mail)

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

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

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

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

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	3/12/2019 8:12:04 PM

Representor Details

Web Reference Number	WF0105
Type of Submission	Web submission
Full Name	Miss Laura Haworth
Organisation	
Address	12 Ruthin Court WA7 2GL
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Building on green belt land is unacceptable when sufficient brown field sites are still available. the extra traffic caused by building and houses will cause stress to the road network and impact current residents. there isn't sufficient amenities to support more developments. There are Bats that frequent the proposed site as well as other wildlife such as Barn Owls and these are endangered

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

the plan needs to be found a different site

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

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

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

Response Date	3/13/2019 10:49:16 AM

Representor Details

Web Reference Number	WF0107
Type of Submission	Web submission
Full Name	MR IAN HAWORTH
Organisation	
Address	47 HONEYBOURNE DRIVE
	WHISTON L35 7NB
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	local plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

Is legally compliant?	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

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

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

I am not too concerned with the legality of the plan. It concerns me that the local environment, air pollution, wildlife and increased traffic will have a detrimental effect of mine and my families health and wellbeing. Within 2 miles of my house there have been 4 major housing development and the roads and local services are struggling to cope. These have all been built on brownfield sites and the most recent one in Scotchbarn lane has caused flooding on existing neighbouring properties . I think it is inexcusable to build on greenbelt sites once these have gone they are gone forever along with the wildlife. There are plenty of brownfield sites which can be built on around the borough or aren't the developers so keen on this as there are added costs affecting their profits.

Regards

lan

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

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

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

Response Date	3/13/2019 10:34:36 AM
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

19 TAM 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name:	First name:
PATRICIA	Last Names
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 114 GARTONS LANE	Address:
CLOCK RACE	
Postcode: NA9 4Q2	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 11. 3. 19.
Please be aware that anonymous forms cannot comments to be considered you MUST include	your details above.
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of the Inspector's recommendations.	Plan for examination, publication of the
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferred address is provided, we will contact you by you	d method of communication. If no e-mail

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	lion pai	Paragraph		Policies	-	ntation relate? Sustainability		Habitats
Olicy	+	/ diagram / table		Map	+	Appraisal/ Strategic Environmenta Assessment		Regulation Assessment
		nts (please nan	ne					
locume art/sec		relevant				-	*	
. Do vo	ou cons	ider the St Hel	ens Bo	rough Lo	cal Pl	an 2020-2035 is		
Please r	ead the	Guidance note	for expl	anations o	of Lega	I Compliance and	the Tes	ts of Soundness
	Compli		Yes	3		N	0	
Sound?	,	*	_	; 			0 -	
		the Duty to	Yes	3 🗆		N	0 🗗	
Cooper				(8)				
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		n National Police						
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or fails	to com	oly with the dut	y to co	operate.	Pleas	e be as precise	as poss	ble.
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After this stage, further submissions will be only on matters and issues he/she identifies for example. 8. If your representation is seeking a modification; do the oral part of the examination? (the hearings in publication)	at the request of the Inspector, based ination. you consider it necessary to participate at
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

1 3 MAY 2019

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: CLAIRE	First name:
Last Name: HAYES	Last Name:
Organisation/company:	Organisation/company:
Address: 3 SANDY LANE STOCKTON HEATH, WARRINGTON	Address:
Postcode: WALL-2.A.Y	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 30/8/19 ·

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

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

Representor Details

Web Reference Number	WF0259
Type of Submission	Web submission
Full Name	Ms Joanna Hayward
Organisation	JAK Fine Art Printing
Address	502 Garswood Road
	Garswood WN40XH
Agent Details	Adrian Storey

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

Yes (via e-mail)

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

Policy	LPA 06 - Site 1HS
Paragraph / diagram / table	Housing at Billinge Road Garswood
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Council should be put to strict proof of ists population estimates. The population of St Helens has been in decline since 1981. In fact the population of Britain is estimated to be on the decline. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

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

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

Delet this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 2:43:41 PM

Representor Details

Web Reference Number	WF0260
Type of Submission	Web submission
Full Name	Ms Joanna Hayward
Organisation	JAK Fine Art Printing
Address	502 Garswood Road
	Garswood WN40XH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 Sites 2EA, 5EA 6EA
Paragraph / diagram / table	Housing between Liverpool Road, Millfield Lane
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 2:35:44 PM

Representor Details

Web Reference Number	WF0270
Type of Submission	Web submission
Full Name	Ms Joanna Hayward
Organisation	JAK Fine Art Printing
Address	502 Garswood Road
	Garswood
	Ashton-in-Makerfield WN40XH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05 - Site 1HA
Paragraph / diagram / table	Housing at Smock Lane, Garswood
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

The release of Greenbelt will cause significant harm to the purposes of Greenbelt. Brown belt should be used (however expensive or small) should be used for housing rather than greenbelt.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 12:19:12 PM
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13/03/2019 14:37

Hello,

Re the plan above, I am concerned that there has been no consultation with Natural England re the loss of Grade 1 agricultural land, its removal from the green belt, and this being the only one of the 4 sites scoring red in the sustainability appraisal that has not been discarded. There are no exceptional circumstances to change Green Belt boundaries. Yours sincerely, Gillian Heath

Old Bull Cottage Red Cat Lane Crank

Sent from my iPad



Local plan for St Helens Sarah Heath to: planningpolicy

13/03/2019 15:05

From.

