

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 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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: Chris Last Name: Ph.W.45	First name:
Last Name: Ph.W.45	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 3/5/19_

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

Plan 2020-2035? (namely submission inspector's recommendations and additional inspector).	of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption of the Plan)
Yes 📝 (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact y	preferred method of communication. If no e-mail output postal address.

RO1402



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

Ref: LPSD

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PART A - YOUR DETAILS

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

2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
1
Date: 11-3-19

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

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

RO1403

3HS - DLPAO6









1 3 MAR 2019 (For official use only)

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

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Please 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.

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

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St. Helens Council

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

PART B - YOUR REPRESENTATION

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

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainabilit Appraisal/ Strategic Environmen Assessmen	tal	Habitats Regulation Assessment
		s (please nan elevant part/s					
4. Do y	ou consid	er the St Hel	for expla	nations of Leg	Plan 2020-2035 is al Compliance an	d the Tes	sts of Soundness
	Complian	nt?	Yes			lo	Don't KNOW
Sound		The state of	Yes		Parisi Amerika	lo 🛛	
Coope	es with th rate ick as appro		Yes	U		lo 🗹	
Justifie Effective	ve?	National Police	(y? (y)				
or fails	to comply wish to su	with the dut	y to coo	perate. Pleas	se be as precise	as poss	npliant or is unsound sible. n, please also use th
box to	Removing belt in the it will crea Nutgrove life includ which sho Last year resulted in	e first place. In the a huge under the thing species would not be good and a number of the thing species.	reen be f this lar ban spra leath. T which ar iven ove to sever of inpatie	nd is removed awl across the his area of late e protected. It er to develope e flooding at ent beds need	I from green belt e areas of Whist and supports mar It is a hugely imp ment. Willowbrook Hos ding to be closed	and sulton, Eccloy birds, ortant a pice on and a r	ing this land as gree beequently develope eston Park, Rainhill, mammals and plant nd vital local resource Portico Lane which reduced capacity for oping the site at 3HS

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

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

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 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)-LPAOS 2-Statement of Common Grand 7 8

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2. Your Agent's Details (if applicable)

0 1 MAR 2019

PART A - YOUR DETAILS

(we will correspond via your agent)

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

4.00 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m	
Title: Mr	Title:
First Name: Cliftor	First name:
Last Name: Picton	Last Name:
	Organisation/company:
Brocsteder Road	Address:
Ashton in-Makeshed wigen	
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 24th FES 7019.
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	
Yes (via email)	DIN By post please
Please note - email is the Council's preferred methowe will contact you by your postal address	d of communication. If no email address is provided,
دا عد العراق عهد درو درو درو العراق ۱۹۰۰ ما ال	'S

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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FURTHER INFORMATION

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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.

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 p	art of the Local Pla	n does this repre	sentation relate?	
Policy LPAOS Site Plorida 2-AA Farm Sourn	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/section	on)		
	sider the St Helens the Guidance note		Plan 2020-2035 is: Legal Compliance and th	ne Tests of Soundness
Legally Comp	liant?		res No	
Sound?			res No	
Complies with	the Duty to Cooper	ate 🔲 `	res No	
Please tick as	appropriate			
	22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		because it is not: the Tests of Soundness	
Justified?	area!			
Effective?			2	
	n National Policy?			
			al Plan is not legally cor	
If you wish		l compliance or s	ease be as precise as po oundness of the Local P	The State College of the college of
decline Buildi Releasing of he	since 1981. g a green greenbelt le reenbelt.	best does and causes Housing in		t proof do has boon in to the purpose or sustainable site is modequile.

compliant or sound, having regard to the m relates to soundness (NB please note that a incapable of modification at examination). Y the Local Plan legally compliant or sound. I suggested revised wording of any policy or	
Dolete This land for from the greenbelt	n the proposed nomeral
	Please continue on a separate sheet if necessar ccinctly all the information, evidence and supporting
presentation at the publication stage. ter this stage, further submissions will be on d issues he/she identifies for examination.	nake further representations based on the original ally at the request of the Inspector, based on matters ation; do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.



