



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO1401 – RO1500

SEPTEMBER 2020

RO1401



St Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [Redacted Signature]	Date: 3/5/19
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

Yes ☒ (Via Email)

No ☐

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

RO1402



St. Helens
Council

**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

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>DAVID PAUL</u>	First name:
Last Name: <u>PILLAYANCS</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>13 CORSEY LANE ST. HELENS MERSEYSIDE</u>	Address:
Postcode: <u>W1A 9 1 1 X A</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>11-3-19</u>
-----------------------	----------------------

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

RO1403



St Helens
Council

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

Ref: LPSD

13 MAR 2019
(For official use only)

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

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Rachel	First name:
Last Name: Pickles	Last Name:
Organisation/company: N/a	Organisation/company:
Address: 1 Kendal Drive, Rainhill, Prescot, Merseyside	Address:
Postcode: L35 9JQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

10th March 2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

- Removing 3HS from green belt will negate the purpose of designating this land as green belt in the first place. If this land is removed from green belt and subsequently developed it will create a huge urban sprawl across the areas of Whiston, Eccleston Park, Rainhill, Nutgrove and Thatto Heath. This area of land supports many birds, mammals and plant life including species which are protected. It is a hugely important and vital local resource which should not be given over to development.
- Last year, storms led to severe flooding at Willowbrook Hospice on Portico Lane which resulted in a number of inpatient beds needing to be closed and a reduced capacity for the hospice to care for people who need their services most. Developing the site at 3HS would inevitably affect the ability of the land around it to drain effectively meaning this would no doubt become a much more regular occurrence not only for the hospice but also other property surrounding the site.
- The sites included in the St Helens Brownfield Land Register 2017 have a total number of 5,808 units which would support the council's housing demands for nearly 12 years. However, if housing needs were to be based on the latest figures from the Office for National Statistics the Brownfield register would support housing demands for over 15 years.
- The areas around Whiston, Eccleston Park, Rainhill, Nutgrove and Thatto Heath have already seen multiple sites developed for additional housing. Over the years this has in turn created pressure on availability of school places, Whiston Hospital, doctors and dental surgeries and therefore developing a site as large as 3HS would not be sustainable in terms of local services.

- The local road infrastructure is also a matter of serious concern. The local roads simply could not support the increased traffic that would be generated by developing 3HS for housing. The roads immediately surrounding the site are B and C roads and already struggle to cope with the volumes of traffic using them. Additionally, the A57 (Warrington Road) is the only A road running through Rainhill which again cannot deal with the current volumes of traffic. As a result, road users are increasingly attempting to find alternative routes to avoid using the A57, especially at peak times. This is pushing more traffic on to the surrounding minor roads and through housing estates. The Kendal Drive estate [REDACTED] is one example of this with high levels of traffic 'cutting through' to access Stoney Lane as an alternative route to Warrington Road. The estate is restricted access between 9am and 9pm (so doesn't apply to the morning rush hour) but in any case, is largely ignored by frustrated road users. The issue was further compounded during the recent periods of roadworks at the crossroads with Warrington Road, Longton Lane and Old Lane with large queues forming through the estate.
- Increased traffic through already highly populated residential areas will not only have an impact on pedestrian safety, it will also have a detrimental effect on air quality as a result of more air pollution. Taken in the context that St Helens already has a higher than average number of deaths from respiratory disease compared to the rest of the North West and England as a whole, this is a consequence we can ill afford.

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 abide with the National Planning Policy Framework (2019) and delete 3HS from the proposed removal from green belt.

The council should not in any way be considering removing 3HS from green belt and changing the status to 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

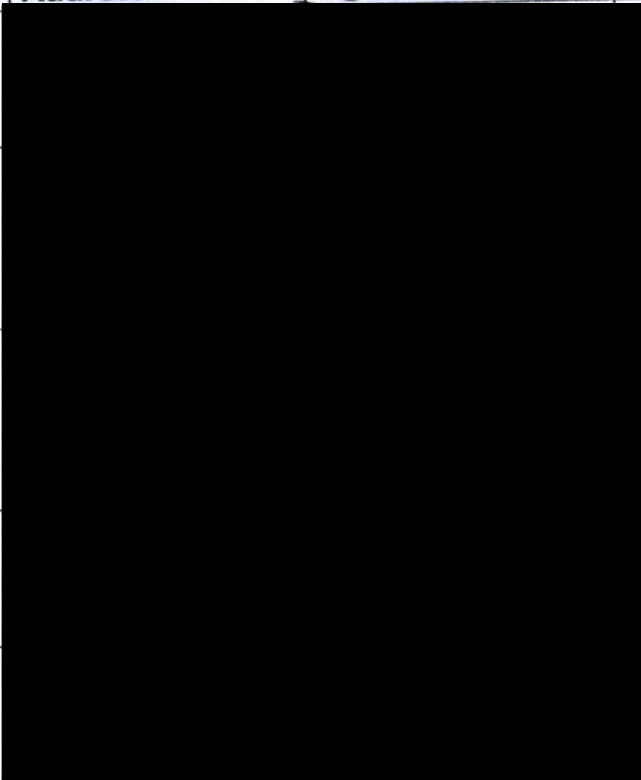
Yes, I wish to participate at the oral examination

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

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

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

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

Name	Address	Signature	Date
Andrew Pickles			10/3/19
Mary Antrobus			10/03/19
Graham Antrobus			10/3/19
Vicki Morgan			10/3/19
Philip Morgan			10/3/19

We have worked together on this response.

RO1404

①-LPA05

PFO066

②-Statement of Common Ground 78

Ref: LPSD



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01 MAR 2019
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Part B - Your Representation(s)

PART A - YOUR DETAILS

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Clifford</u>	First name: _____
Last Name: <u>Pickton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Brookfield Farm</u>	Address: _____
<u>Brookfield Road</u>	_____
<u>Ashton-in-Makerfield Wigan</u>	_____
Postcode: <u>WN4 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>24th FEB 2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No By post please

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPAs Florida Farm South	Site 21A	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - The council should provide strict proof of population estimates. The population of St Helens has been in decline since 1981.</p> <p>Building a greenbelt does not encourage use of urban land. Releasing greenbelt land causes significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because of lack of schools, doctors etc. Access to the site is inadequate. There are existing flooding problems. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal
from the greenbelt

Please continue on a separate sheet if necessary

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

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

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



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

Yes, I wish to participate at the oral
examination

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

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

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

Please keep a copy for future reference.



St. Helens
Council

① - LPA06 PF0075
② - Statement of Common Ground 86

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

Ref: LPSD

01 MAR 2019

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Clifford

Last Name: Purton

Organisation/company: _____

Address: Brookside Farm

Brookside Road

Ashton-in-Makerfield, Wigan

Postcode: WN4 0NL

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

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

☐ Yes (via email)

☒ ~~No~~

By post please

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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3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site 1+15	North of Billing Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified. The council should provide strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of green belt land is to assist in urban regeneration by encouraging the recycling of derelict land and urban land (St Helens has derelict land in abundance). The release of green belt land will cause significant harm to the purpose of the green belt. Housing in this area is not sustainable due to brown fields, Dochas etc. There is no statement of common ground between St Helens & neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt
 Prime importance is to use derelict and Brown-field sites
 Greenbelt land to be used for agriculture

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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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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MAR 2019

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Part B - Your Representation(s)

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Title: <u>Mr. E</u>	Title: _____
First Name: <u>Clifford</u>	First name: _____
Last Name: <u>Pickton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Bracstedes Farm</u>	Address: _____
<u>Bracstedes Road</u>	_____
<u>Aughton - Macclesfield, Wigan</u>	_____
Postcode: <u>WN4 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>23rd FEB 2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ ~~No~~

By Post please

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA05 Site 1HA	South or Billing Road West Smock Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

The Council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the green belt is to assist with urban regeneration by encouraging the recycling of derelict land (of which there is an abundance in St Helens). The release of ^{this} green belt will cause significant harm to the purpose of the green belt. Housing in this area isn't sustainable because there are no schools, doctors etc. Access to the site on roads would be inadequate. There is no statement of common ground with neighbouring authorities.

①
②

Please continue on a separate sheet if necessary

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

Delete this land from the removal of the greenbelt.
There has been notices in supermarkets last week regarding short supply of produce. Where does St Helens council think fresh produce comes from? If there are no imports land of this quality will need to be used to GROW FOOD! for our citizens and this will happen in the near future.

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.

①-LPA04

PF0089

②- Statement of Common Ground 100

St. Helens
Council

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Clifford

Last Name: Pieton

Organisation/company: _____

Address: Brooksteds Farm

Brooksteds Road

Ashton-in-Makerfield Wigan

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

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

☐ Yes (via email)

☒ No

By Post Please

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA04 Site 2EA 5EA	Paragraph/ diagram table 6EA Between + land lined Liverpool Road.	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

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. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in the greenbelt in respect of 2EA Florida Farm North. Risk of flooding further down Clipsley Brook will be exacerbated by this development. Traffic will be a problem. There is no statement of common ground between neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

--

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.

RO1405



St. Helens
Council

① - LPAOS PFO067
② - Statement of Common Ground 79

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

Ref: LPSD

01 MAR 2018

(For official use only)

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www.sthelens.gov.uk/localplan

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

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs.</u>	Title:
First Name: <u>Sheila</u>	First name:
Last Name: <u>Pickton</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>Brookstades Farm</u>	Address:
<u>Brookstades Road, Ashtown</u>
<u>Makerfield, Wigan</u>
Postcode: <u>WN4 5NR</u>	Postcode:
.....	Tel No:
.....	Mobile No:
.....	Email:

Signature:	Date: <u>24th FEB 2019</u>
------------------	---------------------------------------

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

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

☐ Yes (via email)

☒ By Post please

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
Town Hall
Victoria Square
St Helens
WA10 1HP**

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St.Helens Town Hall
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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 Flonds Farm South	SITE 2+1A	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - The council should provide strict proof of population estimates. The population of St Helens has been in decline since 1981. Where are all these extra people coming from? Building in the greenbelt does not encourage the use of urban land. Releasing greenbelt causes significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because of lack of schools, doctors, etc. Access to the site on road is inadequate. There are existing flooding problems. There is no statement of common ground with neighbouring authorities</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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

--

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Please keep a copy for future reference.



St. Helens
Council

① - LPA06

PP0076

② - Statement of Common Ground

BA

Ref: LPSD

MAR 2019
(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Sheila</u>	First name: _____
Last Name: <u>Pickin</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Brooksteds farm</u>	Address: _____
<u>Brooksteds Road</u>	_____
<u>Ashken in - Matherfield, Wigan</u>	_____
Postcode: <u>WN4 0NR</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____
Signature: _____	Date: <u>23rd FEB 2019</u>

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

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

☐ Yes (via email)

☒ No By post

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St Helens
WA10 1HP**

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA 06 Site LHS	North of Billinge Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>Not justified - The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1984. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and urban land using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of the greenbelt. Housing in this area isn't sustainable. Use of cars is being encouraged. There is no statement of commingling with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt:

use all Brownfield and develop land sites before including greenbelt in proposed sites.

Greenbelt should only be considered as a last resort, after all derelict and Brownfield sites have been used.

Greenbelt should remain untouched and prime use for agriculture

Please continue on a separate sheet if necessary

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

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

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St. Helens
Council

①-LPA05 PF0086
②-Statement of Common Ground

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01 MAR 2019
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PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Shaila

Last Name: Pictan

Organisation/company: _____

Address: Braxstede Farm

Braxstedes Road

Ashton in Makerfield, Wigan

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

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

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

Policy LPA05 Site 1HA	South of Billing Road West of Green Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from. One of the purposes of the greenbelt is to assist with urban regeneration by encouraging the recycling of urban and derelict land. Using greenbelt land fails to encourage this. The release of greenbelt land will cause significant harm to the purpose of greenbelt. Housing in this area isn't sustainable because of lack of schools, road access to the site would be inadequate, doctors and other facilities. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete This land from the removal of the greenbelt
All Brown field and derelict sites must be used before
any greenbelt sites are considered as a last resort.
Greenbelt land should be kept untouched and
its prime use should be for agriculture

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

Please keep a copy for future reference.



St. Helens
Council

① - LPA04 PFO090
② - Statement of Common Ground

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Sheila</u>	First name: _____
Last Name: <u>Pickton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Barstodes Farm</u>	Address: _____
<u>Barstodes Road</u>	_____
<u>Ashton-in-Makerfield</u>	_____
Postcode: <u>W14 0NR</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>24th FEB 2019</u>
------------------	----------------------------

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

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

☐ Yes (via email)



By Post please

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA04 site ZEA 6EA SEA	Betsey Hanger Lane Liverson Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

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. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in respect of ZEA Florida Farm North - why do they need further land. Risk of flooding further down Clispen Brook will be exacerbated by this development. Traffic will cause huge problems. There is no statement of common ground between neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delocate this land from the proposed removed from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

--

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

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

Please keep a copy for future reference.

RO1406



St. Helens
Council

① - LPAOS PF0069
② - Statement of Common Ground 81

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

Ref: LPSD

01 MAR 2018

(For official use only)

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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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title:
First Name: <u>Vandy</u>	First name:
Last Name: <u>Pickin</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>Low Brooks Farm Bungalow</u> <u>Brookside Road, Ashton-in-</u> <u>Makerfield, Wigan</u>	Address:
Postcode: <u>WNK 0TT</u>	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>24th FEB 2019</u>
------------------	----------------------------

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

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

☐ Yes (via email)

☒ By Post please

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LP105 Floods Farm Sewer	Site ZHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - The Council should provide strict proof of population estimates. The population of St. Helens has been in decline since 1981. Building a greenbelt does not encourage the use of urban land. Releasing greenbelt land causes significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because of lack of schools, doctors etc. Access to the site is inadequate. There are existing flooding problems. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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.

① - LPA06 PF0078
② - Statement of Common Ground

Ref: LPSD

01 MAR 2019

(For official use only)



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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS


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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Wendy</u>	First name: _____
Last Name: <u>Pickin</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Low Brooks Farm Bungalow</u> <u>Brookside Road, Ashton-in-</u> <u>Makerfield, Wigan.</u>	Address: _____
Postcode: <u>WN4 8JJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____
Signature: 	Date: <u>24th FEB 2019</u>

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

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

☐ Yes (via email)

☒  By Post please.

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

RETURN DETAILS

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

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

or by hand delivery to:

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

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

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 Site 1+15	North of Billing Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Where are all these extra people coming from? One of the purposes of the greenbelt is to assist urban regeneration by encouraging the recycling of derelict and urban land. Using greenbelt fails to encourage this. The release of greenbelt land will cause significant harm to the purpose of greenbelt. Housing here is unsustainable. Use of car is being encouraged. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.
 All Brownfield and derelict sites to be used before any greenbelt is considered, as a last resort.

Please continue on a separate sheet if necessary

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

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

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

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

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

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Please keep a copy for future reference.



St. Helens
Council

① - LPAOS PFO087
② - Statement of Common Ground

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

Ref: LPSD

01 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Miss

First Name: Wendy

Last Name: Pickton

Organisation/company: _____

Address: Brookstades Farm

Brookstades Road, Ashton-

in-Makerfield, Wigan.

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 23rd FEB 2019

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

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

☐ Yes (via email)

☒ No By Post please.

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
Town Hall
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St Helens
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or by hand delivery to:

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St.Helens Town Hall
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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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setting out your representation/comment.**

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA05 Site IHA	South of Billings Road West of small lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981 - where are all these extra people coming from? One of the purposes of the greenbelt is to assist with urban regeneration by encouraging the recycling of derelict land (of which there is an abundance in St Helens). The release of this greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area isn't sustainable because there are no schools, doctors etc. Access to the site on these roads would be inadequate. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the removal of The greenbelt
Where does St Helens Council think fresh produce
will appear from during a crisis? Difficulty with
Imports will cause a need to grow our own food
on a larger scale. This is prime growing land

Please continue on a separate sheet if necessary

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

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.



① - LPA04 PFO092
② - Statement of Common Ground 103

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Wendy</u>	First name: _____
Last Name: <u>Puckett</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Low Brooks Farm Bungalow</u> <u>Bracestades Road, Ashton-in-</u> <u>Makinsfield, Wigan.</u>	Address: _____
Postcode: <u>WN4 0NL</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>24th FEB 2019</u>
------------------	---------------------------------------

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

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

☐ Yes (via email)

☒ ~~No~~

By Post Please

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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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.

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

Policy LPA04 SITE 2EA, SEA 6EA	Between hardcore line & water road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified - The council should be put to proof of the need for this type of development in this position and this scale. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in respect of 2EA - Florida Farm North - why do they need further land. Risk of Flooding down Clipsley Brook will be exacerbated by this development. Traffic will cause problems. There is no statement of common ground between neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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--	--

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

Please keep a copy for future reference.

RO1407



St. Helens
Council

①-LPA05

PFO070

②-Statement of Common Ground

82

Ref: LPSD

01 MAR 2018

(For official use only)

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

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

01 MAR 2019

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

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Simon

Last Name: Pickton

Organisation/company: _____

Address: Brooksheds farm

Brooksheds Road, Ashton -

in-Makerfield, Wigan

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 24th FEB 2019

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

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

☐ Yes (via email)

☒ By Post please

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RETURN DETAILS

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

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPAS Flooding Farm South	Site 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified - The council should provide strict proof of population estimates. The population of St Helens has declined since 1981. Building in the greenbelt does not encourage the use of urban land. Releasing greenbelt land causes significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because of lack of schools, doctors etc. Access to this site is not adequate. There are existing flooding problems. There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

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

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

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

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St. Helens
Council

① - LPA06 PFO079
② - Statement of Common Ground 10

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

Ref: LPSD

01 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Simon

Last Name: Pickton

Organisation/company: _____

Address: Bracstedes Farm

Bracstedes Road, Ashton-in-

-Makerfield, Wigan

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 24th Feb 2019

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

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

☐ Yes (via email)

☒ No

By Post please

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
Town Hall
Victoria Square
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WA10 1HP**

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA06 Site ITS	North of Billinge Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified. The council should be put to strict proof of its population estimates. The population of St. Helens has declined 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 land and other urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of greenbelt. Housing in this area is unsustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt.

There are couple Broadland and derelict sites in St Helens which should be used first and greenbelt should be a very last resort

Greenbelt should have a primary use of growing for agriculture and sustaining green land

Please continue on a separate sheet if necessary

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

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

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--

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St. Helens
Council

①-LPA05

Pf0088

②-Statement of Common Ground

119

Ref: LPSD

01 MAR 2019
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1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Simon

Last Name: Pickton

Organisation/company: _____

Address: Brookside Farm

Brookside Road, Ashton-

in-Makerfield, Wigan.

Postcode: WN4 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 23rd FEB 2019

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

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

☐ Yes (via email)



By Post please

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

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

Policy LPA05 Site IHA	South of Bulmer Road West of Smock Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981 - where are all these extra people coming from? One of the purposes of the greenbelt is to assist with urban regeneration by encouraging recycling of derelict land (for which there is an abundance in St Helens). The release of ^{this} greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because there are no schools, doctors etc. Access to the site on these roads would be inadequate. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the removal of the greenbelt.
This land should be kept as greenbelt and
marked as agricultural land that will be needed
during an import crisis. Notices have been up in
Sainsbury's this last week regarding difficulty in
getting fresh produce most of which is imported.
We need greenbelt land like this to feed the citizens.

Please continue on a separate sheet if necessary

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

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

① - LPA04

PF0093

② - Statement of Common Ground

104

Ref: LPSD

1 MAR 2019

(For official use only)



St. Helens
Council

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr. Simon

First Name: Peter Simon

Last Name: Pickton

Organisation/company: _____

Address: Brookside Farm

Brookside Road

Ashton-in-Makerfield, Wigan.

Postcode: WN1 0NR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 21 FEB 2019

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

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

☐ Yes (via email)

☒ No

By Post please

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy LPA04 Site ZEA SEA SEA	Behman Hardec Lew Lew Lew Lew	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified - The council should be put to proof of the need for this type of development in this position on this scale. The release of green belt will cause significant harm to the purpose of the green belt. The council has already gained planning permission in respect of ZEA - Florida Farm North - why do they need further land? Risk of flooding down Clipley Brook will be exacerbated by this development. Traffic will cause problems. There is no statement of common ground between neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

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

Delete This land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

Please keep a copy for future reference.

RO1408



St. Helens
Council

(4114)

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

Ref: LPSD

12 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>DOROTHY</u>	First name:
Last Name: <u>PIERCE</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>18 WALMESLEY RD</u>	Address:
<u>ECCLESTON</u>
<u>ST HELENS</u>
Postcode: <u>WA10 5JX</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: <u>12-3-2019</u>
-----------------------	------------------------

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

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified? NOT JUSTIFIED	<input type="checkbox"/> FLAWED METHODOLOGY
Effective? NO	<input type="checkbox"/> NOT DELIVERABLE
Consistent with National Policy? NO	<input type="checkbox"/> DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ul style="list-style-type: none"> • DOES NOT SATISFY REQUIREMENT FOR SUSTAINABLE DEVELOPMENT • DOES NOT MEET CRITERIA FOR SUSTAINABLE TRANSPORT • HOUSING TARGETS BASED ON ASPIRATIONAL GROWTH PREDICTIONS • ONCE THE GREEN BELT IS SAFEGUARDED, IT WILL DISAPPEAR FOR EVER WITH CONCOMITANT LOSS OF WILDLIFE HABITATS. NO REFERENCE MADE TO ENVIRONMENTAL DEGRADATION • GREEN SPACE DEVELOPMENT HAS BEEN FAVOURED OVER TOWN CENTRE DEVELOPMENT • NO REFERENCE MADE TO THE LOSS OF HIGH QUALITY AGRICULTURAL LAND • NO REFERENCE / EFFECTIVE PROPOSAL FOR WATER SUPPLY TO PROPERTIES ON WEST OF TOWN CENTRE.