To: planningpolicy@sthelens.gov.uk

Dear Sirs

I refer to the Local Plan proposed for St Helens.

I wish to make the following points in relation to the plan overall:

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- · The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

With regard to the areas specific to Rainford (8HA Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Yours faithfully

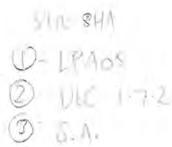
Sarah Heath 12 Walmesley Drive Rainford St. Helens WA11 8EN

Sent from my iPad

660202



Local plan for St Helens Margaret Heath to: planningpolicy 13/03/2019 15:10 Hide Details



Dear Sirs

I refer to the Local Plan proposed for St Helens.

I wish to make the following points in relation to the plan overall:

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

With regard to the areas specific to Rainford (8HA Rookery Lane)

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- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Yours faithfully

Margaret Heath 21 Finchley Drive St. Helens WA11 9EW

Sent from my iPad





Ref: LPSD

2 0 FEB 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 <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

Inspector's recommendations and adoption of the Plan)

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

Yes (Via Email)

Title:
,
First name:
Last Name:
Organisation/company.
Address:
Postcode: /
Tel No:
Mobile No:
:
ate: 11/2/19
accepted and that in order for your

Please note - e-mail is the Council's preferred method of communication. If no e-mail

No 🗌

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

Plese	see.	attached	1-11-
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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.

Policies Paragraph	Policy			esentation relate?	
A. 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? Sound? Yes No Complies with the Duty to Cooperate Please tick as appropriate Figure 1 Sound 1 Sound 2 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? Sound 2 Sound 3 Sound 4 Sound 5 Sound 6 Sound 7		/ diagram / table	Мар	Appraisal/ Strategic Environmental	Regulation
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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.

Please see attack lette

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 see attack lett

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

St Helens Council

Town Hall

Victoria Square

St Helens

Merseyside

WA10 1HP.

6 Begonia Gardens

New Bold Green

St Helens

WA9 4FT

Thursday 14th February, 2019

RE: Consultation Local Plan

Dear Sir and Madam

I am writing to object about your plans to develop the land (site ref HS03) which is the farmers fields that are across the road from the New Bold Green/New Bold Place Estate.

I would have completed the form but my concerns are in connection with the land near where I live and I do not want to comment on the Local Plan as a whole. I did look at the form but couldn't figure out what to complete so decided a letter would be better instead.

I therefore decided to put my concerns in writing to you instead.

I understand that the land will remain with the farmer for agricultural use until he decides he wants to sell and then it would be ring fenced for development purposes.

I feel that the land should be kept as farmers fields or as a green belt area.

DO NOT AGREE THAT THIS LAND SHOULD BE SOLD OFF FOR DEVELOPMENT PURPOSES - EITHER FOR HOUSES OR INDUSTRIAL UNITS IF THE FARMER SELLS HIS LAND.

Here are my comments, concerns and objections:

Why I moved to New Bold Green

I moved into my home when the estate was being built 16 years ago. The reason I moved onto the estate was I loved the houses, the area itself and the estate.

Another reason was the fact that the view from the back of my home is beautiful farmland with lovely views. Due to the fact that I love where I live I have invested a great deal of money in my home, with extensions, garage conversions and landscaping to my gardens. I feel that the money that I have invested in my home will be wasted if the land is developed as I feel my home will depreciate in value and all the money that I have spent would be wasted as the area will be spoilt. At the moment houses sell quickly and for good prices on the estate as its a very desirable place to live. If the area is then built up with more houses etc it will be spoilt.

I have loved living in my home and that's why I have lived here for 16 years and am really happy living in a semi -rural location. Its one of the best places to live in St Helens.

Currently I have no plans to move but if you go ahead build houses or units on the farmers fields I would definitely leave and move out of St Helen's and go and live in another area where the council cares about keeping green belt areas and looking after their residents better.

I am born and bred St Helen's but feel I feel so angry at the moment and let down.

When I heard /read about your proposals I creied. I don't want anything built on the fields at the back of my home not even houses. Houses would be bad enough but the suggestion of industrial units would be awaful.

There are plenty of brownfield and greenfield sites which are not located near peoples homes that could be used for development. These should be used instead. I feel that you are trying to spoil St Helen's not improve it with your plans.

I worry also about:

Infrastructure

There are not enough shops, schools, health facilities, transport links, facilities etc to cope with the people that currently live in the area and St Helen's let alone more people, homes, vehicles on the road, etc without adding to the problem.