(1) - LPAO6 PFOO75 (2) - Statement of Common Ground (1) St Helens Borough Local Plan 0 1 MAR 2019

2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: Clifford	
Last Name: Puton	
	Organisation/company:
Address: Brocskdes farm	Address:
, and a second s	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23 rd FEB 7019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, puradoption of the Plan)	
Yes (via email)	Mrs By Post please.
Please note - email is the Council's preferred method we will contact you by your postal address.	nod of communication. If no email address is provided,

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St. Helens Council

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Victoria Square

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

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Please continue on a separate sheet if necessary

the Local Plan legally compliant or sound. It suggested revised wording of any policy or Deleke Thus Ind from the	any non-compliance with the duty to cooperate is You will need to say why this modification will make t will be helpful if you are able to put forward your text. Please be as precise as possible.
greenbolt Prime importance is to u sites Greebelt land to be a	se deretict and Brow- artid
	Please continue on a separate sheet if necessary
A CONTRACTOR OF THE PROPERTY O	
will not normally be a subsequent opportunity to me presentation at the publication stage. After this stage, further submissions will be onlined issues he/she identifies for examination.	sentation and suggested modification, as there make further representations based on the original by at the request of the Inspector, based on matters attion; do you consider it necessary to participate at mgs in public)
will not normally be a subsequent opportunity to me presentation at the publication stage. After this stage, further submissions will be on and issues he/she identifies for examination. 8. If your representation is seeking a modifica	ly at the request of the Inspector, based on matters
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Title: Mr. E	Title:
First Name: Cliftyd	First name:
	Last Name:
	Organisation/company:
	Address:
Postcode: WN4 ONR	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23 rd FEB 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
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Yes (via email)	DA By Post please
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Policy Soon Paragrap diagram table Nesvel Since Lone	h/	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please a document and relevant par	name rt/section)				
4. Do you consider the St Please read the Guidance	Helens B	orough Loc	al Plan	2020-2035 is:	o Tooto of Coundary
Legally Compliant?			Yes		e lests of Soundness
Sound?		Ī	Yes	TO No	
Complies with the Duty to C	Cooperate		Yes	No	
Please tick as appropriate				•	
Effective? Consistent with National Pol	icy?				
6. Please give details of wor fails to comply with the lift you wish to support the use this box to set out you	ne duty to le legal co	cooperate. mpliance o	Please	be as precise as pos	ssible.
The council should	1 be p	not to s	stact	proof of its p	ocpulation-estimates
The population of					
u These exta T	reopte	coming	her	One of the	purposes of he
gree bell is to as	ssist u	MIL W	ban u	regeneration b	y encouraging he
telens) The release uppose as the great	elict ruis	eenbeit Housin	which will	there is an cause signification is a cool is a	abordance in St. at horm to me
ecause here one	nosch	cols De	xtors	de. Access to	no site on
because here are	idoqua	to Then	es no	nd with noish	ouring authorities
	*		1100	Please continue	e on a separate sheet if necessary

Delete this land from the removal of the greenbelt. There has been notices in supermarkets last week regarding short supply of produce. Whose does
Skitchers council think fresh produce comes from?
It there are no imports land of this quality will
need to be used to Grow Food, for on citiziens and this will happen in the near future.

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oralexamination

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1)-LPA04 PF0089 2)-Stalement of Common Grownol \



Council

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mc.	Title:
First Name: Clifford	First name:
Last Name: Picton	Last Name:
Organisation/company:	Organisation/company:
Brocstedes Road	Address:
Ashton-in-Makesheld wig	CM
Postcode: WN 4 ONK	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2319 FGB 7019
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	e accepted and that in order for your comments to be
Yould you like to be kept updated of future sta namely submission of the Plan for examination, proportion of the Plan)	iges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	DA By Post Please.
lease note - email is the Council's preferred met e will contact you by your postal address.	had of access to the

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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Policy Paragraph/	Policies	sentation relate?	11	
LPA 04 diagram table	Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
tered Livespool reads.				
Other documents (please name document and relevant part/section)				
4. Do you consider the St Helens B	orough Local P	lan 2020-2035 is:		
ricase read the Guidance note for	explanations of	Logal Compliance and th	e Tests of Soundness	
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Effective? Consistent with National Policy?				
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Please keep a copy for future reference.