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.

- COUNCIL NEEDS TO USE STANDARD METHODOLOGY OR MAKE CASE FOR EXCEPTIONAL CIRCUMSTANCES IN RESPECT OF HOUSING NEED.
- COUNCIL NEEDS TO USE NEWONS (2016) FORECAST FOR HOUSING NEED.
- NEEDS TO MENTION BROWN FIELD + PDL NOT YET ON BROWN FIELD REGISTER
- THE TOWN HAS 3,170 HA OF CONTAMINATED LAND WHICH COULD BE REDEVELOPED. THERE IS NO NEED TO SAFEGUARD AN AREA OF GREEN BELT EQUIVALENT TO 70% OF THIS LAND. SOME OF THESE SITES COULD BE MADE AVAILABLE BY 2035-50 - COUNCILS NEED TO DRAW UP A POLICY.
- PROPER CONSIDERATION NEEDS TO BE GIVEN TO LOSS OF GRADE 1 + 2 AGRICULTURAL LAND AND EFFECTS ON WILDLIFE + PUBLIC HEALTH.
- COUNCIL NEEDS TO DRAW UP AN EFFECTIVE PLAN TO MANAGE TRAFFIC CONGESTION ALREADY OBSERVABLE AROUND PROPOSED DEVELOPMENT SITES, PARTICULARLY BHS.
- COUNCIL NEEDS TO ADDRESS IMPACT ON HEALTHCARE + EDUCATION
PRIMARY SCHOOLS ARE ALREADY OVERSUBSCRIBED

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.

RO1409



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

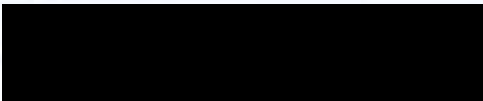
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANDREW	First name:
Last Name: PIERT	Last Name:
Organisation/company:	Organisation/company:
Address: 226 FLEET LANE Barr	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

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

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

Yes ☐ (Via Email)

No ☐

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

RO1410



St. Helens
Council

①-LPA05

PF0362

②-IDP

397

362

Ref: LPSD

11 MAR 2019

(For official use only)

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Gillian

Last Name: PILKINGTON

Organisation/company:

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: Date: 4th March 2019

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
BHS - LAND SOUTH OF A580 BETWEEN HOUGHTONS LANE AND CRANTOCK GROVE, WINDLE							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> THE PLAN IS BASED ON FLAWED METHODOLOGY
Effective?	<input checked="" type="checkbox"/> THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> IT DOES NOT COMPLY WITH NPPF 2015

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

ECONOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON FLAWED HISTORICAL DATA. THE HOUSING NEEDS ASSESSMENT DOES NOT USE STANDARD METHODOLOGY. THE LATEST ASSESSMENT PRODUCED BY ONS (2016) PREDICTS THAT 383 HOUSES PER YEAR WILL BE REQUIRED IN ST. HELENS. THE COUNCIL ARE USING A 2014 FORECAST OF 486. THE PLAN MAKES NO MENTION OF BROWNFIELD AND PREVIOUSLY DEVELOPED LAND NOT INCLUDED ON THE BROWNFIELD REGISTER. THE ST. HELENS COUNCIL CONTAMINATED LAND STATEMENT (2015) INDICATES 3170HA OF THE LOWEST PRIORITY CONTAMINATED LAND EXISTS, IF THIS WERE REMEDIATED THERE WOULD BE NO NEED TO RELEASE TWO GREEN BELT SITES OF 56.6HA AND 148HA AS SAFEGUARDED FOR BUILDING. THE LOSS OF GRADE 1 AND GRADE 2 AGRICULTURAL LAND WILL HAVE A NEGATIVE IMPACT ON FARMING AND DISTRIBUTION JOBS. THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC GROWTH THAT WILL NOT SATISFY THE NPPF (2016) AND WILL HAVE A SIGNIFICANT IMPACT ON AIR-QUALITY, NOISE, TRANQUILITY AND GENERAL HEALTH. THE IDP FAILS TO EXPLAIN THE IMPACT ON HEALTHCARE AND EDUCATION.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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.

RO1411



St. Helens
Council

Barbara Pilkington (337)

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

Ref: LPSD

87 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>BARBARA</u>	First name: _____
Last Name: <u>PILKINGTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>318, LIVERPOOL RD</u> <u>PREWALL</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA11 9RY</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>5/3/19</u>
-----------------------	---------------------

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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

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

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

Barbara Turington

PART B - YOUR REPRESENTATION

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

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

Policy LPA 05 SME 2HA	①	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

① Why 520 houses on Greenfield land - with so many unused brownfield available? Not sufficient room for a car park going access to properties - Probably 1000 more plus cars on roads which are already congested. Schools and surgeries already over-subscribed. Liverpool Rd already busy day and night with noise and pollution. Flooding can also be a right-mate down in the basin leading to Blackbrook. The consideration whatsoever given to local residents from a very selfish Council.

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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.

Barbara Pilkington

PART B - YOUR REPRESENTATION

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

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

Policy LPA OK SITES 2EA 8EA 6EA	<u>1</u>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified should prove of a need of this type of development in this position and on this scale. Nightmare already with the development excess traffic, noise and bright lights at peak times it is difficult enough to get access to our homes. No consideration whatsoever to people having to live so near to all this. Constant noise from lorries 24 hours a day

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

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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

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

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

--

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

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

Please keep a copy for future reference.

RO1412

CARL PILKINGTON

338

Ref: LPSD

07 MAR 2019

(For official use only)

St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Carl</u>	First name: _____
Last Name: <u>Pilkington</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>315 Liverpool Rd Preston St Helens</u>	Address: _____
Postcode: <u>WA11 9RY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>5-3-19</u>
------------------------------	---------------------

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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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 Plan does this representation relate?							
Policy <i>LPA 05 SPE 24A</i>	<i>1</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>Proof of necessity for this type of development on this huge scale. Considering how you have blighted the area already. There will be congestion on the roads on a grand scale ^{scale}. Living here will be become a nightmare. No peace whatsoever for residents. Ruined peoples lives with fumes noise - never ending traffic why have we have been become Selfish St Helens Council</i></p> <p><i>TARGET</i></p>	

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

Delete this land from the proposed removal from the Green Belt

Please continue on a separate sheet if necessary

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

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



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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA 04 S105 16A 8EA 6EA	<u>2</u>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>2</u></p> <ol style="list-style-type: none"> 1. Can you prove we need 520 new houses when St Helens population is in decline 2. Positioning for entrance to site completely ridiculous & will cause unbelievable congestion on an already very congested Liverpool Rd. 3. Schools doctors are already choked to capacity 4. Another possible cars on peak times (100) (unbelievable) 5. <u>PLEASE</u> take all this into consideration. 	

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 proposal from the Green Belt

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

Please keep a copy for future reference.

RO1413

13, Park Road North,
Newton-le-Willows.
Merseyside
WA12 9TF.

30 APR 2019

The Officer in Charge,
Local Plan,
St Helens MBC
WA10 1HP.

888

Dear Sir/Madam,

St. Helens Borough Local Plan

I wish to object to
the proposed removal of He Parkside East
area from the green belt. This is largely
good quality, highly productive arable land.
As the population grows there is an
increasing need for Britain to produce
its own food, particularly if we leave
the European Union. It would therefore

be folly to concrete over this land
and put it to something other than
agricultural use.

Yours faithfully,

David H. Pitt.

RO1414



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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>THOMAS</u>	First name: _____
Last Name: <u>PIMBLETT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>147 BLEAK HILL RD</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DW</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>9/3/2019</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☐ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - BASED ON "FLAWED METHODOLOGY"
Effective?	<input checked="" type="checkbox"/> NO - PLAN IS NOT DELIVERABLE.
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - DOES NOT COMPLY WITH NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ul style="list-style-type: none"> PROMOTES USE OF HGV'S IN RESIDENTIAL AREA'S ; ON ROADS THAT ARE NOT SUITABLE. IGNORES AGRICULTURAL LAND QUALITY. IGNORES AIR QUALITY / NOISE / GENERAL HEALTH ISSUES. MAJOR TRANSPORT ROADS AND RESIDENTIAL AREAS WILL NEVER BE WITHOUT SERIOUS PROBLEMS IF THE ROADS ARE PASSING THROUGH THE RESIDENTIAL AREAS.

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

Please continue on a separate sheet if necessary

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

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

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

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

Please keep a copy for future reference.

RO1415



① - LPA06 PFD074

② - Statement of Common Ground

Ref: LPSD

01 MAR 2019
(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Herbert

Last Name: Pimblett

Organisation/company: _____

Address: 49 Ashton Road

Golborne

Warrington, Cheshire

Postcode: WA3 3UU

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
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or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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 Site IHS	North of Billing Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

Not justified. The Council should provide strict proof of its population estimates. The population of St Helens has declined since 1981 where are all these extra people coming from. One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of ~~derelict~~ ^{derelict} and urban land. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable due to lack of schools, doctors etc. There is no statement of common ground between St Helens & neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the greenbelt.
Brownfield and derelict sites to be used first

Please continue on a separate sheet if necessary

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

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

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

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

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

--

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

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

Please keep a copy for future reference.



① - LPA05 PFO084
② - Statement of Common Ground

Ref: LPSD

01 MAR 2019

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title:
First Name: <u>Herbert</u>	First name:
Last Name: <u>Pimblett</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>49, Ashton Road</u> <u>Colborne, Warrington</u> <u>Cheshire</u>	Address:
Postcode: <u>WA3 3UU</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:	Date: <u>23rd FEB 2019</u>
------------------	----------------------------

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

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

☒ Yes (via email)

☐ No

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RETURN DETAILS

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

post to:

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

or by hand delivery to:

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setting out your representation/comment.**

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA05 Site I HA	South of Billing Rd West do Small Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

The council should be put to strict proof of its population estimate. The population of St Helens has declined since 1981. Where are all these extra people coming from. One of the purposes of the greenbelt is to assist with ^{urban} regeneration by encouraging the recycling of derelict and urban land (of which there is an abundance in St Helens). The release of this greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because there are no schools, doctors etc. Access to the site on A5 roads would be inadequate. There is no statement of commingling with neighbouring authorities.

Please continue on a separate sheet if necessary

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

Delete this land from the removal of the greenbelt
Due to import crisis of Fresh produce, as reported recently on BBC T.V. - greenbelt land must be maintained as greenbelt, as we need to grow our own locally produced food

Please continue on a separate sheet if necessary

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

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

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

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

--

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

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

Please keep a copy for future reference.

RO1416



Representation on St.Helens Local Plan - Submission Version
Gillian Pinder
to:
planningpolicy@sthelens.gov.uk
08/03/2019 15:15



1 Attachment



Rainhill Parish Council representation.docx

Hi,
Please find attached representation on Local Plan from Rainhill Parish Council.

Regards
Gillian Pinder
Clerk to Rainhill Parish Council

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

8th March 2019

Dear Sirs,

St Helens Borough Local Plan 2020-2035 - Submission Draft

The following comments are made in response to consultation on the St Helens Borough Local Plan 2020-2035 - Submission Draft on behalf of Rainhill Parish Council.

Policy LPA06: Safeguarded Land proposes to safeguard site 3HS Former Eccleston Park Golf Club, Rainhill Road, Eccleston for future housing development.

Whilst the Parish Council appreciates that no development is proposed on the site prior to 2035, should the site be considered for future development the Parish Council wishes to place on record that it shares residents' concerns that future development would:

- i. 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;
- ii. Have a detrimental effect on highway safety, for vehicles and pedestrians alike;
- iii. Increase the pressure on schools and nurseries, which are already over-subscribed;
- iv. Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;
- v. Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- vi. Be detrimental to residential amenity, due to the loss of Green Belt.

Unless the above concerns can be addressed the Parish Council consider policy LPA06 to be unsound as future development on this site would not adequately address the needs of the area and would not constitute sustainable development.

Yours faithfully,

Gillian Pinder
Clerk to Rainhill Parish Council

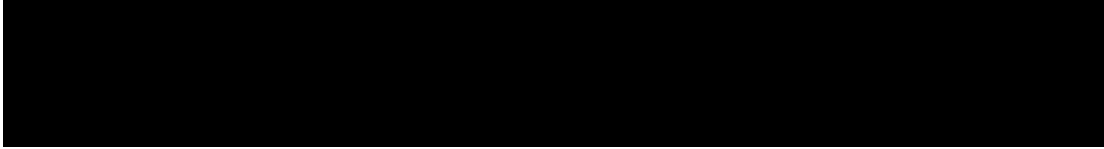


Awarded for excellence

Serving the Rainhill Community since 1894



Representation on St.Helens Local Plan.
Gillian Pinder
to:
planningpolicy@sthelens.gov.uk
12/05/2019 16:14



1 Attachment



Rainhill Parish Council May representation.docx

Dear Sirs,

I attach comments from Rainhill Parish Council. I would be grateful if you could acknowledge receipt.

Regards

Gillian Pinder

Clerk to Rainhill Parish Council

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

11th May 2019

Dear Sirs,

St Helens Borough Local Plan 2020-2035 - Submission Draft.

The following comments are made in response to consultation on the St Helens Borough Local Plan 2020-2035 - Submission Draft, on behalf of the newly elected (May 2019) Rainhill Parish Council.

As a Parish Council we are completely opposed to ANY development of greenbelt in Rainhill and throughout St Helens. We believe that St Helens Council should practice its policy of 'brownfield development first', before any greenbelt is considered for development.

The remainder of this objection relates specifically to a site that development of which, we believe, would have significant negative consequences for the Parish of Rainhill and its residents.

Policy LPA06: Proposal to safeguard site 3HS, Eccleston Park Golf Club, Rainhill Road, for future housing development.

As a newly elected Parish Council, we have been liaising with many Rainhill residents on the issues that concern them, and potential greenbelt destruction within Rainhill and along its boundaries is one of their biggest worries. We share those residents' concerns. We therefore object in the strongest possible terms to the plans to remove Eccleston Park Golf Club from the greenbelt to enable development at a later stage, under the misleading guise of 'safeguarding'. We request that this site is removed from the Safeguarding list and retains its greenbelt status, which offers the statutory protection that the site requires.

Rainhill Parish Council wishes to place on record that it shares residents' concerns, and we object due to the following reasons:

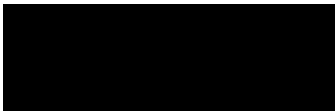
1. Development would lead to additional traffic congestion on roads that are already nearing their safe capacity. Council officers have themselves declared at the Local Plan Roadshow that both the Skew Bridge (Warrington Rd/Rainhill Rd) and the Prescot Rd/Portico Lane junction are at capacity, with major works required to sanction further traffic flow. The Skew Bridge itself is grade 2 listed and it as an internationally renowned structure that needs protection and preservation;
2. Recent roadworks around Rainhill, which increased traffic flow substantially, gave an insight into the detrimental effect on highway safety, for vehicles and pedestrians alike, with regular gridlock and an increase in road traffic accidents;

3. There is an outstanding objection from statutory consultee Sport England over the removal of EPGC as a golf club facility. Any objection from a statutory consultee must be completely resolved before any changes could be made;
4. To prevent urban sprawl between Rainhill and Whiston, Eccleston Park, Nutgrove and Thatto Heath, that would become huge urban conurbation, should development be approved;
5. Increase the existing pressures on schools and nurseries, which are already over-subscribed;
6. Increase the existing pressures on social infrastructure e.g. doctors surgeries, dentists and A&E;
7. The Golf Course site acts as a lung to help clear up the ever increasing and unsatisfactory levels of air pollution that is prevalent throughout St Helens and which is exacerbating health problems for residents;
8. The site itself is home to a vast array of wildlife, fauna and flora;
9. The loss of such an amenity, due to its early mothballing by the owners/developers has already had a detrimental impact throughout Rainhill, St Helens and the wider area. Jobs have been lost, seniors and childrens competitions removed, function rooms defunct, all of which served the local community. These facilities could easily be returned to the benefit of residents should the site remain greenbelt.

Rainhill Parish Council consider policy LPA06 to be unsound as a 'safeguarded site' for future development. As such we request that the site is removed at the earliest opportunity from the Local Plan and retains its greenbelt status. Once built on it cannot be undone. We have a moral responsibility to our residents and to future generations to protect this land from development.

Rainhill Parish Council would welcome the opportunity to meet with the Inspectors on any visit to explain further why we strongly believe that the land should remain as greenbelt.

Yours faithfully,



Gillian Pinder
Clerk to Rainhill Parish Council



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RO1417

353



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

Ref: LPSD

08 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

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Title: <u>MR</u>	Title: _____
First Name: <u>KENNETH</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GRAVE</u> <u>GARDWOOD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0RJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>23 Feb 2019</u>
------------------	--------------------------

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

☒ Yes (via email)

☐ No

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

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

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>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 the extra people coming from?</p> <p>Development will only contribute to an ever decreasing land availability to feed an ever increasing population. continued ~</p>

Please continue on a separate sheet if necessary

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

Delete this land from the proposed
removal from the Greenbelt

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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Section 6 continued...

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

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

Housing in this area is not sustainable because of the lack of school places, doctor surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities

354



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

Ref: LPSD

08 MAR 2019
(For official use only)

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First Name: <u>KENNETH</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>NIA</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GRANGE</u>	Address: _____
<u>GARWOOD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0RT</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>23 Feb 2019</u>
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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)									

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Please continue on a separate sheet if necessary

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

1800756M

Kenneth A Ping, 6 Elstead Grove, Garswood, Wigan, WN4 0RJ

Policy LPA05: Site 2HA

Section 6 continued...

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

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

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

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

There are existing flooding problems at this site, with any remedies to prevent these placing even greater amounts of water into the Clipsley Brook.

There is no statement of common ground with neighbouring authorities.

355



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

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08 MAR 2019
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Address: <u>6 ELSTED GAZE</u> <u>GARSWOOD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0RT</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>23 Feb 2019</u>
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Policy	LPA SITES 2EA SEA LEA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>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.</p> <p>More development reduces land available to grow food.</p> <p style="text-align: right;">continued -</p>
--

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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Please keep a copy for future reference.

Kenneth A Ping, 6 Elstead Grove, Garswood, Wigan, WN4 0RJ

Policy LPA04: Site 2EA, 5EA and 6EA

Section 6 continued...

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

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

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Ref: LPSD

08 MAR 2019
(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>KENNETH</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GROVE</u> <u>GARSWOOD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0RT</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>23 Feb 2019</u>
-----------------------	--------------------------

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

☒ Yes (via email)

☐ No

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

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

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WA10 1HP**

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA06 SITE 145	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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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.

Delete this land from the ^{proposed} removal of the Greenbelt

Please continue on a separate sheet if necessary

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

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

--

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

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Section 6 continued...

and other urban land. Using Greenbelt fails to encourage this.

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

Housing in this area is not sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities

There is no statement of common ground with neighbouring authorities

Development will only accelerate the ever decreasing amount of land available to help feed an ever increasing population.

RO1418

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08 MAR 2019

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Title: <u>MRS</u>	Title: _____
First Name: <u>GILLIAN</u>	First name: _____
Last Name: <u>PING</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>6 ELSTEAD GROVE</u> <u>GARSWOOD</u> <u>WILGAN</u>	Address: _____
Postcode: <u>WN4 0RJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>5th March 2019</u>
------------------	-----------------------------

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

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

Please tick as appropriate

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

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This parcel of Greenbelt land should be ~~removed~~^{deleted} from the Proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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--

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(CONT).

- The infrastructure in the village already struggles to sustain adequate school places, doctors/medical facilities. A big increase in population would lead to even more demand.
- Lack of facilities would mean encouraging more use of cars, as would the poor public transport the village already suffers from. Our roads are only suitable for the local traffic we already generate, we need to keep our children safe from traffic - this is a rural area.
- There is inadequate access to the proposed site from Billinge Road/Keyland Green Road & Garswood Road.
- There is no statement of common ground with neighbouring authorities.

358



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

Ref: LPSD

08 MAR 2019

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Address: <u>6 ELSTEAD GROVE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0RJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>5th March 2019</u>
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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't Know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

- Not justifiable on grounds of increasing population estimates. These have not been proved, in fact the population of St Helens has been on the decline since 1981.
- Derelict & brownfield sites should be prioritised for houses, to regenerate the town, rather than robbing the Greenbelt & allowing villages to sprawl. Loss of our Greenbelt cannot be recovered, and it is good for the country to grow more of its own food crops.
- The infrastructure in the village struggles to sustain adequate school places, doctors' surgeries etc. Buses & trains are infrequent so there will be more traffic on our roads which are only suitable for local use, not commuting routes. The lack of facilities in the village will only encourage the use of more cars - we need to keep our children safe from traffic in this rural area.

Please continue on a separate sheet if necessary

CONTINUED →

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Delete this parcel of land from the proposed removal from the Greenbelt

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

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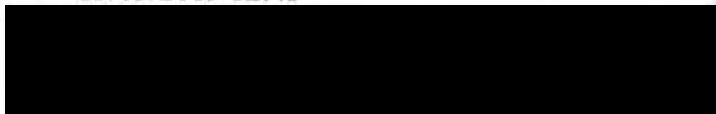
· (CONT.)

- There is inadequate access to the site from Snook Lane/ Billinge Road/Grauswood Road. The tax-payer should not have to pay for any road improvements that ~~might~~^{will} be needed, add it to the developer's expenditure.
- There is no statement of common ground with neighbouring authorities.