In addition St Helen's Town Centre is looking like a ghost town with shops moving out all the time leaving empty shop units. Who would want to come and live in St Helen's with poor facilities that we currently have so why build more houses. Most people who want to go shopping or eat out etc travel out of the borough to places like Manchester, Liverpool, Chester to shop, eat out as its so poor in St Helens.

The main Road

Also the road at the back of my home is busy and noisy and when lorries go past the house shakes. If the traffic increases its going to be unbearable. The traffic speeds as well. Most people don't keep to speed limit. Its going to be dangerous, noisy and very polluted.

Drainage

The drainage on my estate is very poor and I have to spend hundreds of pounds sorting out drainage in my back garden as it pools with water near the back of the garden. The main road at the back of my home floods when it rains heavily and has had to be closed before now. The farmers fields are water logged. If you were to allow buildings on this land its more than likley, to increase the flooding problems and could lead to our homes being flooded. You are stirring up lots of problems for the future.

Finally:

I am not writing this letter lightly. I am really worried. I have worked very hard all my life and I was hoping to continue living in my home right into the future. I am now worried about what its going to be like living here is development works go ahead, my home depreciating in value and the knock on effects to my financial situation in the future.

I hope that you will seriously consider my comments, concerns and objections when making your decisions on the future of the land and most importantly my future,

Yours Sincerely

Beverley Heaton

AMEDEO LETTER - 4NA

Local Plan

St Helens Council

Town Hall

Victoria Square

St Helens

Merseyside

WA10 1HP.

6 Begonia Gardens

New Bold Green

St Helens

WA9 4FT

Thursday 14th February,2019

RE: Consultation Local Plan

Dear Sir and Madam

4HA

I am writing to object about your plans to develop the land (site ref HS03) which is the farmers fields that are across the road from the New Bold Green/New Bold Place Estate.

I would have completed the form but my concerns are in connection with the land near where I live and I do not want to comment on the Local Plan as a whole. I did look at the form but couldn't figure out what to complete so decided a letter would be better instead.

I therefore decided to put my concerns in writing to you instead.

I understand that the land will remain with the farmer for agricultural use until he decides he wants to sell and then it would be ring fenced for development purposes.

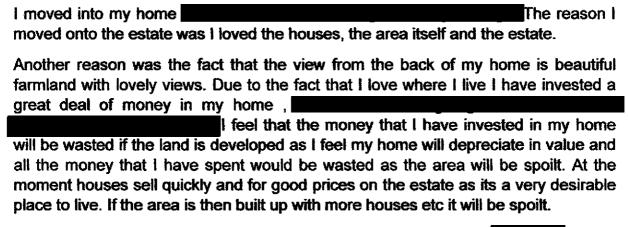
I feel that the land should be kept as farmers fields or as a green belt area.

I DO NOT AGREE THAT THIS LAND SHOULD BE SOLD OFF FOR DEVELOPMENT PURPOSES - EITHER FOR HOUSES OR INDUSTRIAL UNITS IF THE FARMER SELLS HIS LAND.

eios VAM o 1

Here are my comments, concerns and objections:

Why I moved to New Bold Green



I have loved living in my home and that's why I have lived here for an am and am really happy living in a semi -rural location. Its one of the best places to live in St Helens.

Currently I have no plans to move but if you go ahead build houses or units on the farmers fields I would definitely leave and move out of St Helen's and go and live in another area where the council cares about keeping green belt areas and looking after their residents better.

I am born and bred St Helen's but feel I feel so angry at the moment and let down.

I don't want anything built on the fields at the back of my home not even houses. Houses would be bad enough but the suggestion of industrial units would be awaful.

There are plenty of brownfield and greenfield sites which are not located near peoples homes that could be used for development. These should be used instead. I feel that you are trying to spoil St Helen's not improve it with your plans.

I worry also about:

<u>Infrastructure</u>

There are not enough shops, schools, health facilities, transport links, facilities etc to cope with the people that currently live in the area and St Helen's let alone more people, homes, vehicles on the road, etc without adding to the problem.

In addition St Helen's Town Centre is looking like a ghost town with shops moving out all the time leaving empty shop units. Who would want to come and live in St Helen's with poor facilities that we currently have so why build more houses. Most people who want to go shopping or eat out etc travel out of the borough to places like Manchester, Liverpool, Chester to shop, eat out as its so poor in St Helens.

The main Road

Also the road at the back of my home is busy and noisy and when lorries go past the house shakes. If the traffic increases its going to be unbearable. The traffic speeds as well. Most people don't keep to speed limit. Its going to be dangerous, noisy and very polluted.

The drainage on my estate is very poor and I have to spend hundreds of pounds sorting out drainage in my back garden as it pools with water near the back of the garden . The main road at the back of my home floods when it rains heavily and has had to be closed before now. The farmers fields are water logged . If you were to allow buildings on this land its more than likley, to increase the flooding problems and could lead to our homes being flooded. You are stirring up lots of problems for the future.

I am not writing this letter lightly . I am really worried. I have worked very hard all my life and I was hoping to continue living in my home right into the future . I am now worried about what its going to be like living here is development works go ahead, my home depreciating in value and the knock on effects to my financial situation in the future.