RO1405



(2) - Statement of Common Ground

Ref: LPSD

0 1 MAR 2018

(For official use only)

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

we will contact you by your postal address.

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

0 1 MAR 2019

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
- 1 11 11 12 13 13 13 13 13 13 14 14 15 15 15 15 15 15 15 15 15 15 15 15 15	Title:
First Name: Sheila	First name:
Last Name: Pictor	Last Name:
	Organisation/company:
	Address:
MakerGeld, Wigan:	
Postcode: CONG TONR	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 747 FEB Z019
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
[2] [1] [1] [1] [2] [1] [2] [1] [2] [2] [2] [2] [2] [2] [2] [2] [2] [2	
Yes (via email)	DAO Ry Post please.
Please note - email is the Council's preferred method	of communication. If no email address is provided.

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

PART B - YOUR REPRESENTATION

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

. To whic	ch part of the L	ocal Plan c	loes this repres	sentation relate?	
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	uments (please t and relevant pa				
				Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
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				because it is not: the Tests of Soundness	
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Justified?			9		
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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

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(1)-LPA06 2- Statement of Common Ground &

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

Ref: LPSD

Representation (i.e. Comment) Form

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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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M(S	Title:
First Name: Part Sheila	First name:
Last Name: Pictor	
Organisation/company:	
Address: Brocstedes from Brocstedos Road Ashlenia-Manofield, Wigan	Address:
Postcode: WN4 ONR	Postcode:
and the state of t	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23 rd 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)

WHO By post

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

3. To w	hich par	t of the Local P	an does this rep	resentation	relate?	
Policy PAOL SILE LHS	North of Billinge Road	Paragraph/ diagram table	Policies Map	Ap Str En	stainability praisal/ ategic vironmental sessment	Habitats Regulations Assessment
		ts (please name relevant part/sect	ion)			
			ns Borough Loca e for explanations			e Tests of Soundness
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0-Statement of Common Ground

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

Ref: LPSD

For of 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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MrS	Title:
First Name: Sheila	First name:
Last Name: Pictor	Last Name:
Organisation/company:	Organisation/company:
	Address:
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Postcode: UNY ONK	Postcode:
	Tel No:
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Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
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Yes (via email)	135 Past Please
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

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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 greenbett All Brown held and derelich sites must be used before any greebell sites are ransidored as a lat resorr.

Creenbell land should be kept untouched and lits 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.



①-LPA04 PF0090
②-Statement of Common Ground.

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

Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

(For official use only)

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

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

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Shela	First name:
Last Name: Picton.	Last Name:
	Organisation/company:
Address: Brockedes Farm	Address:
Brocatodos Road	
Ashlon -n-Hakesbreid	
Postcode: WMY ONR	Postcode:
	Tel No:
	Mobile No:
	Email:
7.73 (10)	ACCURATION AND ADDRESS OF THE PARTY OF THE P
Signature:	Date: 2xh FEB Zoil
DI.	
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, puadoption of the Plan)	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	1 Mo ByPost Please
Please note - email is the Council's preferred meth	nod of communication. If no email address is provided,

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

3. To which part of the Local Pla	an does this repre	sentation relate?	
Policy Bether Paragraph/ LA04 Cond diagram table REA GEA LIVERTON TOTAL	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note	s Borough Local P	Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Compliant?		es No	
Sound?		es PNo	
Complies with the Duty to Coopera	ate Y	es PNo	
Please tick as appropriate			
Positively Prepared? Justified? Effective? Consistent with National Policy?			
6. Please give details of why you or fails to comply with the duty lf you wish to support the legal use this box to set out your co	compliance or so	ase be as precise as pos	ssible.
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his scale. The refe	aso of green	belt will care	se significant
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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.

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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.