RO1419



Local plan
Harry Platt
to:
planningpolicy
13/03/2019 12:43



I have some points to make about the St. Helens local plan:

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

01

Rainford Specific points (8HA Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 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.

02

Regards
Harry Platt

111 Bushey Lane,
Rainford,
St helens,
WA11 7TE

RO1420



St. Helens
Council

① - LPA05
② - LPA06
③ - IDP

④ - Para 1.7.2 OTC

13 MAR 2019

Ref: LPSD

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Neil	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address:
Postcode: WA10 6HJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 12/03/19
------------	----------------

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Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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FURTHER INFORMATION

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

NEXT STEPS

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

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

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>I believe that this version does not satisfy: • the requirement for Sustainable development • the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with higher densities. • food security by ignoring Agricultural Land Quality.</p> <p>In addition, the following fundamental elements of the Plan remain questionable - • Economic growth</p>

predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. • Adequate regional and cross border collaboration has not been undertaken. • The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. • The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. •

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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Please keep a copy for future reference.**

RO1421



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Clare	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address: Postcode:
Postcode: WA10 6HJ	
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.3.2019

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)						

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No- it does not comply with NPPF 2018

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

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

I believe that this version does not satisfy: • the requirement for Sustainable development • the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with higher densities. • food security by ignoring Agricultural Land Quality. In addition, the following fundamental elements of the Plan remain questionable - • Economic growth

①

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Please continue on a separate sheet if necessary

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

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:

1. The first part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

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.**

RO1422



St Helens
Council

765
13 MAR 2019

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

Ref: LPSD

(For official use only)

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

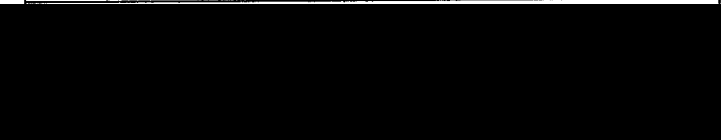
This form has two parts;

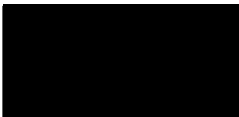
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Alexander	First name:
Last Name: Platt	Last Name:
Organisation/company:	Organisation/company:
Address: 32 Rutherford Road Windle St Helens Merseyside	Address: Postcode:
Postcode:WA10 6HJ	
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: 12-3-19
--	---------------

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

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

Yes x ☐ (Via Email)

No ☐

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

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

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

Please tick as appropriate

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

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>I believe that this version does not satisfy: • the requirement for Sustainable development • the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. • sustainable housing, targets proposed are based on aspirational employment growth predictions. • effective land use by concentrating on Green Space development over town centre development with higher densities. • food security by ignoring Agricultural Land Quality.</p> <p>In addition, the following fundamental elements of the Plan remain questionable - • Economic growth</p>

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Please continue on a separate sheet if necessary

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

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

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:

The following information was obtained from the review:

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.**

RO1423



St Helens
Council

881

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

Ref: LPSD

24 APR 2019

(For official use only)

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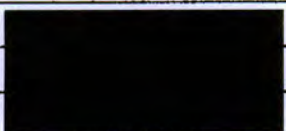
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SANDRA	First name:
Last Name: PLATT	Last Name:
Organisation/company:	Organisation/company:
Address: 571 GARSWOOD RD GARSWOOD	Address:
Postcode: WN4 0XH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 6-4-19
--	---------------------

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

Yes ☒ (Via Email)

No ☐

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

Policy LPA05	Paragraph / diagram / table	Policies Map 1HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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

any 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.

411

20A92

Please continue on a separate sheet if necessary

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP AD6				HS					
Other documents (please name document and relevant part/section)				2					

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

Please tick as appropriate

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

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

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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/S This will need to be factored in to the cost of building the estate.

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

241

20421

Please continue on a separate sheet if necessary

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

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Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

RO1424



448

12 MAR 2019

Ref: LPSD

(For official use only)

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>RENA</u>	First name: _____
Last Name: <u>PODESTA</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 MANOR CLOSE</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SB</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10.3.19.</u>
------------------	-----------------------

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

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

☐ Yes (via email)

☒ No

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

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

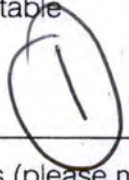
Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

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

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

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



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

Yes, I wish to participate at the oral
examination

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

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. 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)
 - c. 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.

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

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

Please tick as appropriate

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

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

See separate sheet attached

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
removed from the Green Belt.

Please continue on a separate sheet if necessary

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

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



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

Yes, I wish to participate at the oral
examination

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

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. 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 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?

RO1425



St. Helens
Council

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

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>PODESTA</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 MANOR CLOSE</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0SB</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10-3-19</u>
------------------	----------------------

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

☐ Yes (via email)

☒ No

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

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

See separate sheet attached.

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Delete this land from the proposed removal from the Green Belt.

Please continue on a separate sheet if necessary

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

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

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

✓

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1

1. Greenbelt land should only be released in exceptional circumstances.
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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)
 - c. 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.

3. To which part of the Local Plan does this representation relate?									
Policy	PA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

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

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

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

See separate sheet attached

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
removed from the Green Belt

Please continue on a separate sheet if necessary

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

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

✓

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. 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.
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 - 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?

RO1426

12 MAR 2019

Ref: LPSD

(For official use only)



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

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

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

This form has two parts;

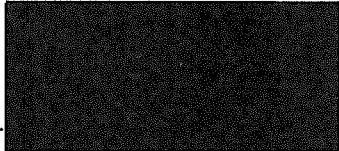
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>PODESTA</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>100 BILLINGE ROAD</u> <u>ASHTON IN MAKERFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0XD</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: 	Email: _____

Signature: 	Date: <u>10/3/19</u>
--	----------------------

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

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

☒ Yes (via email)

☐ No

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

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

RETURN DETAILS

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

or by hand delivery to:

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Telephone: **01744 676190**

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
<p>See separate sheet attached.</p>

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Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

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

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

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

--

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

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1

1. Greenbelt land should only be released in exceptional circumstances.
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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.
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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.
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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)
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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	LP A06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Yes, I wish to participate at the oral examination

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

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. 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.
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 - 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?

RO1427

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

Ref: LPSD

01 MAR 2018

(For official use only)

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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

01 MAR 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Karen</u>	First name: _____
Last Name: <u>Politti</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>57 Birch Grove</u> <u>Ashton in Makerfield</u>	Address: _____
Postcode: <u>WN4 0RX</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____ Date: 27/2/19

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

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

☒ Yes (via email)

☐ No

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

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

RETURN DETAILS

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

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	<i>SITE</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
<i>L P A O 5</i>	<i>1 H A</i>								
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

- Not justified - the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1951. 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 & other urban land. Using Greenbelt fails to encourage this.
- The release of Greenbelt will cause significant harm to the purposes of the Greenbelt
- Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes & other services. The use of cars is being encouraged because of the lack of facilities
- The access to the site on either Billinge Road or Gaswood Rd would be inadequate. Any necessary highways works must be funded by the developer & not the council tax payers.

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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①-LPA06
②-Statement of Common Ground
PRO063
77

Ref: LPSD
01 MAR 2018
(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.

01 MAR 2019

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: Karen

Last Name: Pollitt

Organisation/company: _____

Address: 57 Birch Grove
Ashton in Makerfield

Postcode: WN4 0RX

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 27/2/19

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

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

☒ Yes (via email)

☐ No

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

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

Policy L P A 0 6	Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

- 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 & other urban land. Using Greenbelt fails to encourage this.
- The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.
- Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes & other services. The use of cars is being encouraged because of the lack of facilities.
- there is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

①

②

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

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

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

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1428



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: MICHAEL	First name:
Last Name: POOLE	Last Name:
Organisation/company: OVER 50 GROUP	Organisation/company:
Address: 1, HAYFIELD WAY CLOCKFACE ST. HELENS	Address:
Postcode: WA9 4GU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1429



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANN	First name:
Last Name: POOLE	Last Name:
Organisation/company: OVER 50s Group	Organisation/company:
Address: 1 HAYFIELD WAY CLOCK FACE	Address:
Postcode: WA9 4GU ST. HELENS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1430

ELD/69



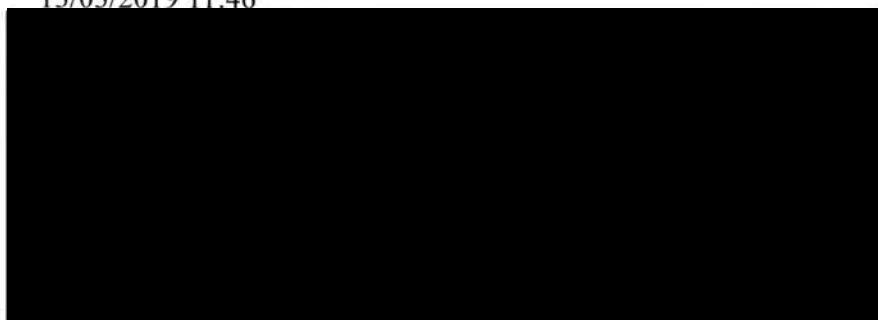
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation

Peter Black

to:

planningpolicy

13/03/2019 11:46



① - LPA04

② - LPA04-1

③ - GBR

④ - LPA06

⑤ - LPA10

1 Attachment



St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black

Blackfryers Planning and Environmental Consultants

9 Ecclesbridge Road

MARPLE SK6 7PF



St Helens Local Plan – submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX	Croft Parish Council Clerk to the Council Mr. M. Pope Unit K1, Taylor Business Park Warrington Road, Risley WA3 6BH
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1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the Submission Draft for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- Employment Land Needs Assessment – Addendum Report January 2019; and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision '*By 2035, St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. A range of high-quality new employment development will have taken place...*'.

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide '*balanced regeneration*' or '*sustainable growth*' or provide '*high quality new employment*'. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a world leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

2 Summary

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by existing and new road building. It:

- Is wasteful of land, including good quality agricultural land
- Would destroy the integrity of the Green Belt
- Bring a low density of poorly paid and low skilled jobs
- Would entrench car dependency both in St Helens and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality
- Increase climate change gas emissions and reduce air quality
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

Parkside West and Parkside East, rather than offering a '*transformational employment opportunity*' will mainly attract low-skilled and poorly paid jobs, eat up large tracts of Green Belt and are unlikely to bring many of the claimed benefits. The same is true for the other planned Green Belt logistics developments within St Helens such as Florida Farm.

For employment, the Growth Scenarios used are over-optimistic and are based on significant and unrealistic assumptions about in-migration to the Liverpool City Region. Estimation of land required has used a poor methodology, leading to a gross overestimate of land needed. The focus on logistics creates poor quality employment – low employment density, low skilled jobs and low wages. It also ensures a 'Race to the bottom' with other local authorities chasing the same logistics jobs.

We oppose the following proposed allocations as Strategic Employment Sites under Policy LPA04.1 for reasons outlined in the rest of this document:

- 2EA: Land at Florida Farm North, Slag Lane, Haydock22;
- 6EA: Land west of Millfield Lane, south of Liverpool Road and N of Clipsley Brook, Haydock;
- 7EA: Parkside East, Newton-le-Willows; and
- 8EA: Parkside West, Newton-le-Willows.

We think the employment strategy should be recast to focus on education and training, leading to higher quality employment and manufacturing. This is a more difficult path to follow than drawing a red line around large sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if St Helens is to be prosperous and have a future good quality of life.

3 Employment land and logistics

3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
- Amount of employment land needed per year calculated illogically
- Five-year buffer included – this is not required by any planning guidance

- Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the Employment Land Needs Assessment – Addendum Report January 2019 (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

3.1.1 Baseline calculations

Confusingly the submission draft details employment land need from **2012-2035** rather than the plan period 2020-35. It suggests 5.8 ha/y is needed, making 133.4ha, plus a five year 'flexibility buffer' (29ha) and an 'allowance for Liverpool SuperPort¹ and Parkside (65ha) making 227.4ha.

Netting off 'Take-up between 1 Apr 2012 and 31 Mar 2018' and 9.3ha existing land supply, the submission draft suggests that **215.4 hectares** of land for employment development should be allocated between April 2018 and March 2035. As relatively little employment land was used from 2012 to 2018, the effect of using 2012 as a baseline is to inflate the theoretical amount of land needed. This is nonsensical, as 2012-8 is in the past – there is no need to provide land for a period that has already happened

Using ELNA methodology but applying it to the actual plan period (2020-35) and assuming 15 years@5.8 ha/y = 87ha, plus buffer (29ha) and allowance for SuperPort and Parkside (65ha) gives 181ha. Adding 5.8ha for 2019 but netting off 9.3ha existing land supply suggests **177ha is required – roughly 50 ha less than claimed by St Helens, even if ELNA methodology is accepted.**

3.1.2 Amount of employment land needed per year

The ELNA methodology is far from objective. It is predicated on the assumption (ELNA 2.11) that *'employment land take-up in St. Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites.'* This is not supported by evidence. The only evidence provided is that take-up in some other areas such as Liverpool and Warrington (but not others) was historically greater. Liverpool has a city centre and port - no port in St Helens! Warrington has far better road and public transport communications, and the benefits of new town development including good quality housing and an environment far more attractive for higher quality employment. This means it is not possible to compare arbitrary local authority areas on this basis.

ELNA considered past take-up of employment land and job forecasts as the preferred basis of the forecasting of the employment land need, and this has some merit. However, this past take-up has not been constant, with lower growth before 1998 and little after 2008. Therefore, longer historical take-up periods are the most appropriate for the forecasting as they smooth out boom and bust. ELNA arbitrarily chose 1997-2012, as from 2012-2015 there was a significant decline in employment land take-up in the Borough. This was attributed to a lack of sites, although ELNA presented no evidence as to why this might be the case. This is important as from 1997-2015 147 ha were taken (4.9 ha/y), but 1997-2012 take up was 174 ha (5.8 ha/y). Given that 2015 is more recent than 2012, it seems logical and more scientific that the 4.9 ha/y figure for the period 1997-2015 is used².

¹ Liverpool SuperPort is in Liverpool rather than St Helens.

² Central Government offered a comparable example of unscientific use of statistics in 2019 by choosing to ignore new household formation statistics because the outdated figures fitted their political policy better.

3.1.3 Five-year buffer

ELNA also included a five-year buffer. National Planning Policy Framework (NPPF) mentions the need to make provision for employment land. It mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion that there needs to be a buffer for employment land.

3.1.4 Need for 'Major sites'

ELNA 2.3 suggests '*Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation*'. Estate agents would say this, wouldn't they! This is simply hearsay, not scientific and should have no place in a report that purports to provide an 'objective' assessment. Or perhaps estate agents should write the housing policies too?

ELNA also added '30-40ha' for '*additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends*'. No justification was provided for either 'major projects' need or why 30-40 ha was chosen. In the submission draft 30-40ha figure has been arbitrarily inflated to 65ha, without justification.

Given that other local plans and GMSF intend to allocate land for major projects, this is an issue that should be settled at a regional level. It is possible that a 'Major Site' is needed in St Helens. Given the lack of evidence to establish need (which is not the same as demand) there is no justification to simply add the areas for a major site onto a calculation of need. On this basis, allocation of land for 'major projects' fails the 'Duty to Co-operate' test.

3.1.5 Actual need for employment land

The table below shows several alternative ways of using past demand data to estimate how much land should be allocated for employment uses. A more objective view suggests that the methodology adopted in the submission draft grossly overestimates both need and demand.

In a scenario with realistic growth, no buffer (which is not required by NPPF) and no additional allowance for major sites (which have not been agreed regionally anyway) assumed, then the Councils' allocation exceeds need by a massive 158 ha, or 329%. The Council figures are not credible.

Table 1 Employment land needed under different scenarios

(All ha)	5.8 ha/y	4.9 ha/y	5y buffer	SuperPort Parkside	Adjustment	Allocation required	Difference to draft
Submission draft 2012-2035	133.4	-	29	65	-2.7 -9.3	227.4	0
2020-35 using ELNA and higher demand	87	-	29	65	+5.8 -9.3	177	-50
2020-35 ELNA methodology	-	73.5	24.5	65	+4.9 -9.3	158.6	-68.8
2020-35 ELNA methodology, no 5y buffer	-	73.5	0	65	+4.9 -9.3	134.1	-93.3

2020-35 ELNA methodology, no 5y buffer or major sites	-	73.5	0	0	+4.9 -9.3	69.1	-158.3
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3.2 Employment and related issues

Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. Excluding construction jobs which are temporary, a Regional Distribution Centre houses just one job per 77m². It is widely accepted that increased automation is having a particularly significant effect on distribution. There is a drive towards greater automation to increase the speed and efficiency of multi-product order picking, which at present is largely manual. As racking techniques and stock management software advance there will be further reductions in jobs.

Unemployment in St Helens appears relatively low compared to historic levels, but this is disguised by a harsh social security regime that deters claimants, and the absolute unemployment level hides low pay, increasing casualisation of work, low productivity, under employment³ and poverty. The proportion of residents without any qualifications (12.4%) is 58% above the national average (7.6%). Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages. St. Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics.

The Liverpool City Region LEP: Growth Scenario, November 2016 was intended to present an upbeat picture of potential growth in order to attract central Government funding. This approach is flawed because all regions (including Warrington/North Cheshire and Greater Manchester) have to present high growth to access funding otherwise lack of his funding will ensure the area falls further behind – a Catch 22 situation. Other issues with the Growth Scenario include:

- Higher in-migration to the City Region is assumed without any evidence where the people will come from or what they will do. Will Manchester empty out?
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through 'transformational developments'.

It is understood that 'transformational developments' means 'logistics'. Of 10,000 jobs expected to be created, about 80% are in logistics warehousing and support services and associated transport. It remains to be seen if logistics jobs result in a rush of bright, well-educated, enthusiastic people into St Helens who will transform the economy.

The growth forecasts deliberately underestimate job displacement. The number of logistics jobs for import and distribution of a given amount of goods is relatively fixed although the locations are footloose. This means additional logistics jobs in St Helens would otherwise have been located elsewhere. If logistics jobs are truly additional for the sector, then they probably represent:

- Additional imports– in which case jobs are being displaced in UK manufacturing
- Growth of internet shopping – in which case jobs are being displaced in traditional shops

³ ELNA 5.16 suggests underemployment in St Helens is 'hard to quantify', so doesn't bother.

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests '*Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...*'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

4 Green Belt

4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that '*The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment.*' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'.

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen 'large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside.

4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration.

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

ensure that it is developed. Given the uncertainty and volatility of the logistics sector, and the significant oversupply of employment land explained in 3.1.5 of this document it is neither necessary nor prudent to take this land out of the Green Belt now.

4

5 Parkside East, West and rail interchange

5.1 What is Parkside?

One of the problems with discussing 'Parkside' is that it means different things to different people. 'Parkside colliery' includes just the footprint of the original colliery buildings to many but usually also includes the spoil heaps and ancillary infrastructure much of which is now green and home to more biodiversity than when the land was agricultural. The 'Parkside area' includes additional land between the M6, the A49, the Chat Moss rail line and Warrington which was never affected by colliery activity and has remained open and agricultural. St Helens consider land to the East of the M6, as 'Parkside East' although this is clearly a misnomer and intended to convey the impression that it is either previously used or otherwise suitable for development. It is not related to the Parkside Colliery area and will probably attract different types of employment.

The whole site is currently Green Belt. Mining and associated activity was allowed through a special license and there was a clear understanding that the land remained Green Belt during this activity, and that it should be restored to a land-use compatible with its Green Belt designation when coal-related activity ceased. The preferred use at the time was agriculture, although now other uses could be compatible with Green Belt designation. Given the large amount of available distribution warehouses and proposals elsewhere, the scheme cannot possibly meet the very high bar of 'very special circumstances' that are needed to justify removal of land from the Green Belt.

Part of Parkside West is currently subject to a piecemeal, speculative planning application known as 'Parkside Phase 1'. An analysis of this suggests that the development will create a few low paid and low-skilled jobs; no development alternative have been considered that would lead to higher skilled, better paid jobs. An objective assessment suggests that just 100 new jobs would be created.

5.2 Parkside and the Green Belt

The Green Belt is designated for five reasons:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging recycling of derelict and other urban land.

1

In the northwest urban regeneration was the most important reason for Green Belt designation. In this case the Green Belt performs an important role in separating Newton-le-Willows and north Warrington/Winwick. The proposal for Parkside East particularly would constitute very significant encroachment into the countryside and narrow the gap between settlements unacceptably.

While some of the land in Parkside West could be considered derelict or brownfield, a large part of it is not, the site is essentially rural. Warehouses next to a motorway are not 'urban regeneration'.

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

5.3 Parkside and other plan policies

Parkside fails Policy LPA03: Development Principles '*3. Improve the economic well-being of the Borough's residents by a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people*'. Parkside does not create 'a range of employment and training' – it continues the dominance logistics jobs, provides almost no training opportunities at all, and is certainly not '*readily accessible by non-car modes of transport*', being a motorway-based site inevitably poorly served by public transport and with a hostile local environment for walking and cycling.

5.4 Rail connection at Parkside?

Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) '*with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes*'. Of the proposed allocation of 124ha of land at Parkside East it is estimated that 64.55ha will contribute to employment land with the remaining 60ha being required to provide related rail access. This is used as a justification for removal from the Green Belt.

Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing rail-based logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

4.6.12 suggests Parkside 'will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort.' St Helens is 13 miles from Liverpool, which already has excellent existing rail and road links to the docks, so it is hard to see how development at Parkside could add to Liverpool SuperPort. Similarly, the regional already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. There are other currently underused rail links (for instance in Halton and Knowsley).