I hope that you will seriously consider my comments, concerns and objections when making your decisions on the future of the land and most importantly my future,

Yours Sincerely

Beverley Heaton

1 3 MAR 2019

PFO784

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:

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

www.sthelens.gov.uk/localplan

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
4. 10	Title
	Title:
A CONTRACT OF THE PROPERTY OF	First name:
Last Name: HEATON	Last Name:
Control of the Contro	Organisation/company:
Address: 25 Maple CLOSE	Address:
Postcode: WNS 7P2	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12 · 3 · 20 19 ·
Please be aware that anonymous forms cann considered you MUST include your details at	not be accepted and that in order for your comments to be bove.
	re stages of the St Helens Borough Local Plan 2020-20357 ion, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred ve will contact you by your postal address.	d method of communication. If no email address is provided

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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NEXT STEPS

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

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

PART B - YOUR REPRESENTATION

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

HA LPAS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nts (please name relevant part/section	on)		
	sider the St Helens the Guidance note			d the Tests of Soundness
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Sound?		= = = = = = = = = = = = = = = = = = = =	res No	
Complies with	the Duty to Cooper	P. J.	res ☐No	
Please tick as	appropriate			
Positively Prep Justified? Effective? Consistent with	National Policy?			
or fails to co	omply with the dut	y to cooperate. Plant of the pl	ease be as precise as oundness of the Loca	
many	~~~~	· + CON 10 1	nouses.	

	t will be helpful if you are able to put forward you rext. Please be as precise as possible.
nation necessary to support/justify the represent normally be a subsequent opportunity to n	Please continue on a separate sheet if nece coinctly all the information, evidence and supporting sentation and suggested modification, as there make further representations based on the original
sentation at the publication stage.	
this stage, further submissions will be on ssues he/she identifies for examination. your representation is seeking a modifica	nly at the request of the Inspector, based on matte
ssues he/she identifies for examination.	nly at the request of the Inspector, based on matte

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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Policy 11+5 LPA	Paragraph/ diagram table	Policies Map	,	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nents (please name nd relevant part/section	on)			
	nsider the St Helens d the Guidance note			2020-2035 is: al Compliance and the	e Tests of Soundness
Legally Com	oliant?		☐ Yes	□ No	
Sound?			☐ Yes	☐ No	
Complies wit	h the Duty to Coopera	ate	☐ Yes	E NO	9
Please tick as	s appropriate				
Positively Pre Justified? Effective?	d the Guidance note pared? th National Policy?			Section of Godinarios	
or fails to o	comply with the duty	/ to cooperate l compliance	e. Please	an is not legally com be as precise as pos lness of the Local Pl	
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relates to soundness (NB please note that incapable of modification at examination). the Local Plan legally compliant or sound. suggested revised wording of any policy of	
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	Please continue on a separate sheet if 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.

Pirc 8Ha

ELO145 M_LPAOX



Comments on St Helens Local Plan Kevin Heg planningpolicy@sthelens.gov.uk

12/03/2019 23:13

Please arrange for my comments on your local plan to be passed to the planning inspector.

Dear Inspector

I am not satisfied that St Helens Council has built a satisfactory justification to support the need to remove land from greenbelt for housing.

The Council's figures do not stand up to scrutiny. It has inflated forecasts for population growth in the borough. While its Plan Version 2 includes forecasts lower than Plan Version 1, they are still not in line with official statistics. It appears to want to choose its own figures.

The Council neglected to produce a brownfield site register - so had no idea how much brownfield land was available in the borough, until public scrutiny forced its hand.

These are once in a lifetime decisions. Government policy is that greenbelt land can only be removed from greenbelt in exceptional circumstances. There are no exceptional circumstances, nor confidence in the Council forecasting evidence-based figures.

In Rainford, there is a proposal to remove land from greenbelt to build more than 250 homes. The Council says this is because the owner, wishes to sell it. This suggests the Council prefers to remove land which sellers want to sell, or buyers wish to buy, rather than land which is the most suitable for release. This cannot be right.

This land is Grade 1 agricultural land - the most fertile and productive level of classification. It is actively, annually farmed, with several crops harvested each year. It supports agricultural jobs. Elsewhere, in the first drafts of this plan, the Council outlined its assessments of all greenbelt fields in the borough - explaining, field by field, why each was suitable, or not, for release from greenbelt. Many fields were deemed unsuitable for release because they are Grade 1 agricultural land. This is inconsistent.

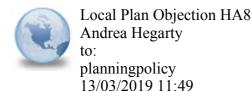
I am told the Council has failed to consult with statutory consultees, such as Natural England, and has no theory or knowledge as to the ability of local infrastructure - roads, schools, doctors - to cope with such a population rise.

There is simply no evidence to support removing this land from greenbelt.