4.36.1 states that there is '*a long-standing history of developer interest in providing a SRFI*' near the former Parkside Colliery. There may have been interest, but for a variety of reasons including transport, planning, environmental and viability there has been no serious and viable scheme put forward in almost 20 years of activity. There is no reason to suggest that this has changed. The

'reasoned justification' for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

It is not obvious how a rail link would be funded. The promoters (effectively St Helens Council) wish to go ahead with a first phase of development at Parkside West now, without this providing any contribution towards a rail connection. If, as seems likely the sites are developed piecemeal, then there is no prospect of a rail connection, or significant use if it is provided.

5.5 Battle of Winwick

The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

- A574 from Risley through Culcheth and Glazebury to the A580. Vehicles cannot get out onto the A580, which is itself completely jammed by the traffic escaping from the M6.
- B5207 from Culcheth to Lane Head (Golborne) has cars backed up to Culcheth village centre.
- Kenyon Lane, Stone Pit Lane/Sandy Brow Lane, and Heath Lane/Mustard Lane from Lane Head to Winwick/Birchwood via Kenyon and Croft, with static queues in both communities.

The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards 'just in time' logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.

The area already suffers from air pollution including designated air quality management areas. NPPF para 7 suggests that planning has an environmental role – *‘using natural reserves prudently, minimising waste and pollution, and mitigate and adapt the climate change including moving to a low carbon economy’*. The designation of Parkside East and West will:

- Use fossil fuel reserves profligately and encourage climate change gas production
- Encourage production of air quality pollutants (mainly NOx, but also particulates) through the current exclusive use of diesel engines in goods vehicles.

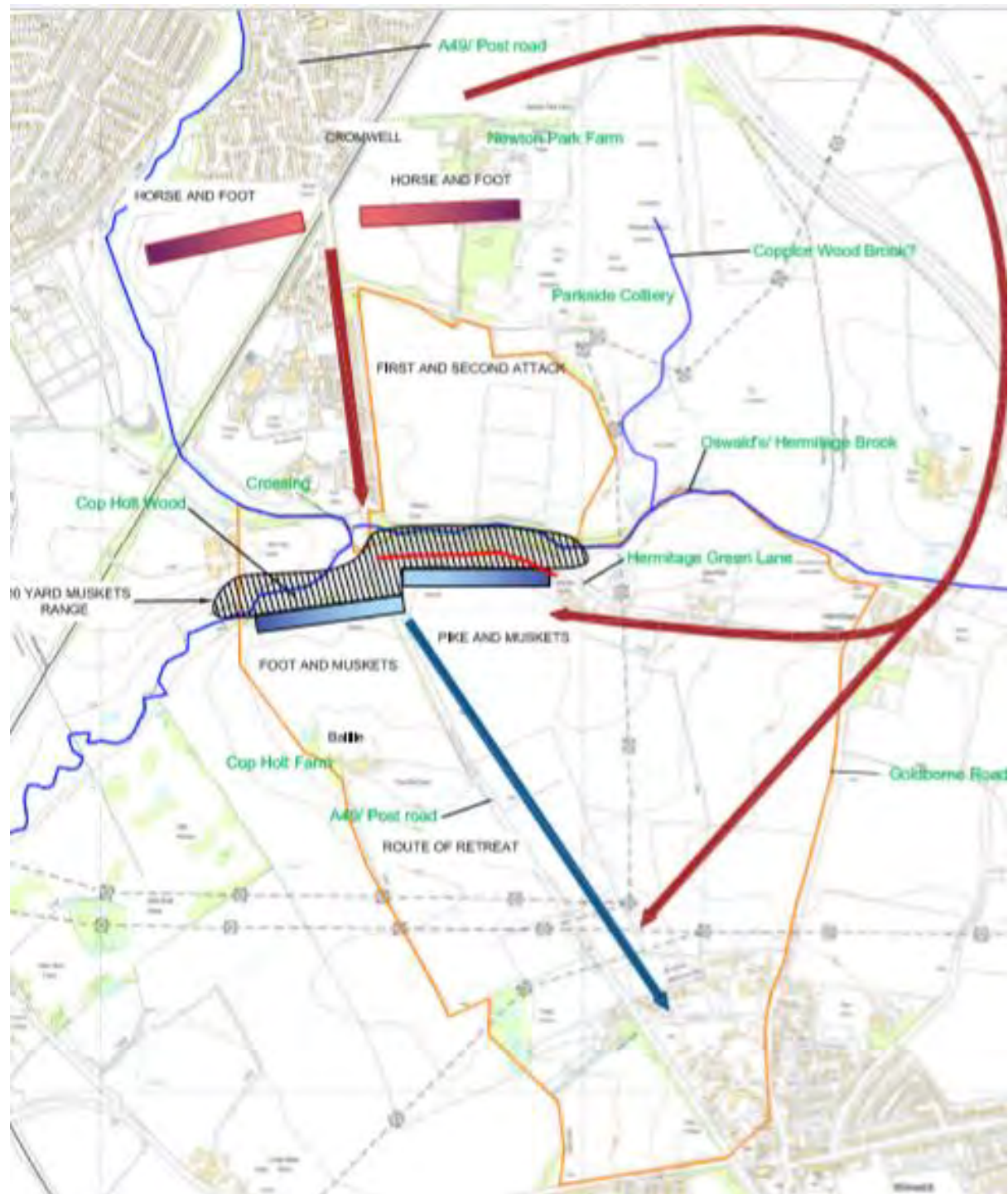
Para 17 suggests that local authorities should *‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’*. Parkside East and West would be difficult to access except by car. Walking and cycling in the area is already inconvenient, indirect, and dangerous due to traffic speed and volumes and poor air quality

NPPF suggests that planning should *‘Support the transition to a low carbon future’*. Parkside East and West is wholly based on road transport that creates more carbon emissions than either rail transport – which in this location would be powered by electricity and increases the likelihood that goods will travel long distances to their destination. It will therefore increase carbon emissions.

NPPF also suggests that development should *‘Contribute to conserving and enhancing the natural environment and reducing pollution’*. A currently open and mainly green site will be covered with an urban sprawl, and the main access method will be by diesel heavy goods vehicles that will produce particulates and oxides of Nitrogen that are known to cause hundreds of early deaths each year in the St Helens area, and thousands nationally.

End of document appendix follows

Appendix Battle of Winwick battlefield site



RO1431

① - LPA05
② - LPA06

505

12 MAR 2019

PP0458

Ref: LPSD

(For official use only)



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: MICHAEL

Last Name: POCKAN - MURRAY

Organisation/company: _____

Address: 346 3 MURFIELD PARK
GOLBORNE

Postcode: WA3 3XS

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 2/3/19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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RETURN DETAILS

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St.Helens Council
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WA10 1HP**

or by hand delivery to:

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for each separate comment/representation.**

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
1HA LPAS		Smoke AM							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Lack of Doctors, Dentist, School places</p> <p>Population figures incorrect</p> <p>Traffic congestion - no infrastructure</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete ^{LAND} greenbelt
from proposed removal
for greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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1800756M

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3. To which part of the Local Plan does this representation relate?							
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IHS LP06		Billings Bridg GR					
Other documents (please name document and relevant part/section)							

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Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Carnal has done nothing to make discont brought sites become available on register Food security plan is ineffective does not address congestion Hagdock House figures used not sound</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete LAND from paper
Remove from green belt

Please continue on a separate sheet if necessary

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<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

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RO1432



St. Helens
Council

12 MAR 2019

Ref: LPSD

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR and</u>	Title: _____
First Name: <u>BENJAMIN</u>	First name: _____
Last Name: <u>PORTER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>1 THORNHILL ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

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☒ Yes (via email)

☐ No

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¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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3. To which part of the Local Plan does this representation relate?								
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>See separate sheet attached.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Green Belt.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Please keep a copy for future reference.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. 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)
 - c. 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

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3. To which part of the Local Plan does this representation relate?							
Policy	LPA06 Site IHS	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
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Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Positively Prepared?	<input type="checkbox"/>
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Delete this land from the proposed
removed from the Green Belt

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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LPA05 – SITE 1HS

2

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 - 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?

RO1433

①-LPA05

②- Statement of Common Ground

PF0586

③-LPA06

638

④- Statement of Common Ground 13 MAR 2019

St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: STEWART

Last Name: POSTLETHWAITE

Organisation/company:

Address: 508 GARSWOOD ROAD

ASHTON IN MAKERFIELD

WIRAN

Postcode: WN4 0XH

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date:

8/3/19

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Local Plan
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St Helens
WA10 1HP

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA 05 Site 1HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>NOT JUSTIFIED – The local population has actually been in decline for some time. More housing on Greenbelt land is NOT required. If any future potential increase arises, the council should be able to cover this using homes which are currently empty and rejuvenating current brownfield sites.</p> <p>NOT EFFECTIVE – The current infrastructure in the area is not suitable for an increase in homes. There are no planned or costed improvements to the schools, doctors surgery, road network recreation facilities or shops.</p> <p>NOT CONSISTANT WITH NATIONAL POLICY – There is no statement of common ground with neighbouring authorities. Government states "councils must prioritise development to brownfield land and bring life back to abandoned sites. These will only increase if new sites are used for homes.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please delete this land from the proposed Removal From The Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06 Site 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
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Please continue on a separate sheet if necessary

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Please delete this land from the proposed Removal From The Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1434



St. Helens
Council

① - LPA05 ② - Statement of Common Ground P10587
③ - LPA06 ④ - Statement of Common Ground 13 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JO - ANNE

Last Name: POSTLETHWAITE

Organisation/company: _____

Address: 508 GARSWOOD RD.

ASHTON IN MAKERFIELD

WIGAN

Postcode: WN4 6XH

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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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Other documents (please name document and relevant part/section)								

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
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Please continue on a separate sheet if necessary

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①

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1435

Representor Details

Web Reference Number	WF0127
Type of Submission	Web submission
Full Name	mrs Sheila Potter
Organisation	
Address	1 Eccles grove clock face WA94XD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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No, I do not wish to participate at the oral examination

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Response Date	3/12/2019 9:46:30 PM
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RO1436

Site 8HA

E10140



Revised Local Plan representations
starcottage
to:
planningpolicy
12/03/2019 22:41

① - LPAOK

② - Para 1.7.2

③ - S.A.

Dear Sir , please accept this email as our comments on the revised St Helens Local Plan.

Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So it is very reasonable to conclude that SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1 and should have been removed.

As far as we are aware the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

We are unaware of exceptional circumstances to justify not using the standard method to calculate housing need, therefore there are no exceptional circumstances to change Green belt boundaries

All available brownfield land , contaminated land and previously developed land should be used before any grade 1 agricultural land is used for housing.....this should be a national requirement.

We understand that there has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. The Council should be required to undertake such a consultation and publish the response.

The loss of Dial House wood adjacent to HA8 is unacceptable. The Council's statement that this is mitigated for is not accepted. Rainford has very little mature woodland and the removal of this wood is detrimental to the wildlife which need such woodland for survival.

Yours faithfully

Nigel and Helen Powell

13 Mossborough Road

Rainford

WA11 8QN

RO1437



Development Plans for Rainford
Jeanette Powell to: planningpolicy

13/03/2019 16:21

Dear Sir/Madam

I am writing with regard to the proposed development plans for Rainford. These plans have been going on for some time now and are very concerning. I would urge these plans to be re considered.

The proposal is to increase the village of residents by a third. We already have too many cars on the roads in the village and people are parking in safely. [REDACTED]

[REDACTED] We do not have enough shops and local amenities as it is to supply the village. Simply getting a doctors appt is near impossible! Having an additional third of the population of the village could only result in what I can see as absolute chaos.

We are being told that St Helens does not have enough brown belt land for the additional housing needs which seems absolutely ludicrous as it's quite obvious there is an abundance of brown belt land across St Helens due to its industrial past.

The proposals are green belt land which is currently being farmed and would result in the loss of many jobs.

Traditionally Rainfords history is farming, a rural area with open countryside for wildlife and farming. I understand times change and when housing is needed then we have to look at the options but I do feel the council is being lazy with the intention to just build on the green belt in Rainford as there's lots of available land. Let's not spoil what we have, there are plenty of other areas around St Helens that could house the plans you are suggesting and the much closer to the city centre with more available school, shops, doctors etc and room for more of these services to be developed. In Rainford where on earth are we going to put the schools and doctors surgeries that are needed to support the extra population?

I totally understand the need for additional housing but developing on green belt land is not the answer.

I appreciate you taking the time to read this email and take it into consideration.

Kinda regards
Jeanette Powell
39 Beech Gardens
Rainford
WA11 8DL

Sent from my iPhone

RO1438

①-LPA05 ②-GGN ③Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0273
Type of Submission	Web submission
Full Name	Mr Stephen Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Wa10 5HN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

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should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 9:57:39 AM
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RO1439

① - LPA05 ② - Green Belt Review ③ - GEN

Representor Details

Web Reference Number	WF0275
Type of Submission	Web submission
Full Name	Dr Deborah Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Merseyside WA10 5HN
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS\LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the Local Plan is unsound due to it being based on flawed historical data that does not justify the aspiration targets included in the plan.

The housing needs for the local area does not use standard Methodology and no case for exceptional circumstances has been made. Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

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The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

The increase in traffic proposed in the plan will have significant impact on air quality for the next generation. The access to local doctors is currently impossible and would be made much worse. the argument that more surgeries will open is not an adequate answer when GPs are retiring faster than being recruited or trained. There is no evidence of collaboration with the Hospital Trust, local CCGs or education Authorities. The Plan is not effective.

3

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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No, I do not wish to participate at the oral examination

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Response Date	3/10/2019 9:37:32 AM
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RO1440



St. Helens
Council

715

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: GERARD	First name:
Last Name: POYNTON	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 19 WAKESIDE GARDENS RAINFORD - ST. HELENS MERSEYSIDE	Address:
Postcode: WA11 8HH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

9th FEBRUARY 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy ALL	OBJECTION	Paragraph / diagram / table	OBJECTION	Policies Map	OBJECTION	Sustainability Appraisal/ Strategic Environmental Assessment	OBJECTION	Habitats Regulation Assessment	OBJECTION
Other documents (please name document and relevant part/section)				LPSD OBJECTION TO BUILDING. BUILDING ON HIGHER LAKE AND EAST OF ROOKEY LAKE					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- Existing village infrastructure further pressure.
- Water taste of the field.
- Traffic increase.
- Parking in village increase.
- Removing green space / farming land.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO1441



St. Helens
Council

716

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LINDA	First name:
Last Name: PUGHION	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 19 LAKESIDE GARDENS - RAINFORD, ST. HELENS MERSEYSIDE	Address:
Postcode: WA11 8TH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

9th FEBRUARY 2019

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Yes ☒ (Via Email)

No ☐

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	OBJECTION	Paragraph / diagram / table	OBJECTION	Policies Map	OBJECTION	Sustainability Appraisal/ Strategic Environmental Assessment	OBJECTION	Habitats Regulation Assessment	OBJECTION
Other documents (please name document and relevant part/section)				LPSO OBJECTION TO BUILDING. BUILDING ON HARTER LANE + EAST OF ROOKERY LANE					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- Existing Village Infrastructure further pressure
- Water table of field.
- Traffic increase
- Parking in village increase
- Removing green space / farming land.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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☐ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

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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.**

RO1442



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For office use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SHONA</u>	First name: _____
Last Name: <u>PRENDERGAST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>29 THORNHILL ROAD</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0SR</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>28 Feb 2019</u>
------------------	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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planningpolicy@sthelens.gov.uk

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 06 SITE 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The council needs to have proof of the population estimate.
Release of Greenbelt in this area will cause harm to the purpose of Greenbelt.
Greenbelt is to assist urban regeneration.
encouraging recycling of debris and other urban land.
Increased housing in Corswood is not sustainable due to lack of school places, doctor's surgeries, bus routes and shops. This will increase pollution as cars would be needed due to lack of facilities.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from Greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

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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)

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Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SHONA

Last Name: PRENDERGAST

Organisation/company: _____

Address: 29, THORNHILL ROAD

CARRWOOD

WIGAN

Postcode: WN4 0SR

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 28/2/19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 05 SITE 1 HA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The release of Greenbelt will significantly harm the purpose of Greenbelt areas.</p> <p>There would be a shortage of school places, doctors surgeries (it can be difficult at present to book appointments), bus routes, shops, which would result in ^{using} more cars increasing traffic in the area. At peak times already long queues at crossroads at Golf Club.</p> <p>Access to the site on either Billinge Road or Gorswood Road would be inadequate.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

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RO1443



St. Helens
Council

① - LPAOS

② - Statement of Common Ground

PFO151

171

Ref: LPSD

01 MAR 2019
(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARIAN</u>	First name: _____
Last Name: <u>PRESCOTT</u>	Last Name: _____
Organisation/company: <u>Raffo</u>	Organisation/company: _____
Address: <u>209 LIVERPOOL RD</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 9RX</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>25/2/19</u>
------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? DONT KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - The Council should be put to strict proof of its population estimates coming from the population of St. Helens has been in decline since 1981, which equals the extra people by encouraging the regeneration of green belt is to assist in urban regeneration by encouraging the regeneration of derelict land and other urban land using green belt for the purposes of the green belt. The release of green belt will cause significant harm to the school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of lack of facilities. Access to site is inadequate, a left in left hand turn East Lancs Rd isn't safe and the proposal for a junction of Liverpool Rd / Orange Rd would put additional traffic on an already overstretched highway system. There would be problems of re-routing through proposed developments. There are existing flooding problems at this site any remedial to prevent this would place even greater amounts of water into Clipseley Brook. There is no doubt of common ground with neighbouring authorities.]</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/> NO	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.



① - LPA04

② - Statement of Common Ground

PP0152

172

Ref: LPSP

01 MAR 2019
(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: MARIAN

Last Name: PRESOTT

Organisation/company: RAFFO

Address: 209 LIVERPOOL RD
HAYDOCK

Postcode: WA11 9RX

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 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.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy 15A LPA 04	SITES 2 EA 5 EA 6 EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant? DO NOT KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

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 purpose of the Greenbelt. The council has already granted planning permission in the Greenbelt in respect of site 2 EA - Florida Farm North. The risk of flooding further down the Clippesley Brook will be exacerbated by further developments at this location. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity. There is no statement of common ground with neighbouring authorities.

7. Please set out 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 last from the proposed removal of greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1444

Representor Details

Web Reference Number	WF0439
Type of Submission	Web submission
Full Name	Mr Alan Prescott
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	New house building policy
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why 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.

Sufficient brown field sites in the borough which can provide the type of houses at affordable prices for future requirements re first time buyers. Most houses Built on green field sites are not first time buyer and affordable they are primarily 3/4 bed detached.

Also sufficient housing stock to cater for the requirements of detached properties.

7. Please set out modification(s) you consider are necessary

Re instigate the status of Eccleston Park golf club to Green Belt land and review again after 2035

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/26/2019 4:37:21 PM
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RO1445



I would like to object to the proposed local plans as follows.

1. 2ES
2. 4EA
- 3.6EA
- 4.5EA

These plans will have a negative effect on the quality of life of all local residents both in St Helens and Ashton-in-Makerfield.

The air quality is already poor and can only be made worse.

Volume of traffic is also a big problem in this area and we dread the prospect of even more heavy traffic.

Surely brown field sights could be found in the St Helens area causing less obstruction and damage than these Green Belt sights.

Yours truly

Madeleine Preston
4 Calverhall Way
Ashton-in-Makerfield
WN49LB

Sent from my iPhone

RO1446



{In Archive} Local Plan
Colin Preston to: planningpolicy

18/01/2019 18:16

[REDACTED]

I must stipulate the local plan is not what anyone needs in my area
First Windle is a very busy area and any green belt should be kept as green
belt for future generations .
The info structure can't cope with more homes we are now having problems
with access to Doctors local schools etc the new fire station will be town
centre adding longer response times.
2035 is only 16 years away this plan should be taken of the table.
I am against the plan and will be letting my local councillors know [REDACTED]

[REDACTED]

I only hope the powers that be act now and scrap the local plan using green
belt land

I will continue to support the fight against this plan [REDACTED]
and support any action needed to reverse any plan to use green belt land

Kind Regards

8/15
LACB.
Mr & Mrs Preston
27 Fistrall Drive
Windle
WA10 6EF

Sent from Colin Preston iPhone

RO1447

Representor Details

Web Reference Number	WF0046
Type of Submission	Web submission
Full Name	Mr Alan Preston
Organisation	Mrs
Address	120 Avon Road Billinge WN5 7SF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Council should be put to strict proof of their population estimates as the population appears to have been in decline for 30+ years.

The use of this land does not encourage developers to use brownfield sites that are available for redevelopment (and have been for numerous years) as it is not as profitable. The Council should not allow profitability above the health of its constituents and damage to the environment through the use of greenbelt land.

There is a shortage of local resources in the form of school places and adequate transport links. Building without the ability to offer school places to residents will cause an increase in traffic by forcing pupils to take places in areas such as Billinge, for which car journeys will be necessary; this goes against the promotion of healthy school initiatives such as walk to school or ride to school. Health services are massively overstretched in the Garswood and Billinge area. The CCG has suggested there is capacity, however, there is a recruitment issue. This is starkly reinforced by the imminent loss of a local GP who will be retiring early having worked in the area for a considerable number of years and is well respected and regarded, but is now so overstretched he is leaving. Adding further population, to an increasingly ageing and potentially more health care reliant population when there is already a significant recruitment and retention problem potentially endangers the health of many.

There are a considerable number of housing and industrial developments being planned or built within the local area, including in adjacent authorities which I believe are not being considered in terms of the impact upon congestion, services and sustainability in our area.

Access to the area is poor in terms of current road layout and should be considered and not be a cost to tax payers if the plans proceed.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 3:50:40 PM
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RO1448

Representor Details

Web Reference Number	WF0051
Type of Submission	Web submission
Full Name	mrs sarah preston
Organisation	Mrs
Address	120 Avon Road Billinge WN5 7SF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Council should be put to strict proof of their population estimates as the population appears to have been in decline for 30+ years.

The use of this land does not encourage developers to use brownfield sites that are available for redevelopment (and have been for numerous years) as it is not as profitable. The Council should not allow profitability above the health of its constituents and damage to the environment through the use of greenbelt land.

There is a shortage of local resources in the form of school places and adequate transport links. Building without the ability to offer school places to residents will cause an increase in traffic by forcing pupils to take places in areas such as Billinge, for which car journeys will be necessary; this goes against the promotion of healthy school initiatives such as walk to school or ride to school. Health services are massively overstretched in the Garswood and Billinge area. The CCG has suggested there is capacity, however, there is a recruitment issue. This is starkly reinforced by the imminent loss of a local GP who will be retiring early having worked in the area for a considerable number of years and is well respected and regarded, but is now so overstretched he is leaving. adding further population, to an increasingly ageing and potentially more health care reliant, locality when there is already a significant recruitment and retention problem potentially endangers the health of many.

There are a considerable number of housing and industrial developments being planned or built within the local area, including in adjacent authorities which I believe are not being considered in terms of the impact upon congestion, services and sustainability in our area.

Access to the area is poor in terms of current road layout and should be considered and not be a cost to tax payers if the plans proceed.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 3:35:57 PM
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RO1449

Representor Details

Web Reference Number	WF0391
Type of Submission	Web submission
Full Name	Mrs Beryl Preston
Organisation	
Address	1 Lynton Way, Windle, st helens Wa106eq
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There is lots of previously developed/brownfield land available in our borough...much more than the amount of Greenbelt planned for release which the council have failed to mention in the local plan. Neighbouring Councils have developed contaminated land successfully recently. Road networks would struggle to cope with the extra traffic and the area around 8hs is already an accident black spot. The council are working on 2014 predictions for growth when 2016 predictions are available. The plan is not effective

7. Please set out modification(s) you consider are necessary

Brownfield land, previously developed and contaminated land should be remediated as in previous large developments in our borough before and release of grade1&2 agricultural 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 4:42:54 PM
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RO1450

Representor Details

Web Reference Number	WF0392
Type of Submission	Web submission
Full Name	Mr Gary Preston
Organisation	
Address	1 Lynton Way Windle St.Helens WA10 6eq
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Contaminated land should be remediated as was done before on previous large developments in St.helens and by neighbouring Councils recently. There is much more Brownfield land available than the Greenbelt area set for release.

7. Please set out modification(s) you consider are necessary

Brownfield sites should be considered well before Greenbelt land being released. Much of the borough is barren and in need of redevelopment. The Council know there is more Brownfield land available than the amount of Greenbelt planned for release.

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 4:29:10 PM
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RO1451

EF0004

①-LPA06, 3HS



Submission on local plan from JMPrice - attached
D&J Price
to:
planningpolicy
04/03/2019 16:25



1 Attachment



lpsd-representation-form-from-JMPrice-March-2019.doc

Please accept attached.

On Behalf Of planningpolicy@sthelens.gov.uk

Sent: 18 January 2019 16:47

To: planningpolicy@sthelens.gov.uk

Subject: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft - All representations must be received by 5.00 pm on Wednesday 13th March 2019

Dear Sir or Madam,

**St.Helens Borough Local Plan 2020-2035: Submission Draft
Town and Country Planning (Local Planning) (England) Regulations 2012**

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St.Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or
- by email to planningpolicy@sthelens.gov.uk; or
- by using our on-line form at www.sthelens.gov.uk/localplan.

All representations must be received by 5.00 pm on Wednesday 13th March 2019.
Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at www.sthelens.gov.uk/localplan, and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

Data protection

We process your personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email planningpolicy@sthelens.gov.uk.

How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,



Development Plans Manager

(See attached file: Statement of Representation Procedure.pdf)

"This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed. It may contain privileged information. Any unauthorised review, use, disclosure, distribution or publication is prohibited. If you have received this e-mail in error please contact the sender by reply e-mail and destroy and delete the message and all copies from your computer. "



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

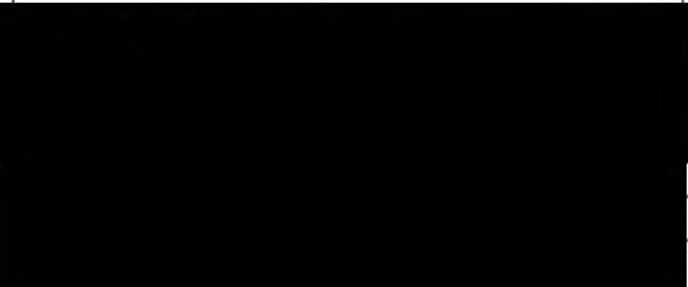
This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Jacqueline (Jackie)	First name:
Last Name: Price	Last Name:
Organisation/company: N/a	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature



Date:

4th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email) **YES PLEASE UPDATE**

ME BY EMAIL

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> Don't know <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/> No <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> Don't know <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> No
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The areas leading into the Wood land Trust land are delightful to walk at any time of year – and they are within walking distance of my home, I hope would be very sad to loose these.

Brown field sites should be used first, only if they prove to be not enough should other areas be looked at, putting areas into reserve keeps a dark cloud over our heads and that is not kind or necessary.

The roads get blocked up at times and additional traffic will cause more issues.

Our doctors are already one GP down and have been for some time, so I fail to see how additional GP's can be brought into play.

Parcels of land within built up areas are a refuge for wild life.

St Helens is not working with other local authorities to make sure enough green spaces are kept. Each local authority is doing it for themselves. No one is looking at the bigger picture.

More housing means more concrete and more likelihood of flooding.

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 3HS from the proposed removal from greenbelt.

Please continue on a separate sheet if necessary

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After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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.**

RO1452

EFO006

① - LPA06, 3HS



RE: Submission on local plan from DRPrice
D&J Price
to:
planningpolicy
06/03/2019 10:49



1 Attachment



lpsd-representation-form-from-DRPrice-March-2019.doc

Please accept attached.

From: [Redacted] **On Behalf Of** planningpolicy@sthelens.gov.uk
Sent: 18 January 2019 16:47
To: planningpolicy@sthelens.gov.uk
Subject: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft - All representations must be received by 5.00 pm on Wednesday 13th March 2019

Dear Sir or Madam,

**St.Helens Borough Local Plan 2020-2035: Submission Draft
Town and Country Planning (Local Planning) (England) Regulations 2012**

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St.Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or
- by email to planningpolicy@sthelens.gov.uk; or
- by using our on-line form at www.sthelens.gov.uk/localplan.

All representations must be received by 5.00 pm on Wednesday 13th March 2019.

Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at www.sthelens.gov.uk/localplan, and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

Data protection

We process your personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email planningpolicy@sthelens.gov.uk.

How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,



Development Plans Manager

(See attached file: Statement of Representation Procedure.pdf)

"This e-mail and any file transmitted with it are confidential, subject to copyright and intended solely for the use of the individual or entity to whom they are addressed. It may contain privileged information. Any unauthorised review, use, disclosure, distribution or publication is prohibited. If you have received this e-mail in error please contact the sender by reply e-mail and destroy and delete the message and all copies from your computer. "



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dennis	First name:
Last Name: Price	Last Name:
Organisation/company: N/a	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Sig	Date: 6 th March 2019
-----	----------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email) **YES PLEASE UPDATE**

No ☐

ME BY EMAIL

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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.

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> Don't know <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/> No <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> Don't know <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> No
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Blundells Wood which is a Woodland Trust site is a major benefit for the residents of Rainhill. It is a large Greenfield site within the area that should not be built on when Brownfield sites are available.

It provides an area of relaxation and a place that people can exercise in away from traffic noise and pollution. I find it a delight to walk through in all seasons. It is a area of mature deciduous woodland that encourages many species of plants and animals as well as providing wildlife corridors. Woodland is also important in preventing water logging and flooding of surrounding

land .

There are major infrastructure concerns that an increase in population would bring. The roads in Rainhill are becoming increasingly busy and J7 of the M62 struggles to cope at times. Our GP medical practice is down to 2 doctors and no sign of them being able to recruit a third. There would also be more spaces in schools required.

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 3HS from the proposed removal from greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination		
---	--	--

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.**

RO1453



St Helens
Council

825

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

24 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Melanie	First name:
Last Name: Price	Last Name:
Organisation/company:	Organisation/company:
Address: 6 Gordon Avenue, Ashton in Makerfield, Wigan	Address:
Postcode: WN4 0QA	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

3.4.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy .PA05	Paragraph / diagram / table	Policies Map 114A	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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.

AM

2049



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.


Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LP A06	Paragraph / diagram / table		Policies Map IHS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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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.

2H1

20421



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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RO1454



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: SUSAN	First name:
Last Name: PRICE	Last Name:
Organisation/company:	Organisation/company:
Address: 281 NEW ST ST HELENS	Address:
Postcode: WA9 3UY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date: 23.3.19
------------	--	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1455



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>HARRY</u>	First name:
Last Name: <u>PRICE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>23 HARRIGOLDWAY</u>	Address:
<u>BOLD</u>	
Postcode: <u>WA9 4EF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1456



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>LYNDA</u>	First name:
Last Name: <u>PRICE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>23 MARIGOLD WAY</u> <u>BOLD</u>	Address:
Postcode: <u>WA9 4EF</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1457

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.

1353
13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: MR
First Name: MARTIN
Last Name: PRILE
Organisation/company: ~~PROPERTY COMPANIES~~

Address: 18 CRAWFORD STREET

Postcode: WA9 4XQ

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____

Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO1458

Representor Details

Web Reference Number	WF0120
Type of Submission	Web submission
Full Name	Mr Bevan Price
Organisation	nil
Address	24 Walmesley Road Eccleston St. Helens Lancashire WA10 5JT
Agent Details	n/a

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1. Government is encouraging councils to adopt policies that reduce pollution. The council policy to encourage lots of warehouse building / distribution centres will bring thousands of additional diesel lorries on to local roads each year, causing a considerable increase in pollution.

2. Converting large amounts of green belt land in Eccleston into "safeguarded for future development" is, I believe, seriously flawed. Even with the suggested revisions to Houghtons Lane, traffic towards St. Helens will be funnelled onto other local roads, e.g. Springfield Lane, Howards Lane (Eccleston) that are totally unsuited to deal with huge amounts of additional traffic.

7. Please set out modification(s) you consider are necessary

1. Look for sensible alternatives to provision of warehouse / distribution centres; consider rezoning some of the proposed areas as suitable for housing rather than industrial use.

2. A large reduction of the amount of green belt in Ecclestone proposed for "safeguarding", Whilst Ecclestone cannot avoid all new building, I suggest a maximum of no more than 100 - 150 houses would be more sensible to avoid unacceptable levels of road congestion & pollution.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 10:34:10 PM
---------------	-----------------------

RO1459

660071



Local Plan Objection HA8 Rookery/Higher Lane, Rainford
 carol P
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 23:44

5/11/8/14
 ① - LPA05
 ② - DLE
 ③ - S.A.

We write to strongly object against release of Green Belt land in Rainford - specifically Rookery Lane / Higher Lane (HA8).

There are no exceptional circumstances in St Helens housing need to justify destroying the green belt - St Helens Local Plan figures do not justify releasing land from the green belt. The predicted population assumption is greatly flawed and can only be a figure plucked out of nowhere. In addition, there has been no amalgamation of the needs of neighbouring areas such as Wigan and Warrington which is deeply concerning.

In reference to the Sustainability Appraisal, the council's own assessment shows that HA8 is the least appropriate site allocated for housing.

There are many areas in St Helens which are not designated as Green Belt and which would benefit greatly from considerate development - the council is not adopting a brownfield first policy and I fear those areas which would be enhanced by development will be left to rot and the chance to improve those areas will be lost forever.

The land at HA8 is next to an industrial area - other sites considered by the council were rejected for being near similar industrial sites.

The land is already used for an important purpose. It is Grade 1 agricultural land which is used to grow food - there are no exceptional circumstances which would warrant a change of use of this land.

The infrastructure of Rainford is already bursting at the seams. The Doctors' Surgeries already have more patients than they can cope with, the schools are full, drainage and flooding is problematic and parking is already extremely challenging in the village.

A more visionary approach to development must be adopted which does not allow the unlawful destruction of this area which is already a complete and attractive successful community. It is the green belt surrounding Rainford which gives it its very identity.

From:
 Carol Pritchard
 David Pritchard
 133 Higher Lane, Rainford, St Helens, WA11 8BJ

Sent from Outlook

RO1460



St. Helens
Council

242

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

01 MAR 2019

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>JANET</u>	First name:
Last Name: <u>PRITCHARD</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>42 SMOCK LANE</u> <u>GARSWOOD</u>	Address:
Postcode: <u>NN4 0SN</u>	Postcode:
Tel No: [REDACTED]	
Mobile N: [REDACTED]	
Email: [REDACTED]	
Signature: [REDACTED]	Date: <u>20/2/18</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LPA05	Site IHA	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I am aware that the population of St Helens has reduced significantly over the last 40 years. This is apparent in the number of schools that have closed in the borough. A living on Smock Lane opposite a Greenbelt site has been a pleasure particularly as wildlife has been allowed to thrive. A large belt of the field has been left fallow each year to allow lapwings to nest and I assume that the farmer has been in receipt of a grant from Natural England, Environmental Stewardship Scheme. The increase of homes (216) isn't sustainable; the field and surrounding roads regularly flood and already take the traffic daily which passes through here wintertime, offset for the way to M60. The local schools and GP are saturated by the current population and there is no significant bus service. The housing will not be required by the current population, it would be highly likely that this would attract pop or work and live outside the borough.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed renewal from
the Greenbelt

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☒ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1461



St. Helens
Council

497

12 MAR 2019

12 MAR 2019

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>George</u>	First name: _____
Last Name: <u>Pyg</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 Lilac Ave</u> <u>Ashton-in-Makerfield</u>	Address: _____
Postcode: <u>WN1 0SL</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____
Signature: _____	Date: <u>3/3/19</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy 1 HS LP A06	Paragraph/ diagram table Borough (Leyland) Green	Policies Map 1	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment			
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>


6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>Safeguarded LAND is unjustified as not required and may not be required in 15 years remain as greenbelt</i></p> <p style="text-align: right;">1</p>	

Remove this LAM
from proposed removal of greenbelt

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy IHA LPAS	Paragraph/ diagram table Smock Lane	Policies Map 	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Brownfield to be used First
Urban sprawl



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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.

RO1462



St. Helens
Council

① - LPA05
② - LPA06
522
12 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)

Title: MR

First Name: CHRIS

Last Name: PYE

Organisation/company: Liverpool John Moores University

Address: 18 RUSSCRO ROAD PAINEFORD

Postcode: WA11 8TX

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 3/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
IHA									
LPAS		Smock Lane							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Local infrastructure - ie Dockton school etc</p> <p>Brownfield Site not considered.</p> <p>Council using own housing figures instead of National Statistics</p>	

①

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete LAND from proposed
Removal for green belt land

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.

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 IHS LPA06	Paragraph/ diagram table Borough Billing	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Safeguarded LAM is unjustified as not required now it may not be sound or required in 15 years should remain Green belt

②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete LAND from proposed
Remove from Greenbelt LAND

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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.

RO1463



St Helens
Council

13 MAR 2019

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>STEPHEN</u>	First name: _____
Last Name: <u>PIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>18 RUFFORD RP RAINFORD</u>	Address: _____
Postcode: <u>WA11 8JX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>9-3-19</u>
------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHA		LPAS		SMOCH LANE			
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Doctors
Dentist
SCHOOLS
TRAFFIC

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 plan from proposed
removal or granted 100

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
115		LP A06		Billinge R					
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Council using own housing figures
Not using Brownfield sites
when numbers are available

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 plan from proposed
removal of green belt 1a)

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1464

1.8 APR 2019

869

32, The Pastures,
ST HELENS,
WA9 4ZB.

Monday 15th April.

Dear Sir / Madam,

Re: Local Plan BOLD

I write to register my objections in the strongest possible terms to the attempted 'land grab' by St Helens Council to remove key areas from Green Belt for housing.

As it stands now, the area of Bold is only just about coping with the amount of traffic in the area and there just isn't the infrastructure to support a huge increase in volume.

On top of that, priceless Green Belt plays a big part in the local area. It appears the Labour run council wants to use Green Belt as a cash cow.

I have little doubt that my comments will end up in the dustbin, but make no mistake - do not underestimate the feelings of local residents against this plan.

Yours faithfully,

Stuart Pyke. —

RO1465

Representor Details

Web Reference Number	WF0375
Type of Submission	Web submission
Full Name	Mrs Anne Quayle
Organisation	
Address	7 Pikes Bridge Fold Eccleston St Helens WA10 5AZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04
Paragraph / diagram / table	Paragraph 4.12.5
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

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I am not in a position to comment on whether the local plan is legally compliant, sound or complies with the duty to cooperate in terms of their correct legal meaning therefore my Yes and No above is based purely on a layman's view. That is, I assume with all the work put into this documentation, it is legally compliant, that you believe it to be sound and to comply with the duty to cooperate otherwise you would not be recommending that it is submitted. However, in layman's terms my concern is that the basis for the future employment plans is not sound and will not lead to the growth that all the other undoubted good objectives the plan sets out to achieve. This was the basis of my objection to the previous draft. I cannot see that large scale storage and distribution will lead to either the number of jobs being generated nor to them being well paid, high value jobs which would enable our young people to stay here and afford to buy all the homes that you have estimated we would need to build to house them. The young people that I know who are staying here are in low paid jobs and those who want a graduate career job are necessarily having to find them outside the borough. There is nothing in the plan that makes me believe there will be good quality jobs for future local graduates who will want to live here and pay council tax and spend their income in the borough. Nor will it attract well paid people to want to come to live and work here.

7. Please set out modification(s) you consider are necessary

I'm afraid I am not aware of how this could be achieved but I feel that somehow we need to include ways to attract quality employers to the area be they in the scientific, high technology manufacture or other areas which are well paid and generate good income for the borough. Only in this way will we require the kind of housing that people can afford to buy and pay the tax income that is needed to run the undoubted problem areas we have in this borough. These are expensive to support such as looked after children, adult social care, housing benefit, etc.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/3/2019 7:05:36 PM
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RO1466



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: TERRY

Last Name: Quinn

Organisation/company:

Address: 16, Manor Road

HAYDOCK

ST. HELENS

Postcode: WA11 0LW

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 25.02.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 SITES 25A 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<u>DONT KNOW</u>
Sound?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

THERE IS NO NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION OR SCALE
 THE RELEASE OF GREENBELT LAND WILL CAUSE REAL HARM TO THE PURPOSE OF GREENBELT
 THE COUNCIL HAS ALREADY RELEASE FLORIDA FARM LAND (SITE 2EA)
 HIGH VOLUME OF TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY ON LOCAL HIGHWAYS
 THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES

①
②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM GREENBELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

/	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

291



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

05 MAR 2019

(For official use only)

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This form has two parts;

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>TERRY</u>	First name: _____
Last Name: <u>QUINN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
<u>RETIRED</u>	_____
Address: <u>16, MANOR ROAD</u>	Address: _____
<u>HAYDOCK</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA11 0LW</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>25.02.2019</u>
-----------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LA05 SITE 24A	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

DONT. Know

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>THE PURPOSE OF GREENBELT IS A BUFFER TO INDUSTRIALISATION AND URBAN SPRAWL.</p> <p>HOUSING IN THIS AREA IS NOT SUSTAINABLE I.E. LACK OF SCHOOLS PLACES DOCTORS SURGERIES PUBLIC TRANSPORT MEANS MORE CARS ON ROADS PROBLEMS WITH ACCESS AND WITH FLOODING ESPECIALLY CHIPSLEY BROOK</p>	

RO1467



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

13 MAR 2019

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: CHRISTINE	First name:
Last Name: QUINN	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 2 GALSTON AVE RAINHILL	Address:
Postcode: L35 0NY	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12/3/19
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

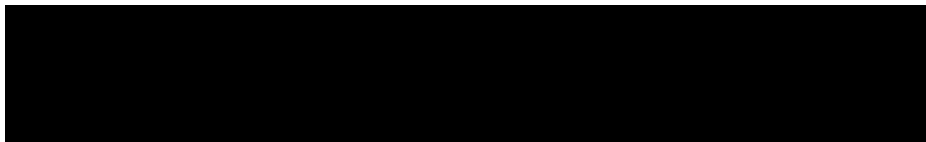
Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:00pm)



or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

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QUIZ
RESPONSE

[illegible]

- We do not understand the need for additional housing as documented in the St Helens Council brownfield register as there is a decline in the local population.
- If the proposed housing goes ahead we believe that it will not only increase the amount of traffic on the A road (Warrington Road) causing congestion but will also impact on all surrounding B and C roads. We do not believe that there is any scope for major road works to support any increase in traffic.
- Any increase in housing in Rainhill will put further pressure on the already oversubscribed local Schools, Doctors and Dentists. Furthermore the local Hospital (Whiston Hospital which is the busiest acute hospital in the Merseyside area) constantly fails to meet government targets for patients to be seen and will experience further failure of government targets should the proposed buildings go ahead. NB neighbouring Knowsley Council also proposes to build a substantial number of houses on the boundary which will also impact on the Hospital.
- We believe that the increase in traffic will also increase local air pollution. It is recorded that between 2013 and 2015 St Helens averaged 51.9 deaths per 100,000 from respiratory disease in the under 75s, compared to 44.3 for the North West and 33.1 nationally, Thatto Heath being the highest effected in the St Helens Borough.
- We are also concerned about the wildlife and flowers in the proposed including 13 that are recorded as protected.
- We are aware that St Helens Council has not yet responded to Sport England, a statutory government consultant, who objected to EPGC being changed from a golf club.