Kevin Hegarty 47 Rookery Lane Rainford Merseyside WA11 8EG



RO0788



Dear Sir

Re HA8 Rookery Lane / Higher Lane in the St Helens Local Plan Objection

I am writing with my objections for the proposed plot for development at Rainford (HA8 Rookery Lane / Higher Lane).

I attended a drop in event in 2018 held by St Helens Council where they explained the damage car pollution can do to public health and how to limit this this. However I worry that by having the potential for 100's of houses built in the middle of the village - which will no doubt include at least 2 cars per household - the increased pollution will be impossible to avoid given we have to walk past it to get to places in the village.

I am also unable to understand why this site has been chosen by the sustainability proposal given similar areas were rejected by the council. And also why there is a need to lose grade 1 agricultural land?

I hope these concerns can be taken in to account and the plan be reviewed.

Yours faithfully

Andrea Hegarty 47 Rookery Lane, Rainford, WA11 8G

RO0789



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

Ref: LPSD

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
	First name:
	Last Name:
	Organisation/company:
Address: 85, CARMILL RD BILLINGE	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature	
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

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WA10 1HP

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3. To which	part of the Local Pla	n does this repres	entation relate?	
Policy Acos	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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	Please continue on a separate sheet if necessary
representation at the publication stage.	sentation and suggested modification, as there make further representations based on the original at the request of the Inspector, based on matters
8. If your representation is seeking a modification the oral part of the examination? (the heari	ation; do you consider it necessary to participate at ings 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 this to be necessary:	the examination, please outline why you consider

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

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

Please keep a copy for future reference.

RO0790



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

13 MAY 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: M. /2	Title:
First Name: IAN	First name:
Last Name: HENDERSON.	Last Name:
Organisation/company:	Organisation/company:
Address: 25 CRAVRORD ST CHOCK GACR ST MELONS	Address:
Postcode: WAG 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 21-4-2019.
omments to be considered you MUST in	
Plan 2020-2035? (namely submission of Inspector's recommendations and adoptions)	future stages of the St Helens Borough Local of the Plan for examination, publication of the otion of the Plan
Yes 🗌 (Via Email)	No 🗹
Please note - e-mail is the Council's pre address is provided, we will contact you	eferred method of communication. If no e-mail up your postal address.

RO0791



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PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)		
Title: MR	Title;		
First Name: MICHAEL	First name:		
LIE . I = Oil c= 1	Last Name:		
Organisation/company:	Organisation/company:		
Address: 32 SPRINGFIELD PARK HAYDOCK ST. HELENS, MERSEY SIDE	Address:		
Postcode: WAII OXR	Postcode:		
Tel No:	Tel No:		
Mobile 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.

RETURN DETAILS

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St. Helens Council

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St Helens WA10 1HP

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Policy	Paragraph/ diagram	Policies Map	Sustainability Appraisal/	Habitats Regulations
LPIA 05 Site 2HA	table		Strategic Environmental Assessment	Assessment
Sice citi			Assessment	
	nts (please name relevant part/secti	on)		
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Legally Compli	ant? DON'T K	NOW -	Yes No	
Sound?			Yes No	
Complies with t	the Duty to Cooper	rate	Yes	
Please tick as a	appropriate			
			because it is not: f the Tests of Soundness	
Positively Prepa	ared?	团		
Justified?		I,		
Effective?	11.1.2.2.2.2	\Box		
Consistent with	National Policy?	\bigvee		
or fails to co	emply with the du	ty to cooperate. <u>P</u> al compliance or s	cal Plan is not legally cor lease be as precise as po soundness of the Local F	ossible.
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any re	e me dnes t	i prevent	mis would plan	ill then
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Indicated that they wish to participate at the oral part of the examination

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
1 / (/ / / / - /	First name:
Last Name: HENDRIK SEN	
	Organisation/company:
MERICY SIDE. Postcode: WAII OXR	Postoodo
Postcode: WAII DXR Tel No	Tel No:
Mobile No:	Mobile No:
Emai	*-
	5
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.

RETURN DETAILS

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

post to: Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

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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? LPA 04 SEA, 6EA

Policy LPAP4 Sites 2to Ste 6ta	3,	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/secti	on)		
	onsider the St Helen ad the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Con	npliant?	NT KNOW [Yes No	
Sound?			Yes 🗹 No	
Complies w	ith the Duty to Coope	rate	Yes ☑ No	
Please tick a	as appropriate			
	Control of the Contro	for explanations of	because it is not: f the Tests of Soundness	
Justified?	epareu :	\square		
Effective?		\Box		
	with National Policy?			
or fails to	sh to support the leg	ty to cooperate. Pal compliance or somments.	cal Plan is <u>not legally co</u> llease be as precise as posoundness of the Local F	ossible. Plan, please also
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2. Tho	Council has	1 already	in the highway	g permission
in H	e hover bel	t in respe	of site 2E	A-Flonda
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purpo	ses of the	uneasett.	Diease conti	nue on a separate sheet if necessar

compliant or sound, having regard to the relates to soundness (NB please note that incapable of modification at examination)	onsider necessary to make the Local Plan legally matter you have identified at 6. above where this t any non-compliance with the duty to cooperate is . You will need to say why this modification will make . It will be helpful if you are able to put forward your or text. Please be as precise as possible.
belote this land from the from the Green west	e proposed nominal
	Please continue on a separate sheet if necessa succinctly all the information, evidence and supporting
ormation necessary to support/justify the repre I not normally be a subsequent opportunity to	esentation and suggested modification, as there make further representations based on the original
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ormation necessary to support/justify the repre- l not normally be a subsequent opportunity to presentation at the publication stage. ter this stage, further submissions will be of d issues he/she identifies for examination.	esentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters cation; do you consider it necessary to participate at

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RO0792



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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title:
First Name: I-IA2 EL	First name:
Last Name: HENDRIKSEN.	Last Name:
Organisation/company:	
HAYDOCK ST. HELENS	Address:
Postcode: WALL OXR Tel No:	Postcode:
Mobile No	Mobile No:
Email:	mail:
Signature:	Date: 3/3/19
	Date. 31311

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Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
4. Do you c Please re	consider the St Helen and the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Con	mpliant? Don't	know [Yes No	
Sound?			Yes 🔀 No	
Complies w	ith the Duty to Cooper	rate	Yes No	
Please tick	as appropriate		202	
5. If you co Please re	nsider the Local Plar ad the Guidance note	is <u>unsound,</u> is it for explanations of	because it is not: the Tests of Soundness	
Positively Pr	repared?	×		
Justified?		X		
Effective?		R		
Consistent v	with National Policy?	D _k		
or fails to	comply with the du	ty to cooperate. <u>Pl</u> al compliance or s	cal Plan is not legally cor ease be as precise as po oundness of the Local P	ssible.
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s possible.
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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please continue on a separate sheet if necessary

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Part B - Your Representation(s)

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: HAZEL	First name:
Last Name: HENDRIKSEN	
Organisation/company:	
Address: 32 SPRINGFIELD PK	Address:
Postcode: WAII OXE	Postcode:
	Tel No:
	Mobile No:
	Email:
	Date: 3/3/19
Signature	Date. 91 91
Please be aware that anonymous forms cannot be considered you MUST include your details above.	
Nould you like to be kept updated of future stage namely submission of the Plan for examination, pure doption of the Plan)	ges of the St Helens Borough Local Plan 2020-2 ablication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred method we will contact you by your postal address.	nod of communication. If no email address is prov

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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	n part of the Local Plan	does this repre	sentation relate? LP	A04 Sites ZEA, &
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/section)			
	consider the St Helens E			
- 4.7.77.47	ead the Guidance note for	2000	Legal Compliance and the	he Tests of Soundness
Legally Co	mpliant? Don't know	<i>~</i> □	Yes No	
Sound?			Yes No	
Complies v	with the Duty to Cooperate		Yes No	
Please tick	as appropriate			
	onsider the Local Plan is ead the Guidance note for			
Positively P	Prepared?	A		
Justified?		×		
Effective?		区区		
Consistent	with National Policy?	X	1	
or fails t	give details of why you o to comply with the duty ish to support the legal o box to set out your com	to cooperate. P compliance or s	lease be as precise as p	ossible.
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Alread	y granted plan	ning perm	respect in certain	t of sit ZEA.
	sk of froody			

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

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.

RO0793



1 2 MAR 2019

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

Ref: LPSD

(For official use only)

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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)
M on	Title:
First Name: PATRICIA HENDRIKS	Title:
1/5:00 1/5/5/1	Last Name:
Organisation/company:	Organisation/company:
Address: 21, WYEDALE ROAD. HAYDOCK, ST. HELENS.	Address:
Postcode: WAII OHN.	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 4/3/19

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Yes (via email)

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Policy Paragraph/ diagram table Policies Map Policies Map Sustainability Appraisal/ Strategic Environmental Assessment Other documents (please name document and relevant part/section)	Habitats Regulations Assessment
4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and	
Legally Compliant?	DON'T KNOW.
Sound? Yes No	
Complies with the Duty to Cooperate Yes	
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?	
Positively Prepared?	
Justified?	
Consistent with National Policy?	
Consistent with National Folicy:	

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Please continue on a separate sheet if necessary

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NO

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

Yes, I wish to participate at the oral examination

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1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent) Title: HRS .	Title:
First Name: PATRICIA	First name:
Last Name: HENDEIKSEN	Last Name:
Organisation/company:	/
Address: 21, WYEDALE ROAD, HAYDOCK, ST. HELENS.	Address:
Postcode: WAII OHN.	Postcode:Tel No:
	Mobile No:
	Email:
	11/0/10
Signature:	Date: 4/3/19

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Yes (via email)

□No

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\kn@2/2004/51.