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. It will be helpful if you are able to put forward your

suggested revised wording of any policy or text. Please be as precise as possible.

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination		
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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Please keep a copy for future reference.**

RO1468

166

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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01 MAR 2019
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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ELSIE</u>	First name: _____
Last Name: <u>QUIRK</u>	Last Name: _____
Organisation/company: <u>N/A</u> <u>RETIRED</u>	Organisation/company: _____
Address: <u>4 BROOKSIDE WAY</u> <u>HAYDOCK, ST HELENS</u>	Address: _____
Postcode: <u>WA11 0BP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>25/2/2019</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA -05 SITE- 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW.
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- ONE OF THE PURPOSES OF GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT + OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS.
- HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS, SURGERIES, BUS ROUTES + OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF LACK OF FACILITIES.
- CONCERNED ABOUT INCREASED TRAFFIC IN THE AREA, LEADING TO FURTHER WEAR + TEAR ON ALREADY POORLY MAINTAINED ROADS. BACKUP OF TRAFFIC AT BUSY TIMES FROM HAYDOCK THROUGH BLACKBROOK. ALSO ACCESS ISSUES FROM THE SITE.
- CONCERNED ABOUT ENVIRONMENT + WILD LIFE IMPACT, INCREASED BUILDING WILL CAUSE.

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.

MODIFICATIONS - DELETE THIS LAND FROM PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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RO1469

167

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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01 MAR 2019

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>NORMAN</u>	First name:
Last Name: <u>QUIRK</u>	Last Name:
Organisation/company: <u>RETIRED</u>	Organisation/company:
Address: <u>4 BROOKSIDE WAY</u>	Address:
<u>HAYDOCK</u>
<u>ST. HELENS</u>
Postcode: <u>WA11 0BP</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>25/2/19</u>
-----------------------	----------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Policy	LPA -05 SITE- 2HA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is 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.	
<p>NOT JUSTIFIED THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF POPULATION ESTIMATES POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981 HOUSING ISNT SUSTAINABLE. LACK OF FACILITIES BUSES, SCHOOLS, MEDICAL TRAFFIC. BASSETT JUNCTION</p> <p>TRAFFIC - INCREASE IN THROUGH ASH PARK ROAD - M6/ ACCESS TO PROPOSED SITE IN ADEQUATE. FLOODING. HAS STEPS BEEN TAKEN TO MANAGE THE PROBLEM.</p> <p>DELETE THIS LAND FROM PROPOSED REMOVAL FROM GREENBELT</p>	

Please continue on a separate sheet if necessary

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DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE 'GREEN BELT'

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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RO1470



St. Helens
Council

683
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Sharon	First name:
Last Name: Railton	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Rookery Lane Rainford, St Helens Merseyside	Address:
Postcode: WA11 8EF	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.03.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☒ (Via Email)

No ☐

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Other documents (please name document and relevant part/section)							

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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Consistent with National Policy?	<input checked="" type="checkbox"/>

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Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses

Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

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Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

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underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1471



St.Helens
Council

706

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name <u>HOWARD</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

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.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.	
The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):	
a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.	
b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';	
c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.	
d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

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Policy LPA04 Strategic Employment Sites

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Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

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Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	<input type="checkbox"/>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

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WF0037

① LPA01

④ LPA04

⑦ LPA05.1

② LPA02

⑤ LPA04.1

⑧ LPA06

③ LPA03

⑥ LPA05

⑨ LPA07

Representor Details

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA

1.7.2 DHC

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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

②

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore 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 and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

1.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

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The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPPO) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is been allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly. What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses

Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the

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housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers. The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land.

There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact. Adequate affordable, or low cost housing should be provided to cater for lower income households. The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

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Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate. Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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 4:27:25 PM
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SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

Representor Details

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
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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3. To which part of the Local Plan does this representation relate?

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J) Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

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Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing. Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1. It is therefore logical that this should be the first site Green Belt site released from development if the housing need is reduced. We are arguing that the Council should use the Standard method of 468 rather than the uplifted 486, which over 19 years equates to 342 fewer houses. This comfortably exceeds the 259 houses planned for site 8HA

4.2 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.

4.3 The site is Grade 1 Agricultural Land and is some of the most fertile land in the Country. Just 2.7% of the surface area of England is as Grade 1 Agricultural Land. It is actively farmed, providing 2 crops per year and employment in the agricultural sector. These jobs are threatened by the proposed removal of this site from the Green Belt. Housing in close proximity to the Industrial Area will limit future activity and expansion of this site, due to health, safety and amenity concerns. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of

land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate. Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

Site 8HA is close to two accident blackspots in Rainford at either end of Mill Lane and traffic from this site will inevitably pass through one or other of these junctions on the way to/from St Helens.

The site 8HA promotes biodiversity and sustains wildlife. Building will destroy habitat and reduce biodiversity. Mitigation is not properly addressed in the Plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/13/2019 1:53:32 PM

RO1473



St. Helens
Council

723

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name <u>GARY</u>	First name:
Last Name: <u>RALTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>DONTONS GREEN,</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guesstimate figures bear no resemblance to this fact.

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Policy LPA05.1: Strategic Housing Sites

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Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1474



St. Helens
Council

724

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>LEWIS</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>PONTONS GLEEN</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

02/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☒ (Via Email)

No ☐

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Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
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Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.</p>	

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In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No , I do not wish to participate at the oral examination		
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

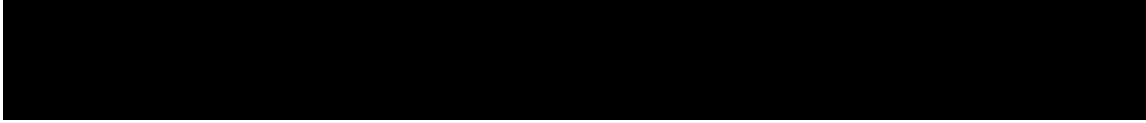
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1475



Local plan
Cheryl Rank
to:
planningpolicy@sthelens.gov.uk
11/03/2019 14:46



1 Attachment



lpsd-representation-form CR.doc

Sent from my Samsung device

----- Original message -----



Date: 11/03/2019 2:44 pm (GMT+00:00)



Subject: lpsd-representation-form CR



St Helens
Council

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Cheryl	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
[REDACTED]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes x (Via Email)

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	x	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	x
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	No x <input type="checkbox"/>	
Sound?	No x <input type="checkbox"/>	
Complies with the Duty to Cooperate	No x <input type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> x no the plan is based on flawed methodology
Effective?	<input type="checkbox"/> x no the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> x no it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Does not satisfy:-</p> <p>The requirement for sustainable development.</p> <p>The criteria for sustainable transport – promoted increased car dependency.</p> <p>Sustainable housing, based on aspirational employment growth predictions.</p> <p>Effective land use by concentrating on green space over town centre development and brownfield.</p>	

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. (1)
- Adequate regional and cross border collaboration has not been undertaken. (3)
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. (1)
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. (1)
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor [REDACTED] submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. (4)
- Council statement of "contaminated land sites" [2-15] indicated that 3,710 ha of lowest priority contaminated land exists in St Helens. Two green belt sites of 56.6. ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170 ha available if it were to be remediated. There are numerous empty properties in the borough and buildings that can be changed to residential use. There are areas of land that had residential properties on yet have not been redeveloped, eg Eccleston Street. (4)
- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. (4)
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)
- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be (4)
(2)

suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane.] ②

- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Eccleston and rail links are either in town centre or in Sutton. [REDACTED] Liverpool City Region Metro Mayor [REDACTED] speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : [REDACTED] Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."*] ②
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed.] ②

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only

interested in large scale, easy to clear land.

To promote local businesses council should commission local building/developing companies to establish local consortiums to develop on the smaller pockets of land.

Those sites that remain undeveloped should be made to finish the project.

Council should continue with projects to develop town centre development/change of use in tandem with it's plan for St Helens transforming our town to have more central living as the high street changes.

When the greenbelt is gone it is gone forever, changing the landscape of the area, there is no need for this.

Plan based on aspirational growth due to the new warehousing being built along the A580, these jobs are often lower paid, whereas building on 8HS is purely to make it easier for large developers to build high priced housing bringing in higher rates to the council and not social housing. Many people cannot get on the property ladder and these developments would not always be in the reach of some people. Demolish the old Tax office in College Street, this is an eye sore and would free up more land that can be used for housing.

Unsafeguard the 8HS site and keep it as agricultural land.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1476



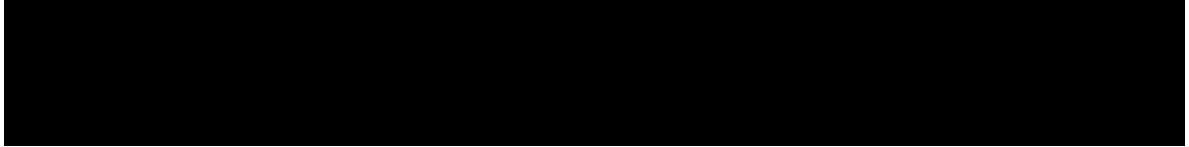
lpsd-representation-form CR

Richard Rank [REDACTED]

to:

planningpolicy

11/03/2019 15:27



1 Attachment



lpsd-representation-form CR.pdf

[REDACTED] has attached the following document:



lpsd-representation-form CR

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



Site 8HS

Ef0020

EMBED
MSPhotoEd.
3

- ① - LPA05
② - LPA06
③ - DEC
④ - GEN

Ref: LPSD

(For official use only)

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Richard	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
Address: 94 St Georges Avenue Windle	Address:
Postcode: WA10 6HD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: [REDACTED]
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open
Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	x	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	x
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?		<input type="checkbox"/> b x
Sound?		<input type="checkbox"/> b x
Complies with the Duty to Cooperate		<input type="checkbox"/> b x

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> no the plan is based on flawed methodology
Effective?	<input type="checkbox"/> no the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> no it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Does not satisfy:-	

The requirement for sustainable development.

The criteria for sustainable transport – promoted increased car dependency.

Sustainable housing, based on aspirational employment growth predictions.

Effective land use by concentrating on green space over town centre development and brownfield.

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. (1)
- Adequate regional and cross border collaboration has not been undertaken. (3)
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. (1)
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. (1)
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. (4)
- Council statement of "contaminated land sites" [2-15] indicated that 3,710 ha of lowest priority contaminated land exists in St Helens. Two green belt sites of 56.6. ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170 ha available if it were to be remediated. There are numerous empty properties in the borough and buildings that can be changed to residential use. There are areas of land that had residential properties on yet have not been redeveloped, eg Eccleston Street. (4)
- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. (4)
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)

- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be suitable to have direct access from dual carriageway or Houghtons Lane which is a narrow country lane. (4) (2)
- Increase in traffic resulting from proposed plan will have a negative impact on air quality, noise, tranquillity and general health. Fails to promote being less vehicle dependent. There is a reduced bus services in Ecclestone and rail links are either in town centre or in Sutton. Steve Rotherham, Liverpool City Region Metro Mayor, Steve Rotherhamd speaking ahead of the National Clean Air Summit 20/6/18 said *"Air pollution is no respecter of boundaries so it is vital that we have concerted action at a national level to effectively tackle an issue which has such an impact on our people's health and quality of life. In some parts of our city region, men can expect to die seven years earlier than the national average"*. : Nathalie Nicholas, Deputy Portfolio Holder for Transport and Air Quality for the Combined Authority, and Deputy Chair of Liverpool City Council's Social Care and Health Select Committee also commented at the summit that *"By the government's own admission, poor air quality is the largest environmental risk to the public's health, contributing to respiratory and cardiovascular disease and, over the long-term, lung cancer."* (2)
- Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. [REDACTED] practice closed it's books to new patients and others are also over subscribed. Most schools in the area of Ecclestone and Windle are already oversubscribed. (2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should encourage development of brownfield sites and other smaller sites rather than selling off high grade agricultural land to the large developers who are only interested in large scale, easy to clear land.

To promote local businesses council should commission local building/developing companies to establish local consortiums to develop on the smaller pockets of land.

Those sites that remain undeveloped should be made to finish the project.

Council should continue with projects to develop town centre development/change of use in tandem with it's plan for St Helens transforming our town to have more central living as the high street changes.

When the greenbelt is gone it is gone forever, changing the landscape of the area, there is no need for this.

Plan based on aspirational growth due to the new warehousing being built along the A580, these jobs are often lower paid, whereas building on 8HS is purely to make it easier for large developers to build high priced housing brining in higher rates to the council and not social housing. Many people cannot get on the property ladder and these developments would not always be in the reach of some people. Demolish the old Tax office in College Street, this is an eye sore and would free up more land that can be used for housing.

Unsafeguard the 8HS site and keep it as agricultural land.

Please continue on a separate sheet if necessary

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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RO1477



St. Helens
Council

424

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

12 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

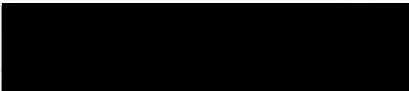
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>NORTHERN TRUST LAND EXEC</u>
First Name: <u>BARBARA</u>	First name: <u>STEPHEN</u>
Last Name: <u>RATCLIFFE</u>	Last Name: <u>GLENN</u>
Organisation/company: <u>LAND OWNER</u>	Organisation/company: <u>NORTHERN TRUST</u>
Address: <u>3 ALL SAINTS COURT</u> <u>RAINFORD</u> <u>ST HELENS</u>	Address: <u>LYNTON HOUSE</u> <u>ACKHURST PARK, CHORLEY</u> <u>LANCS</u>
Postcode: <u>WA11 8QW</u>	Postcode: <u>PR7 1NY</u>

Signature: 	Date: <u>11th March 2019</u>
--	---

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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for each separate comment/representation.**

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment ON LWS 90	✓
Other documents (please name document and relevant part/section)				SITE AT REAR OF 524 FLEET LANE, PARR ST. HELENS WA9 2NB					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
SEE ATTACHED SHEET

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Item 6

When the local plan was proposed for consultation in December 2016 the piece of land that I own with my family was proposed as a LWS90.

My husband went into the planning office in early January 2017 to object to taking the land for a wildlife site. A meeting was arranged between my husband and my cousin [REDACTED] with your council representative [REDACTED]. He gave us a paper indicating that the site has been designated since 2003 as a wildlife site.

In discussions he stated that St Helens Council might consider taking it out if we could find 22 acres that could be designated as a wildlife site. He also stated that St Helens Council would take a dim view if we did any work on the site and told us we would have to get our own surveys done. Considering we are the legal owners of the land and we have letters from the council regarding the land, but there was never any mention or more importantly formal notice from SHMBC confirming designation of my property as a wildlife site.

At no time in 2003 or any time after that have the council or their agents, either formally or informally, informed the owners about the wildlife designation or asked permission to go on the site and undertake surveys of any kind. I would raise serious questions as to whether or not any surveys have ever been undertaken on behalf of SHMBC and furthermore whether or not a management plan has ever been prepared or implemented. It should be noted that at no time during the last 16 years has permission to enter the land been requested by anyone purporting to act on behalf of SHMBC.

Since the end of January 2017 our agents have been putting proposals to St Helens Council and have carried out all the necessary surveys. These are totally different to what St Helens Council has proposed.

My information from the consultants has been forwarded under separate cover with their information and results. The only time we have received any co-operation from St Helens Council is in the last couple of weeks from [REDACTED] [REDACTED].

I honestly think the way our objection has been dealt with by St Helens Council has been unfair. Even up to the end of February the details of the wildlife site we are objecting to has not been on the website. Surely this should have been on the website at the beginning of the consultation.

In conclusion I am of the opinion that over the last two years our consultants and I have put a lot of time, effort and money into trying to resolve this issue. The costs to date are approx. [REDACTED]. St Helens Council have totally ignored our findings and based their results on one A4 sheet of paper that says a survey was carried out in 2003. There has been no monitoring or up to date information obtained. St Helens Council has still gone forward in their 2019 proposals designating the site as a wild life site.

This has caused problems as certain members of the Council will not speak to me about it. They are taking St Helens Council version to be correct.

It currently feels as if St Helens Council are trying to acquire the land by stealth , possibly for the purposes of extending the adjacent Bold Forest designation at no cost to them.

Item 7

If item 6 is accepted surely it would be prudent to consider taking the land out of green belt because it is not contributing or fulfilling any of the basic greenbelt objectives or tests.

Such a move would enable the footpath to be completed to the Bold Forest , provide opportunities to create and enhance nature conservation and in addition it would stop the very real problem of local people using the land as a rubbish dump and as area for other anti-social uses.

Item 9

As of yet St Helens Council have not given us satisfactory proof that the area should be designated as a wildlife site. Their information is at least 16 years old, out of date, and they are ignoring current professional ecological surveys prepared over the last 2 years.

RO1478



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title:
First Name: <u>EDWARD</u>	First name:
Last Name: <u>RATCLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>3 All Saints Church</u>	Address:
<u>Rainbow</u>
<u>St Helens</u>
Postcode: <u>WA11 8QW</u>	Postcode:
.....	Tel No:
.....	Mobile No:
.....	Email:

Signature:	Date: <u>11 March 2019</u>
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☒ Yes (via email)

☐ No

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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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①

Why I believe the proposed site for housing is totally perceived in St Helens Local Plan to be flawed.

① The site

- a Is next to existing industrial estate
- b Is next to a proposed new area for industrial use
- c The site should be used as a sound barrier which it has been for years to protect Higher Lane, Rockery Lane and the Rockery estate from sound from the existing industrial estate & the proposed new industrial estate
- d There has been a case in recent years that the residents on Higher Lane won an injunction against a manufacturing unit on the industrial unit which caused the business to relocate losing employment to the area
- e If the residents of the new homes started complaining about noise which some of the factories work 24hrs per day & they won an injunction on restricted hours would this not reduce employment in the area.
- f If there was a fire at any of the units which there has been in the last 12 months which was declared a major incident would it not affect the homes which were built near them
- g The site now is providing work for the local people & redundancies would have to be made at the local farm that is farming the field
- h The land is grade 1 agricultural land & once its gone they are not growing anymore food. It is government policy to grow our own
- i Once the land is taken for housing it cannot be replaced
- j The site is not far from holiday moss tip

2 Public Transport

- @ St. Helens - Buses every hour
 Ormskirk - No bus service
 Liverpool - No bus service
 Warrington - No bus service
 Wigan - No bus service
 Kidderley - No bus service
 Railways - No Station

③ Schools

- a Rainford CE No extension can be made without taking playing fields
 b Corpus Christie - ditto
 c Brook Lodge - ditto
 d Rainford High School can only be extended by taking Grade 1 agricultural land

④ Health Service

- a McCrea Medical Centre cannot be extended or car park restrictions
 b Higher Lane Medical Centre - ditto

⑤ Police

They are selling Police Station off there is no police station

⑥ Fire Service

The nearest fire station in Eccleston is being relocated to the centre of St. Helens

7. Road Transport in + out of the village

① From Rookery Lane there is a bad junction at the intersection of Rookery Lane + Church Road & to get to the Rainford Bypass you either have to go up through the village or through the one way system in Thickwood Moss + a difficult junction with Mossborough Road.

② Getting back into the village there are difficult junctions between Mossborough Road + Church Road + Rookery Lane + Church Road. Also if you come in the other way from Mill Lane there is a difficult junction between Higher Lane + Mill Lane.

If you come into Rainford via Pasture Lane it is a difficult junction crossing the Rainford By Pass there has been many accidents there.

③ There is no footpath on one side of Rookery Lane + there is a bad junction at the corner of Pottery Park

⑧ Drains

The drainage system in both Rookery Lane + Mill Lane is not adequate to take any more new houses because in heavy rain the man hole covers have been seen lifting.

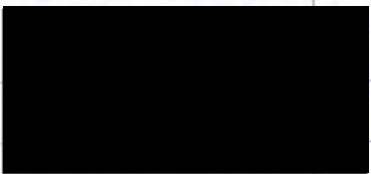
⑨ Parking in the village

Inadequate car parks to take any more vehicles

⑩ Why I believe St. Helens is wrong to accept this site

There are other sites in the borough that have not been taken out of the green belt that are not producing crops + providing employment

I believe this site has been chosen in Rainford to get extra rates



RO1479



St. Helens
Council

493

12 MAR 2019

Ref: LPSD

(For official use only)

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Title: <u>MR</u>	Title:
First Name: <u>CHRISTOPHER</u>	First name:
Last Name: <u>RATCLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>296 SCOT LANE</u> <u>WIGAN</u>	Address:
Postcode: <u>WNS 9TA</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>5-3-19</u>
--	---------------------

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

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Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

ROAD Congestion / Traffic fumes
Farming LAND
USE Brownfield Sites

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove 1c2 from proposed
removal from greenbelt

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
1H S		LPA06		Billinge B					
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
--

Farming LAND
WildLife

⑦ Remove 1a from proposed removal
from Greenbelt

RO1480

848

①-LPA05

②-LPA06

PF0783

13 MAR 2019

Ref: LPSD

(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>CAROLINE</u>	First name:
Last Name: <u>RATCLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>40 Cansfield Street</u> <u>St Helens</u>	Address:
Postcode: <u>WA10 1LY</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>12/03/19</u>
--	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy IHA LPA5 Smock Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Plan DOES NOT prevent urban sprawl</p> <p>Trunk problems / Smock Billinge B</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete IAS from paper
remove of greenbelt 12

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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 IHS	Paragraph/ diagram table LPA 06	Policies Map Billinge R	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Plan does not satisfy policy framework in
Section 13 (protecting greenbelt).
Wildlife - Losing habitats

(2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete 14th from envelope of
green belt 12

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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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.

RO1481



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

1158

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: NEIL	First name:
Last Name: RATCLIFFE	Last Name:
Organisation/company:	Organisation/company:
Address: 33 CRAWFORD ST ST HELENS	Address:
Postcode: WA9 4XG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 16-4-19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1482



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: SUSAN	First name:
Last Name: RATCLIFFE	Last Name:
Organisation/company:	Organisation/company:
Address: 33 CRAWFORD ST ST HELENS	Address:
Postcode: WA9 6XQ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 16-4-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1483



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Sheila	First name:
Last Name: Rattigan	Last Name:
Organisation/company:	Organisation/company:
Address: 559 Clock Face Road Bold, St. Helens	Address:
Postcode: WA9 1LU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date:

23rd March 2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1484



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JAMES	First name:
Last Name: RATTIGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 559 CLOCK FACE ROAD BOLD, ST. HELENS	Address:
Postcode: WA9 4UQ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date:

23-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1485

Representor Details

Web Reference Number	WF0052
Type of Submission	Web submission
Full Name	Miss Amy Rawsthorne
Organisation	
Address	21 Hamilton Road Garswood Nr Wigan WN4 0SU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA06 - Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I do not know if this plan is considered legally compliant. However, i feel the plan for additional housing on this site is not justified. The population of St.Helens has been in decline since the 80's and the council should provide strict and transparent proof of its population estimates to justify this development.

Greenbelt land is precious to the community. Taking away the protection of our playing fields and green spaces will have a significant impact on the lives of many local residence who use these spaces. The purpose of protected greenbelt land is to encourage developers to use derelict land from previous industry etc. Stripping our protected land for development undermines this attempt to recycle previously developed land.

I feel that housing in this area is unsustainable due to the fact we have been stripped of many facilities. For example, [REDACTED], i am surprised that there is no dental practice in Garswood. On top of that we only have a handful of shops, one school, an unreliable bus and train service. Adding to the population of the area would only exacerbate these problems.

I also feel that access is another issue. Traffic around this area is usually heavy and fast. I do not feel that additional vehicles on this road would improve this situation. Billinge road is one of the fastest roads in the vicinity, which is not currently helped by lack of facilities. I find this to be an unsafe road to cross with the current traffic and i do not feel that increased traffic will improve this situation.

Personally, i cannot see a way in which this access could be improved, and feel that any changes to improve access must be funded by the developer, not the tax payer.

Lastly, as a local resident who was born and raised in Garswood, i find it sickening that my council is looking to add more houses int he area, [REDACTED]

[REDACTED] This housing will not be affordable or beneficial for the village in any way. I have also worked very hard in recent years to attract wildlife to my garden, and have offered to assist councilors in their plans for planting wildlife flowers etc to encourage more habitats for wildlife. Taking our greenbelt stops these efforts.

7. Please set out modification(s) you consider are necessary

Delete this land from proposed removal from the greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 3:26:35 PM
---------------	----------------------

Representor Details

Web Reference Number	WF0054
Type of Submission	Web submission
Full Name	Miss Amy Rawsthorne
Organisation	
Address	21 Hamilton Road Garswood Nr Wigan WN4 0SU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LAP05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I do not know if this plan is considered legally compliant. However, i feel the plan for additional housing on this site is not justified. The population of St.Helens has been in decline since the 80's and the council should provide strict and transparent proof of its population estimates to justify this development.

Greenbelt land is precious to the community. Taking away the protection of our playing fields and green spaces will have a significant impact on the lives of many local residence who use these spaces. The purpose of protected greenbelt land is to encourage developers to use derelict land from previous industry etc. Stripping our protected land for development undermines this attempt to recycle previously developed land.

I feel that housing in this area is unsustainable due to the fact we have been stripped of many facilities. For example, [REDACTED] i am surprised that there is no dental practice in Garswood. On top of that we only have a handful of shops, one school, an unreliable bus and train service. Adding to the population of the area would only exacerbate these problems.

I also feel that access is another issue. Traffic around this area is usually heavy and fast. I do not feel that additional vehicles on this road would improve this situation. Smock lane is usually congested and slow due to the amount of off road parking and i feel this causes a lot of current vehicles to use the faster roadways in the vicinity, which is not currently helped by lack of facilities. Personally, i

cannot see a way in which this access could be improved, and feel that any changes to improve access must be funded by the developer, not the tax payer.

Lastly, as a local resident who was born and raised in Garswood, i find it sickening that my council is looking to add more houses int he area, [REDACTED]

[REDACTED] This housing will not be affordable or beneficial for the village in any way. I have also worked very hard in recent years to attract wildlife to my garden, and have offered to assist councilors in their plans for planting wildlife flowers etc to encourage more habitats for wildlife. Taking our greenbelt stops these efforts.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 3:21:37 PM
---------------	----------------------

RO1486



{In Archive} St Helens Local Plan 2020-2035 Submission Draft & Parkside Planning
Application P/2018/0048/OUP
john.rea@mail.com
to:
planningpolicy@sthelens.gov.uk
27/01/2019 20:32



Dear Sir / Madam,

Please accept this email as formal representation and objection regarding the plan and also regarding the potentially misalignment between the plan and the most recent Parkside Planning application.

I have grave concerns regarding the plan and the content that entails the Parkside redevelopment.

I have recently received draft plans for the Parkside development (16th Jan 2019) and it seems there is serious misalignment between the plan and the revised plans. I have grave concerns also with the previous planning application but now it seems as if the stories are not aligned and hence you are perhaps not making the best and most informed decisions.

In the plan it mentions all the merits of the rail freight terminal, in the recent planning application, the rail freight terminal is actually at risk and might not happen. This would seriously put additional HGV load on the area. The most recent planning application also omits previous road extensions to help with HGV volumes but now this is not proposed to be the case and all traffic would pass through local residential areas. Surely this is not something ST Helens council would wish as you would potentially drive residents out of St Helens into other areas given your plans to industrialise your town and villages without any consideration for health, safety, shrinking your revenues due to residents relocating etc.

I have the following concerns I would like you to consider and factor into your plan and the specifics regarding Parkside regeneration :-

- Your plan does not seem aligned and in fact is potentially contradictory to planning applications. You might therefore be advertising / making decision on something that is incorrect and potentially leave you open to legal duress against you.
- FUMES & EMISSIONS The A49 is already a busy road, this development would greatly increase the traffic flow. An increase in traffic fumes (as well as any emissions from the actual planned facility) would be considerable and would have a detriment to local residents, children and wildlife.
- TRANSPORT This proposed development would drastically increase the traffic volume through built up residential areas including the high street. Surely any development cannot be approved that initially only has access and will increase traffic radically through residential areas. The residential areas should remain sacrosanct and even for phase one, bespoke access needs to be incorporated that does not impact existing residential areas.
- HGV's AND SAFETY As above, the increased traffic volume based on current plans greatly increases the risks of accidents and potential Road Traffic deaths but channelling HGV's through the high street and the surrounding residential areas! This surely cannot be an acceptable factor to increase the

dangers to local residents by channelling significant additional volumes of HGV's through residential areas. Again, an alternative bespoke and mandatory access to the site needs to be included even as phase one of the development to prevent the council increasing the dangers on our roads to local residents.

- **NOISE & ROAD MAINTENANCE** The A49 has seen increased HGV use in recent months as the new train station is developed as this understandably requires commercial vehicles to access the site whilst construction is happening. Now this is near completion, the new consumer traffic that will utilise the park and ride station needs to be built into forecasts it will be a double whammy of additional cars and additional HGV's. The Road noise to ourselves has increase radically because of the increased volume of HGV's but also because the road surface has become potted and deteriorated very quickly given the increased usage by HGV's. With the planned development only having initial access via the A49, this would increase this problem and make it a continual problem for residents which would be unacceptable hence alternative bespoke and mandatory access to the site needs to be included even as phase one of the development that avoids using the A49. The plans show that this is planned for later phases but this needs to be the day 1 solution to prevent problems on the A49
- **PENNINGTON DRIVE ACCESS** Turning out of Pennington drive onto the A49 is already a challenge given the high usage of the A49 by traffic. This is especially true turning right towards Winick as this is somewhat of a blind corner. Serious consideration should be given to this junction as part of the planning application as by increasing traffic flow (HGV's and Cars) will make this junction a bottle neck and with HGV's this will create a real road safety issue given the increase stopping distances of HGV's when they would be coming around the blind bend on the junction of A49 & Pennington Drive heading towards Newton as this will be the preferred route for any vehicles wanting to head northbound on the M6 likely. So consideration should be given to this blind corner as this could be a real Road Traffic Accident Black Spot without the introduction of control lights etc. to cope with any additional HGV traffic.
- **PARKING** We already experience parking issues with people leaving cars on Pennington Drive to use the local train station. Any additional development would increase the potential parking problems if staff at the new development don't have an excess of parking at the facility. Residential parking permits / zones should be considered to mitigate this issue for all neighbouring residential areas impacted.

If you require any further explanation or wish to discuss these points, please do not hesitate to contact myself via the contact details below. Thank you for considering these factors that would impact us as local residents and our neighbourhood and that creates additional significant dangers [REDACTED]. I am sure you would not want this to be the headline of your local plan

Kind regards,

John

John Rea
4 Pennington Drive
Newton Le Willows
St Helens Council
WA12 8BA

RO1487



St. Helens
Council

370 33

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARILYN	First name:
Last Name: REA	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 182 TWO BUTT LANE RAINHILL, PRESTON MERSEYSIDE	Address:
Postcode: L35 8PT	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

06/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

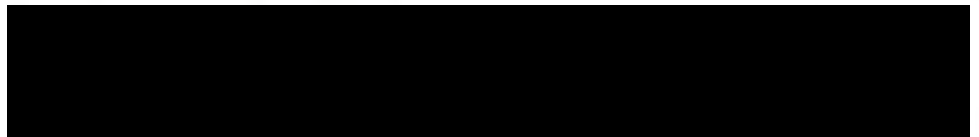
Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:00pm)



or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

• We believe the local Plan to be unsound because of the increased traffic that will be generated on already massively congested roads around the Eccleston Park Golf club site.

• we feel because we live so close, on the boundary of the Golf Course, that we have first hand experience of the amount of traffic using all the surrounding roads have and will increase, especially at rush hour, am and pm, School traffic, hospital visiting hours, all of this impedes on very very busy and congested roads already

• There is limited parking around this area as it is and with parked cars and residents cars, driving on all roads in the area and surrounding areas is becoming a massive problem.

• There has in recent months been 3 new building developments in Scotchburn Lane, which is the continuation of

Please continue on a separate sheet if necessary

Two Butt Lane, this has already had a massive impact of increased travel and is now becoming very time consuming

please see attached sheets
1-#

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your

on trying to exit Two Butt Lane onto Delph Lane.

• It is becoming a danger hazard for us as pedestrians walking up Two Butt Lane as traffic is increasing and drivers come very close to kerbside, so with more cars using the lane this problem will only magnify and increase risk to life.

• In our opinion we believe that the infrastructure is already at breaking point in the area with regards to traffic and pollution, and we do not believe that the increase in traffic that this Local Plan is suggesting will be sustainable.

• As local residents [REDACTED] in our experience we feel that our local

2

Hospitals cannot cope with the increase of population. We have experienced first hand when much awaited hospital appointments have been cancelled because the hospital can't cope so where is the reasoning behind an increase in local residents being slotted into an already struggling NHS.

As residents

[REDACTED] we feel that flooding will become a future massive problem. As residents [REDACTED]

[REDACTED] are experiencing flooding already. Some of our homes are below the road so we have severe flooding with heavy rain and in our opinion we feel houses opposite our homes will only increase the risks of more serious flooding.

3.

'We believe that we need 'Green Belt' for our health and well being, to breath clean air, to walk with nature.

If this "Urban Sprawl" is allowed to continue, then it will be gone forever.

- We are all aware of the implications of Halshead Garden Village and how it will impact the local area, it will be impossible to get to anywhere in a timely manner because of the amount of traffic that will for sure bring the surrounding roads to a stand still.

- We have all experienced problems travelling around Rainhill and Eccleston Park, especially friends and family who are very frustrated

4

in battling traffic and queues
now with out hundreds potentially
thousand more cars.

It is becoming difficult parking
in and around Rainhill and
Surrounding areas becoming
like travelling around a
City Centre !!!

SAVE OUR

GREEN BELT

PLEASE

suggested revised wording of any policy or text. Please be as precise as possible.

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	
--------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

1. NAME PHILIP REA..... PRINT NAME PHILIP REA.....

ADDRESS [REDACTED]

DATE 06/03/2019.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Amy Holding..... PRINT NAME Amy Holding.....

ADDRESS [REDACTED]

DATE 7/3/19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME N Holding..... PRINT NAME N Holding.....

ADDRESS [REDACTED]

DATE 07/03/19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME P.J. McGOWAN..... PRINT NAME PAUL JERRY MCGOWAN.....

ADDRESS [REDACTED]

DATE 10/03/2019.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

RO1488

①-LPA05, 2HA

Page 1 of 1

EFO040



Fwd: lpsd-representation-form
susan redman
to:
planningpolicy@sthelens.gov.uk
12/03/2019 14:59



1 Attachment



lpsd-representation-form.doc

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Sue Redman [REDACTED]
Date: 12/03/2019 14:57 (GMT+00:00)
To: [REDACTED]
Subject: lpsd-representation-form

Sue Redman

19 Clipsley Crescent

Haydock

St Helens

Merseyside



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Susan	First name:
Last Name: Redman	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Clipsley Crescent, Haydock	Address:
Postcode: WA11 0UH	Postcode:
	Tel No:
	Mobile No:
	Email:

Date: 12.3.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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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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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LPA05									
Site									
2HA									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> Don't know
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	☐✓
Justified?	☐✓
Effective?	☐✓
Consistent with National Policy?	☐✓

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified – the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

Housing in this area isn't sustainable because of lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged due to lack of facilities.

Access to site – extra volume of traffic in an already congested area. Daily traffic congestion reports on local Radio re traffic along Stanley Bank Road.

No evidence of extra housing being required, numerous houses for sale in this area.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsley Brook.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed remove from the Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

√	No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1489



Fwd: lpsd-representation-form (SR)

susan redman

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:23

Hide Details

From: susan redman [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

EF0041

1 Attachment



lpsd-representation-form (SR).doc

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Sue Redman [REDACTED]

Date: 12/03/2019 15:18 (GMT+00:00)

To: "[REDACTED]"

Subject: lpsd-representation-form (SR)



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Redman	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Clipsley Crescent, Haydock	Address:
Postcode: WA11 0UH	Postcode:
	Tel No:
	Mobile No:
	Email:

Date:

12.3.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LPA05	①						
Site							
2HA							
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> Don't know
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Access to site – extra volume of traffic in an already congested area. [REDACTED]
[REDACTED] and on a daily basis have to cope with the delays caused by the amount of traffic around this area.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

Not justified – the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

Housing in this area isn't sustainable because of lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged due to lack of facilities. A neighbour who has no transport already has to walk nearly 6 miles daily to take [REDACTED] to school and this is the same area of the proposed housing so where will these extra school places be available.

There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsley Brook.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed remove from the Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

√	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider

this to be necessary:

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.

RO1490



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019
1306

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JOANNA	First name:
Last Name: REES	Last Name:
Organisation/company:	Organisation/company:
Address: 16 BEGONIA GARDENS NEW BALD	Address:
Postcode: WA9 4FT	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [Redacted]	Date: 27 / 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.

RO1491



St. Helens
Council

①-LPA05

②-LPA06

524

12 MAR 2019

PFO477

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: KONSTANTINOS

Last Name: RENTONIS

Organisation/company:

Address: 4 KESWICK RD

WALKDEN - WOLSELEY

MANCHESTER

Postcode: M26 3H7

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 5/3/19

Please be aware that your comments will only be considered if you complete this form and return it to the Council.

Accepted and that in order for your comments to be

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy <i>IHA Policy</i>	<i>LPA5</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>Brownfield site to be used 1st</i></p> <p><i>Housing numbers incorrect -</i></p> <p><i>Doctors / Dentist School.</i></p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete LAND from proposed removal from
greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <i>IHS</i>		Paragraph/ diagram table <i>LPA06</i>		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>Farming LAND</i></p> <p><i>Housing figures incorrect</i></p>	

②

⑦ Delete LAND
From proposed removal from
Greenbelt

RO1492

Representor Details

Web Reference Number	WF0210
Type of Submission	Web submission
Full Name	Councillor Rob Reynolds
Organisation	
Address	10 The Spinney, Rainford, Lancashire WA11 8AS
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	All
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**Legality of the plan**

In page 2 of the council's guidance on this form (https://www.sthelens.gov.uk/media/9460/lpsd-representation-form_guidance-note.pdf) under the heading "Legal compliance and duty to cooperate" they say that "The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI)".

The SCI is available here: <https://www.sthelens.gov.uk/media/3195/statement-of-community-involvement-november-2013.pdf>

The SCI says that "evidence gathering" and "community involvement" must precede the decision to adopt the plan; however I believe that the Councillors in charge of the process had made their minds up before the consultation began. I believe this can be demonstrated by consideration of the facts. The consultation was announced shortly before Christmas and ran over the Christmas break, this made press coverage and opposition difficult. Despite this the council was obviously overwhelmed by the response. This is evidenced by their repeated failure to meet their own deadlines.

At the beginning of the local plan process St Helens Council did not have a brown field register and when pressed to prepare one by opposition councillors they refused saying they did not need one. They have since been forced to prepare one by the government, but again I think this shows that the minds of the councillors in charge of the process were made up before the consultation even began. They wanted more council tax and business rates and they had an overwhelming majority on the council to force this through, evidence was unnecessary and greenbelt land was expendable.

01

Senior Councillors from the ruling group have made numerous statements which suggest that their minds were made up prior to the consultation. One example is the comment by the then leader of the council on 1/05/2017 that one group of residents opposing the plan were "#nimbys". Bizarrely this comment was posted at 1.40am. Cllr Grunewald said that "As I say you are #nimbys it's ok to build just not in my back yard." While this was after the consultation I believe this makes his mindset and his attitude to the plan and to disagreement with it very clear.

Councillor Grunewald went on to say that "People forget that as a council we have had £90m cuts. We must do something to bring in money. I support jobs and investment any day over nimbyism." In my view the reference to the reduction in the council's central government grant shows that his principle interest was in generating a greater income for the council from council tax and non-domestic rates. While this is not an unreasonable position for him to take it is not one that justifies the release of large areas of greenbelt land. His comments can be read here:

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

On page 12 of the SCI at paragraph 3.5 it says that the council will "foster good relations between people in a diverse community". I do not believe they can possibly have complied with this when the then leader of the council resorted to childish personal insults in the early hours of the morning, to residents of the borough he was meant to be leading.

In November 2017 Councillor John Fulham (who was then a member of the council's executive) said that "Some of that green belt like at Florida Farm used to be pit head. Some of it used to be coal mines. It's not as if we are talking about the rolling hills of Shropshire here. But then there are other parts of St Helens that are also listed as green belt that are absolutely outstanding and deserve protection." He was dismissing the concerns of local residents about the loss of their greenbelt land because in his view it isn't as pristine as land in Shropshire. This comment shows that his thinking was being influenced by factors that were totally irrelevant to the decision. His comment can be found using the link below, you will note that St Helens Council failed to respond to resident's concerns about Cllr Fulham's views: <https://www.sthelensreporter.co.uk/news/protest-groups-seek-clarification-on-councillor-s-greenbelt-remarks-1-8863709>

Councillor Fulham was initially the council executive member with responsibility for the local plan, however he was sacked during infighting within the ruling group. He was replaced by Cllr Seve Gomez-Aspron who had clashed with opponents of the plan on social media and had in his own words given "vocal support to the Local Plan and other planning applications."

Councillor Gomez-Aspron said that "It is not fair on the council that the objections that this has attracted should overshadow the delivery of an ambitious Local Plan that this council deserves." I believe this shows that Cllr Gomez-Aspron's mind was made up and that he was more concerned about the interests of the ruling group of the council and what he felt they deserved than he was about local residents. Councillor Gomez-Aspron resigned a week later after being served with an official notice by police which set out an allegation of harassment against him (he denied any link between the notice and his resignation). I cannot believe that Cllr Gomez-Aspron was the right person for the role given his antagonistic relationship with opponents of the local plan and the fact that the council's standards committee had already ruled against him once. He was replaced by the man he had himself replaced a week earlier, Councillor John Fulham

(https://www.theboltonnews.co.uk/news/15289535.Cllr_Gomez_Aspron_resigns_from_growth_role_after_a_week/).

A further illustration of Cllr Gomez-Aspron's behaviour and his relationship with opponents is found in the fact that he was subsequently censured for comments made between November 2016 (before the consultation) and September 2017 "related to various campaign groups"

<https://www.wigantoday.net/news/politics/councillor-accused-of-sending-phallic-symbol-to-campaign-group-1-8911889> Again referring back to paragraph 3.5 of the SCI, given his behaviour the appointment of Cllr Gomez-Aspron could not but harm efforts to "foster good relations between people in a diverse community".