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Policy LP04 STES 2EA SEA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other docur	ments (please name nd relevant part/secti	on)		
	onsider the St Helen ad the Guidance note		Legal Compliance and the	
Legally Com	ipliant?		∕es □ No D	nt know
Sound?			res No	
Complies wi	th the Duty to Cooper	ate 🔲	res 🔲 No	·
Please tick a	as appropriate			
Please rea Positively Pre Justified?		for explanations of	the Tests of Soundness	
Effective?				
	vith National Policy?			
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If you wisl use this b	h to support the lega oox to set out your c	al compliance or somments. I ST	oundness of the Local F ZUNGLY OBJECT	TO ABOVE APP NUMB
2 Pollution have a	nd adverse el ouslic hale a	rg capacility of whools or fact on chi	the greened of 1d Leins health to ticulates pust/	APIT). The beginn
	This Local Pl Mastructure	an has been , regulated sout and h , ange ster	to make it via	ler the people of by year decision

com relat inca the	se set out what modification(s) you con pliant or sound, having regard to the rates to soundness (NB please note that pable of modification at examination). Local Plan legally compliant or sound. gested revised wording of any policy of	matter you t any non- . You will . It will be	I have identified at 6. above compliance with the duty to need to say why this modifice helpful if you are able to pu	where this cooperate is cation will make the forward your
Del	lete this land from I wal from the Gla	the en bel	Pioposal L.	
			Please continue on a sepa	arate sheet if necessary
will not represer After this and issues. 8. If you	ion necessary to support/justify the representation at the publication stage. is stage, further submissions will be oues he/she identifies for examination. our representation is seeking a modification part of the examination? (the hear	make furth	request of the Inspector, ba	the original sed on matters
NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the examination	ne oral
	ou wish to participate at the oral part o to be necessary:	f the exar	nination, please outline why	you consider
	note the Inspector will determine the mos d that they wish to participate at the oral		· · · · · · · · · · · · · · · · · · ·	ar those who have

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RO0794





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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: C EDAD IN	First name:
First Name: (FRAR D	Last Name:
Last Name: FENSKIKSEN	, Last Name.
Organisation/company:	Organisation/company:
RETIRED	
Address: 21 WYEDALE HAYDOCK	Address:
STHELENS	Address:
Postcode: WAIIOHY	Postcode:
- All Andrews	Tel No:
	Mobile No:
	Email:
	,
Signature:	Date: 4/3/2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	
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Yes (via email)	☐ No
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3. To which	part of the Local Pla	n does this repre	sentation relate?	
Policy PA 05 iTE	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)		
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Legally Cor	mpliant?		Yes ☐ No D ∈	ort know
Sound?			Yes No	
Complies w	vith the Duty to Cooper	rate	Yes No	
Please tick	as appropriate			
Positively P Justified? Effective?	Prepared? with National Policy?			
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or fails to	to comply with the dutish to support the leg box to set out your of	ity to cooperate. Find the compliance or comments.	cal Plan is not legally co Please be as precise as p soundness of the Local	Plan, please also
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	efe this land from the greenbelt.			removal
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indicated that they wish to participate at the oral part of the examination

Please keep a copy for future reference.

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

1800756M



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

(For official use only)

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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; Mc	Title:
First Name: GERARD	First name:
Last Name: HENORINGEN	Last Name:
RETIRED	Organisation/company:
Address: 21 WYEDALE ROLD	Address:
HANDOCK	
'ST HELENS	
Postcode: WALLOHN	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 4/3/2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
Nould you like to be kept updated of future sta namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	thod of communication. If no email address is provided

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St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

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Policy	Paragraph/	Policies	Sustainability	Habitats
TES EA 661	diagram table	Map	Appraisal/ Strategic Environmental Assessment	Regulations Assessment
Other docum	nents (please name nd relevant part/secti	on)		
	ensider the St Helen d the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Com	pliant?		Yes No Do	off know
Sound?			Yes No	
Complies wit	th the Duty to Coope	rate	Yes No	
Please tick a	s appropriate			
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Consistent w	ith National Policy?			
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fter th	nis stage, further submissions will be o ues he/she identifies for examination.	cation; do you consider it necessary to participate at

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

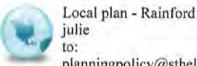
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0795







SITE 8HA (1) - LPAO!

planningpolicy@sthelens.gov.uk 12/03/2019 19:16

2- Para 1.7.

3-8.A.

Dear Sir

I would like to raise some points with regard to the building of a large number of houses on green belt land in Rainford.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

- · the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- · therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8)Rookery Lane)

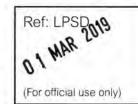
- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the
 agricultural sector which are threatened by the proposed removal of this site from the Green Belt.
 The SHLP is intended to promote employment and economic growth yet this will have the opposite
 effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV)
 Land.