Councillor Derek Long, the new leader of the Council refused to defend the local plan in our meeting of 21/12/2018 saying that "As council leader, I became one of the unpaid council representatives on the long-standing partnership set up to regenerate the former Parkside Colliery site. For openness and transparency, I will follow my usual practice and make a declaration of interest and follow the convention of leaving the room for that item." If Councillor Long was too conflicted to vote on the decision to adopt the plan should he not have removed himself from the process of developing it? Either he had a conflict of interests or he did not, this cannot be a sort of Schrodinger's conflict of interests which applies when it suits him does but not when it does not

<https://www.sthelensreporter.co.uk/news/politics/st-helens-council-leader-slams-opposition-vote-against-local-plan-1-9504626>

It is my belief that this local plan is not legally compliant as the council have failed to comply with their own Statement of Community Involvement. My belief that they have failed in this duty is founded on my view that senior members of the ruling group made their minds up based on factors that are irrelevant to the process and that they never took the consultation process seriously. I believe I have demonstrated this through my comments above.

Soundness of the local plan

The council's own guidance says that the plan has to be "prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As I have set out above I believe that senior members of the council's ruling group, including two members who had been in charge of the plan and the then leader of the council have shown that they were being influenced by irrelevant factors. These factors include the desire to increase the council's income from council tax and business rates, a feeling that the council "deserved" the local plan and the fact that some of the land affected was not as pristine as "the rolling hills of Shropshire". This is what the senior councillors in charge of the process were willing to say in public. I cannot begin to imagine what they were saying in private.

I have also set out above some of my concerns relating to the attitude to consultation and the decision making process. Additionally when the question of whether the council should adopt this plan was finally brought to Councillors they called a special meeting for the 20th of December, less than a week before Christmas. Opposition councillors were only given two weeks to consider the plan before this meeting, members of the ruling group were briefed a week earlier. Most councillors are not professionals, many of us have jobs and commitments to our friends and families. Many of us had long standing plans in the run up to Christmas that we could not cancel.

The decision to hold an extra meeting at such short notice and give us so little time to prepare was totally unjustified and really quite outrageous. No apology was made for this and no explanation offered, we had a council meeting planned for January and no reason has ever been offered as to why this could not have waited until then. The decision to give Councillors from the ruling group a briefing a week before opposition members is, in my view, an appalling abuse of power. Especially given the timescales involved. If the plan was sound I do not believe the council would have made decisions which made opposition so difficult. They should have been willing to give opponents a fair chance to set out their views and then listened with an open mind.

The council has departed from the standard method to calculate housing need and there are no exceptional circumstances to justify this. The population projections used are overly optimistic about population growth in the borough. I fear that the land released from our greenbelt will be developed first as it is easier and cheaper than development on brownfield sites and that at the end of the process the population will not have increased by as much as expected. In this scenario we would have lost our green spaces and would be left with undeveloped brownfield sites. There is therefore, in my view, no "exceptional circumstances" justifying the release of greenbelt land.

The vision section of the local plan "high quality new employment development", but the only sector I could see specifically mentioned in a section on "Economy and skills" is logistics. The whole economic development side of the plan seems to be based on warehouses. The figures for how the land allocated for economic development will be used send a clear message; office space 10-15

hectares, research and development 1-4, light industry 15-20 hectares, storage and distribution is 110-155 hectares. Out of 190-239 hectares in total; more than half of that land is to be allocated to warehouses. Again I believe that the council's estimate of how many jobs "logistics" will create are an absurd over estimation. 03

Talk of "a diverse portfolio of accessible employment" is a fig leaf to hide an over reliance on one sector, a sector of poorly paid unskilled jobs and one that is increasingly automated. This is not long-term strategic thinking, it is a sign of how intellectually bankrupt this plan is and just how badly it would fail our Borough. St Helens has low paid jobs, we need a much greater diversity in employment that this plan would not deliver.

With respect to site 8HA in my own ward (and home) of Rainford. This site floods almost every winter and is obviously unsuitable for development. It slopes down towards a stream that runs through an area of the Borough called Blackbrook. Blackbrook regularly floods in heavy rain and both the Council and the Environment Agency have acknowledged the role that these fields play in slowing down the flow of water into the brook and therefore in reducing the peak flow of water in the stream. To build on these fields is an obvious folly that can only make this situation worse. 04
The land is also grade one agricultural land and intensively farmed. Road access to the site is, in my view, inadequate for the addition of several hundred new cars and the roads could not be expanded without either eating into the site or demolishing houses. Many residents fear the effect that this development would have on doctors surgeries and local schools.

The council say that they want to have some of the land released from the greenbelt without incorporating it into the current local plan. This is in case it might be needed for a future local plan. This is self evidently not an exceptional circumstance. 05

I apologise for the length of my comments, but I feel very strongly about this and I have tried to the point.

7. Please set out modification(s) you consider are necessary

To adopt more reasonable population projections which will reduce the requirement for greenbelt land.

To come up with a new economic development plan that is not so heavily focussed on warehousing and which would again reduce the amount of greenbelt land required.

To remove site 8HA from the local plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 8:08:19 PM
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RO1493

Ref: LPSD
28 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

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This form has two parts;

Part A - Personal Details **Part B - Your Representation(s)**

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>RICHARDS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>27 GARTON LANE</u>	Address: _____
<u>CLOCK FACE</u>	_____
<u>ST HELENS, MERSEYSIDE</u>	_____
Postcode: <u>WA9 4QX</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>27/02/2019</u>
-----------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) ☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map SHA		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>(1) NO INFRASTRUCTURE - IE LACK OF SCHOOLS - DOCTORS - SOCIAL LIFE - BUS SERVICES - DRAINS OVERLOAD.</p> <p>(2) SIDE ROADS LEADING ONTO GARTONS LANE, LIVERENT ROADS ONTO GARTONS LANE MANAGEMENT IS (7). TRAFFIC PROBLEM.</p> <p>(3) THE EFFECT ON THE LIVERENT WILD LIFE. IE INSECTS - SMALL MAMMALS, BIRDS ETC (HELPING TO KEEP THE PLANET GREEN).</p> <p>(4) SOCIAL HOUSING BRINGS IS SOCIAL PROBLEMS. WE HAVE GOT A DRUG PROBLEM IN THIS AREA.</p> <p>(5) THE CONTINUAL MESS/NOISE OF 10 YEARS BUILDING.</p> <p>(6) CHANGING GREEN BELT LAND TO BROWN BELT WHEN IT SUITS.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE MODIFICATIONS I FEEL ARE NECESSARY ARE TO
LEAVE THIS GREEN BELT LAND, AS GREEN BELT LAND,
AND TRY ~~PLANNING~~ TO LANDSCAPE IT, AND MAKE IT
A KIND OF COUNTRY PARK, WHICH WE COULD ALL
ENJOY, LEAVE THE CURRENT WILD LIFE TO HELP
THE ENVIRONMENT.

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	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I WOULD LIKE TO TAKE PART, BECAUSE I AM
A BORN & BRED CLOCKER AND TAKE WHAT
HAPPENS TO OUR VILLAGE VERY SERIOUS.
AND FEEL THE PROPOSED PLANS ARE NOT RIGHT
FOR THIS AREA

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1494

Representor Details

Web Reference Number	WF0306
Type of Submission	Web submission
Full Name	Mr Peter Richards
Organisation	West Lancashire Borough Council
Address	52 Derby Street Ormskirk L39 2DF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:**6. Please give details of why 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.**

West Lancashire Borough Council has no objections to the content of the St. Helens Borough Local Plan 2020-2035 Submission Draft document, and is content that the Plan has been prepared in compliance with all legal requirements and is "sound". In particular, West Lancashire Borough Council can confirm that St Helens Council have engaged on strategic, cross boundary matters in accordance with the requirements of the Duty to Co-operate both as part of the Liverpool City Region (including West Lancashire) working groups and evidence studies, and directly with West Lancashire Borough Council in relation to specific cross-boundary matters which affect St Helens and West Lancashire. ①

In particular, this Council supports the St Helens Local Plan's proposals to allocate a significant area of land for employment purposes (policy LPA04.1) on the M6 Corridor, including for large-scale Logistics space, which will, alongside proposals in West Lancashire's own Local Plan Review for the M58 Corridor, help to meet the wider demand for such large-scale Logistics space arising in the Liverpool City Region (including West Lancashire) as identified by the LCR SHELMA study. ③

This Council also welcomes the Local Plan's support for the Skelmersdale Rail Link proposals (policy LPA07 and on the Key Diagram), which, if delivery can be secured, will be of great benefit to West

②

Lancashire in general (in particular the town of Skelmersdale), as well as Rainford in St Helens borough and Kirkby in Knowsley borough.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 5:18:34 PM
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RO1495



St. Helens
Council

736

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGES TERR NEWTOWN,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

06/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land.

There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling. Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO1497



Representation re :- planning to build on green belt area in clockface /bold area

Karyn Richmond to: planningpolicy@sthelens.gov.uk

13/03/2019 15:21

From: Karyn Richmond [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

To whom it may concern,

I am writing to object in relation to the plans to build on green belt land in the clock face/ bold area.

I strongly object to these plans for the following reasons:

- There are limited school places in the area
- There are not enough facilities in the area
- The green belt in question is currently used as arable/ grazing land.
- [REDACTED] as did lots of the other local residents.

Also it is my opinion that building low cost affordable housing often results in landlords purchasing multiple properties which are rented out and are not always maintained to a high standard by the tenants.

A small development of high cost houses bringing wealth and affluence to the area would be of massive benefit (such as the new development called French Fields crescent off Gorsey lane). I strongly object with the plans to build 3000 homes in this area. I trust that my comments will be recorded for consideration.

Yours faithfully,

Karyn Richmond
Of 2 Longfield park
Clock face
St. Helens
WA9 4YH

Sent from my iphone (Kaz)

RO1498



St Helens
Council

398

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable) ALSO ON BEHALF OF
Title: <u>MRS</u>	Title: <u>MRS</u>
First Name: <u>ALISON</u>	First name: <u>JOAN</u>
Last Name: <u>RIDD</u>	Last Name: <u>DAGNALL</u>
Organisation/company:	Organisation/company:
Address: <u>100, BEECH GARDENS</u> <u>RAINFORD</u> <u>ST. HELENS</u>	Address: <u>14, OLD LANE,</u> <u>RAINFORD</u> <u>ST. HELENS</u>
Postcode: <u>WA11 8EB</u>	Postcode: <u>WA11 8JE</u>

[Redacted section]

Signature: [Redacted]	Date: <u>8/3/19</u>
-----------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02 LPA05	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
		4.6.8 - 4.6.15 Table 4.5 8HA							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>It is our understanding that Green Belt land should only be released for development under exceptional circumstances. With a falling population, these cannot be considered exceptional circumstances. The proposed site 8HA is prime agricultural land and in the current situation of climate change and political uncertainty it would be irresponsible to future generations to give up this land.</p> <p>Building on this land would significantly affect the character and heritage of this area.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove areas which are currently in the Green Belt from the plan. Find alternative sites from brown-field land.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1499



St Helens
Council



13 MAR 2019

Ref: LPSD

(For official use only)

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Representation (i.e. Comment) Form**

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

3115

①-LP006

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Dr.	Title:
First Name: JOHN	First name:
Last Name: BOLTON RIDYARD	Last Name:
Organisation/company: Resident	Organisation/company:
Address: 9, The Meadows, RAINHILL, PRESCOT.	Address:
Postcode: L35 0PQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 10.3.2019
------------	-----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	DON'T KNOW	No <input type="checkbox"/>	DON'T KNOW
Sound?	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>	
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see the attached sheet.

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.

To remove LPA06 3HS from the category of 'safeguarded' to be returned to the status of green belt.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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.**

Section 6

We, residents of The Meadows, Rainhill, L35 0PQ, have discussed together the local plan for the green belt around Rainhill. ✓

We are concerned about the land of the old Eccleston Golf Club (LPA06 3HS) being removed from its current green belt status to that of being 'safeguarded land' for possible future, but not immediate, housing development. This land has been bought by the Mulberry Group, who are house builders, obviously for the explicit purpose of building houses. Therefore this land is under an imperative from a wealthy, influential corporation to be developed. We fear St. Helens Council will be put under enormous pressure to allow building on this land at a later date. ✓

Therefore we ask that LPA06 3HS is restored to the green belt for the following reasons: ✓

The roads in Rainhill are already heavily congested, especially on Rainhill Road which leads to this site and on Warrington Road, A57. There would need to be a large investment in the local road network to accommodate an increase in traffic from building on LPA06 3HS. The Skew Bridge in Rainhill Village is Grade I listed and cannot be modified.] ①

It cannot be argued that the site is convenient for rail travel as Thatto Heath, Eccleston Park, Prescot and Rainhill are peripheral to the site and none have adequate car parking. Lea Green car park is already full of cars early in the day.] ①

Whiston Hospital has recently been rebuilt, but with fewer beds. As of now it is under great pressure.] ①

The site is the only open space between Rainhill, Thatto Heath, Portico and Eccleston Park and is definitely a local amenity for walking and wildlife, for both plants and animals. To build on this site would lead to the loss of a local amenity, loss of wildlife and to create a solid built up area between Rainhill, Thatto Heath, Portico and Eccleston Park.] ①

Rainhill borders on Halton and Knowsley. Already Halton have built more houses on the north side of Widnes. Knowsley are building on the border of Rainhill on Scotchbarn Lane. However very close to Rainhill is the Liverpool City Regional Plan to build a Garden Village on the Halsnead Park estate. This potentially will have an enormous consequence for the local roads and amenities but is outside the jurisdiction of St. Helens Council. Yet it is highly relevant to residents of Rainhill.] ①

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Whiston Hospital has recently been rebuilt, but with fewer beds. As of now it is under great pressure.

The site is the only open space between Rainhill, Thatto Heath, Portico and Eccleston Park and is used for walking and seeing wildlife, both plants and animals. To build on this site would lead to the loss of a local amenity, loss of wildlife and would create a solid built up area between Rainhill, Thatto Heath, Portico and Eccleston Park.

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1. NAME B. RUSHTON PRINT NAME B. RUSHTON

ADDRESS [REDACTED]

DATE 9/3/19

SIGNATURE ... [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME M. Rushton PRINT NAME MARGARET RUSHTON

ADDRESS [REDACTED]

DATE 9/3/19

SIGNATURE ... [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME AUDREY SHONE PRINT NAME AUDREY SHONE

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME MARK SHONE PRINT NAME MARK SHONE

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

1. NAME Kathrin Lysons PRINT NAME Kathrin Lysons

ADDRESS [REDACTED]

DATE 9.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Mike Lyson PRINT NAME Mike Lysons

ADDRESS [REDACTED]

DATE 9.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME CATHERINE EMLEY PRINT NAME CA

ADDRESS [REDACTED]

DATE 9th March 2019.

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME LINDA COLLINS PRINT NAME

ADDRESS [REDACTED]

DATE 9/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

1. NAME MRS. V. MARTIN PRINT NAME

ADDRESS

DATE 9.3.19.

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME MR. T. M. SPIRIT PRINT NAME

ADDRESS

DATE 9-3-19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME Katherine Ann PRINT NAME

ADDRESS

DATE 9/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME Gerard Malone PRINT NAME G. MALONE

ADDRESS

DATE 9/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

1. NAME Rachel Doherty PRINT NAME RACHEL DOHERTY

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Liam Doherty PRINT NAME LIAM DOHERTY

ADDRESS [REDACTED]

DATE 10.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME NOEL LEE PRINT NAME [REDACTED]

ADDRESS [REDACTED]

DATE 10.3.2019

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME Richard Ridyard PRINT NAME RICHARD RIDYARD

ADDRESS [REDACTED]

DATE 10/03/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

1. NAME CHRISTINE..... PRINT NAME MITCHER.....

ADDRESS [REDACTED]

DATE 9.3.19.....

SIGNATURE [REDACTED]...

I give explicit permission for my name to be used in this response.

2. NAME ALAN MITCHELL..... PRINT NAME

ADDRESS [REDACTED]

DATE 9.3.19......

SIGNATURE .. [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME BRENDA HOUGHES..... PRINT NAME

ADDRESS [REDACTED]

DATE 9.3.19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME MRS. ANN STOTT..... PRINT NAME ANN STOTT.....

ADDRESS [REDACTED]

DATE 10/3/19.....

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

i. Printed Name MR. GEOFFREY DRACO

Address

Signature

Date 10/3/2019

2. Printed name SYLVIA DRACO

Address

L350P@

Signature

Date 10/3/2019

3. Printed Name Mrs Jennifer Turner

10/3/19

Address

Signature

Date

10/3/19

4. Printed Name Christopher Turner

Address

Signature

Date

10/3/19

1. NAME Joyce Ridyard PRINT NAME JOYCE RIDYARD

ADDRESS



DATE 10/3/19

SIGNATURE



I give explicit permission for my name to be used in this response.

2. NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

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3. NAME PRINT NAME

ADDRESS

DATE

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME PRINT NAME

ADDRESS

DATE

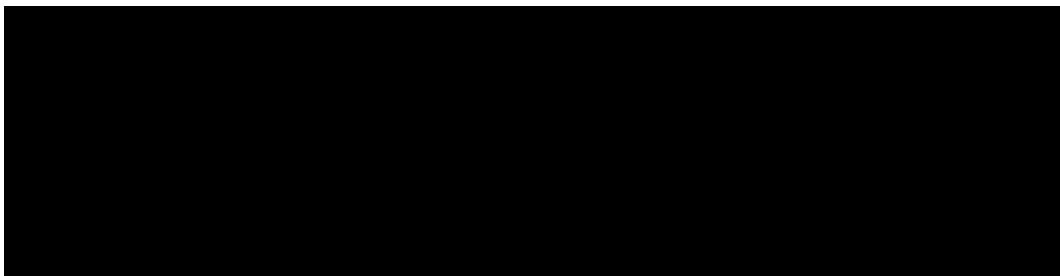
SIGNATURE

I give explicit permission for my name to be used in this response.

RO1500



Local plan 2018 HA16 now 8HS
Kathryn Rigby
to:
planningpolicy
13/03/2019 12:38



----- Forwarded message -----

From: **Kathryn Rigby** [REDACTED]

Dear Sir/ Madam

My name is Kathryn Rigby and I object in the strongest terms to the proposals that the recently published submission Draft of the local plan 2020 - 2035 referring to the land originally known as HA16 now 8HS has now been reclassified as safeguarded which means removing it from the greenbelt status it holds, putting it in danger of being developed on. I again stand by my original letter, stating why I again strongly appose this submission.

My husband and I chose to live in a semi rural area, so we could enjoy the benefits of the countryside be it through Green belt Land.

We chose to live here under the belief that this would remain semi rural with the knowledge that Green Belt Land should be protected by the fact that derelict and brownfield land is developed upon first i.e (urban areas which are within the Green Belt).

As we are aware Green belt land can only be taken in those of very special circumstances, according to (NPPF) and as far as we are aware housing needs are not under that umbrella. Green Belt land is there to prevent urban sprawl, to prevent settlements merging into one, to preserve the environment and all its natural resources. With the proposed development how far will the urban sprawl stretch in this New Local Plan?. Once the Green belt is taken it is irreversible we cannot retrieve it, it would be sacrificing rich fertile agriculture land. What about the derelict and the brown land within the area, is that to remain undeveloped.

TRAFFIC AND SAFFETY

This area already suffers with traffic congestion, especially at rush hours, it is extremely busy, already a known hazard, not forgetting that this area is abustle with children going and leaving school. Windle Island has just been renovated to make it safer, which will no doubt be impeded upon by the inevitable great increase in local traffic, causing a major health and safety issue. There appears to be no direct route from the development site, to the East Lanes, and seeing that most of all the big amenities such as the supermarkets are in or near St Helens town centre, can only mean the surrounding narrow roads will see a vast increase in the movement of traffic.

Windle has no train station, and the bus service is less frequent than that of other areas.

PUBLIC SERVICES

Windle has a lack of Public Services, there isn't a GP's, a Dentist, residents already have to go out of the ward. The school's are over subscribed a fine example would be that of Bleakhill being forced to become 3 form entry in 2016.

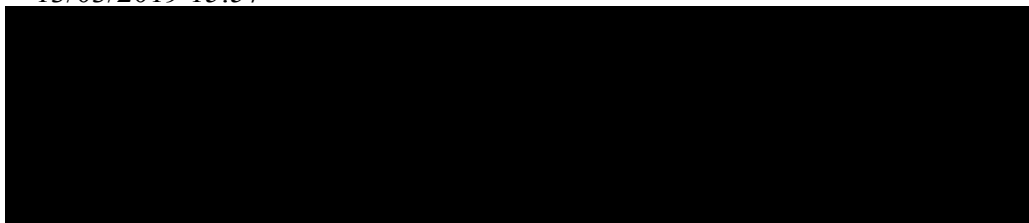
HEALTH

There will be an increase in air pollution, through congestion or waiting traffic, and of course with the increase of traffic, comes an increase of poor road surface.

Yours sincerely
Mrs Rigby
13 Lynton Way
Windle
St Helens
WA10 6EQ



Fwd: Local plan 2018 HA16 now 8HS
 Kathryn Rigby
 to:
 planningpolicy
 13/03/2019 15:57



----- Forwarded message -----

From: **Kathryn Rigby** [REDACTED]
 Date: Wed, 13 Mar 2019, 12:38
 Subject: Local plan 2018 HA16 now 8HS
 To: <planningpolicy@sthelens.gov.uk>

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