Margaret Julie Henry

RO0796



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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: PAUL WIE	First name:
	Last Name:
Organisation/company:	Organisation/company
Address: 36 GRUM CROSCOWT	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signa	Date: 20 2-19
Please be aware that anonymous forms cannot be considered you MUST include your details above	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? bublication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred me	thod of communication. If no email address is provided,

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3. 10 Which	part of the Local Pla	an does this repre	sentation relate?	
Policy PA Wes	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)		
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Sound?			Yes No	
Complies w	ith the Duty to Cooper	ate	Yes _No	
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally



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

Ref; LPSD

1 MAR 201. (For official use only)

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(we will correspond via your agent)	
	Title:
	First name;
Last Name: HENTHORA	Last Name:
	. Organisation/company:
Address: 36 GIRUAN CRESCENT	Address:
GARSWOOD MR ASHTOD-IN	
MAKORFIED NE WILLY	
	Postcode:
Tel No:	
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Linani	
Signature	Date: 20 - 2 - 2014,
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? olication of the Inspector's recommendations and
Yes (via email)	☐ No
	od of communication. If no email address is provided,

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MILHA	gram	Policies Map	Sustair Apprai Strateg Enviror Assess	sal/ gic nmental	Habitats Regulations Assessment
Other documents (pl document and releva		on)			
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_egally Compliant?			Yes	□ No - O	ont know
Sound?			Yes	No	
Complies with the Di	uty to Cooper	ate	Yes	₩ No	
Please tick as appro	priate				
5. If you consider the Please read the G	uidance note	for explanations of			
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RO0797



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MAR 2019

To Norticial use only)

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(we will correspond via your agent)	Title
Title: M R	Title:
First Name: FRANCIS	First name:
Last Name: サミュイチャン	Last Name:
Organisation/company:	Organisation/company:
Address 36 GIRLAN CRESCENT	Address:
GARSLOOD, NR ASTIN 20-	
MALSORFIND	Postcode:
Postcode: SAU 055	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 20- 2- (9
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Yes (via email)	□ No
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Legally Co	mpliant?		Yes No C	DONE KNOW			
Sound?			Yes No				
Complies	with the Duty to Coope	rate	☐ Yes ☐ No				
Please tick	as appropriate						
5. If you co	onsider the Local Pla ead the Guidance note	n is <u>unsound,</u> is it	because it is not: f the Tests of Soundness				
Positively F	repared?						
Justified?							
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0798



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Yes (Via Email)

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

2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Mobile No:
Email:
Date: 10-3-2019
annot be accepted and that in order for your clude your details above.

No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

PART B - YOUR REPRESENTATION

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

Policy	Paragraph	Policies		Sustainability	Habitats
	/ diagram / table	Мар	918	Appraisal/ Strategic Environmental Assessment	Regulation Assessment
	ments (please nam and relevant n)	ne			
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RO0799



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

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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: MICHAEC.	First name:
Last Name: HENTHORN.	I got Nigree.
Organisation/company:	Organisation/company:
Address: , ELM GARDENS: RAINFORN	Address:
Postcode: WATI8 DX .	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	
	* * * * * * * * * * * * * * * * * * *
Signature	Date: 10/3/2019 ·

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

RETURN DETAILS

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Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

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

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Policy	Paragraph	Policies	Sustainability	Habitats
	/ diagram	Мар	Appraisal/	Regulation
	/ table		Strategic	Assessment
			Environmenta	
Section 1			Assessment	
	ments (please nam	е		
	nd relevant			
part/section)			
4. Do you c	onsider the St Hele	ens Borough Local	Plan 2020-2035 i	s:
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Legally Con	npliant?	Yes 🗆		No 🗆
Sound?		Yes 🗆		No 🖭
	ith the Duty to	Yes 🗆		No 🗆
Cooperate	and transfer to	A		
Please tick as	appropriate			
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7. Please set out what modification(s) you consider necessary to make the Local compliant or sound, having regard to the matter you have identified at 6. above relates to soundness (NB please note that any non-compliance with the duty to incapable of modification at examination). You will need to say why this modification the Local Plan legally compliant or sound. It will be helpful if you are able to put suggested revised wording of any policy or text. Please be as precise as possible any sites that have grade I agriculture we are a small country a if is essentially we are a small country as much as our food as passible. We are constantly infection about our barbon this will only increase the will have to the inport it more.	where this cooperate is ation will make forward your le.
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Please note the Inspector will determine the most appropriate procedure to ad	opt to hear those
who have indicated that they wish to participate at the oral part of the examinat	
Thank you for taking the time to complete and return this response	form.
Please keep a copy for future reference.	14.11

RO0800

27-15 27-15 12-15-15



The Local plan dorothyheron to: planningpolicy

27/02/2019 12:03

To:

dorothyheron < planningpolicy@sthelens.gov.uk

I wish to register my objections to building on eccleston park golf course in Rainhill... This should be kept as green belt land ... Thankyou

Sent from my iPhone

Representor Details

Web Reference Number	WF0401
Type of Submission	Web submission
Full Name	Mrs dorothy heron
Organisation	Mrs
Address	
Agent Details	aorotny neron

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

Yes (via e-mail)

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

The state of the s		
Policy		
Paragraph / diagram / table		
Policies Map	LPA06	
Sustainability Appraisal / Strategic	3HS	
Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Т

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

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

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

Response Date	2/28/2019 4:43:56 PM