RO1406



3-Statement of Common Ground St Halans Borough Loc

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

Ref: LPSD

0 1 MAR 2018

(For official use only)

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.

0 3 MAR 2019

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[1] [1] [1] [1] [1] [1] [1] [1] [1] [1]	Title:
First Name: Vencu	First name:
Last Name: Pickeu	Last Name:
	Organisation/company:
Brocstedes Road, Ashton-M-	Address:
Makerfield, Wigan.	Postcode:
, 33,334	Tel No:
	Mobile No:
	Email:
Signature:	Date: 24th 4EB 7019
lease be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
ould you like to be kept updated of future stages amely submission of the Plan for examination, publicoption of the Plan)	cation of the Inspector's recommendations and
Yes (via email)	Do by Post years.
lease note - email is the Council's preferred method	of communication. If no email address is provided

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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.

Policy PAOS Site Jorda ZHA Evini South	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)		
	nsider the St Helen I the Guidance note		Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Comp	liant?		Yes No	иниро
Sound?			Yes No	
Complies with	the Duty to Cooper	ate 🔲 `	Yes No	
Please tick as	appropriate	W 10	and the second s	
Positively Prep Justified? Effective? Consistent wit	h National Policy?			
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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.



(2) - Statement of Common Ground Ref: LPSD 1 MAR 2019 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

we will contact you by your postal address.

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Wendle	First name:
Last Name: Retain	Last Name:
	Organisation/company:
Address: Low Brooks Fa	m Burgala Address: Ashtan-u
Postcode: WWW & E	T-J Postcode:
The same of the sa	Tel No:
	Mobile No:
	Email:
Signature:	Date: 24 ^h 4EB 7019
Please be aware that anonymous form considered your MUST include your de	s cannot be accepted and that in order for your comments to be tails above.
	f future stages of the St Helens Borough Local Plan 2020-2035? amination, publication of the Inspector's recommendations and
Yes (via email)	By Post please.

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

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Local Plan

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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.

Appraisal/ Strategic Environmental Assessment Assessment Assessment Deter documents (please name document and relevant part/section) I. 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? Decomplies with the Duty to Cooperate I. 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 Please read the Guidance note for explanations of the Tests of Soundness Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Instiffied? Effective? Consistent with National Policy?	3. To which part of the Local Pla	n does this repre	sentation relate?	
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Legally Compliant? Sound? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? 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	Other documents (please name document and relevant part/section	on)		
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Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? 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	Legally Compliant?	Q	Yes No	10
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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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Miss	Title:
First Name: Cotted Wendy	First name:
Last Name: Picton	Last Name:
	Organisation/company:
Address: Brucstedes farm Brocstedes load, Ashton-	Address:
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	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23 ^{Fd} FEB 7019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Yes (via email)	1 By Post please.
Please note - email is the Council's preferred methor we will contact you by your postal address.	od of communication. If no email address is provided,

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

Policy Sonn Paragraph/	Policies	Sustainability	Habitats
PAGE 46 diagram	Мар	Appraisal/	Regulations
ite roof table		Strategic	Assessment
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smock		7 ISSOCIATION	
Other documents (please name document and relevant part/section)			
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Sound?		es No	
Complies with the Duty to Cooperate		es No	
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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.



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

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

Ref: LPSD

0 1 MAR 2019

(For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Vendy	First name:
Last Name: Pucton	Last Name:
	Organisation/company:
Brocstedes Road Arhton	BungdonAddress:
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Postcode: WNY ANK	Postcode:
	Tel No:
	Mobile No:
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Please be aware that anonymous forms can considered you MUST include your details a	not be accepted and that in order for your comments to be bove.
Would you like to be kept updated of future (namely submission of the Plan for examinat adoption of the Plan)	re stages of the St Helens Borough Local Plan 2020-2035? ion, publication of the Inspector's recommendations and
Yes (via email)	MNO Bylost Reall.
Please note - email is the Council's preferre	ed method of communication. If no email address is provided,

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

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

RO1407



2-Statement of Common Ground



Ref: LPSD

0 1 MAR 2018

(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)

01 MAR 2019

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Sima	First name:
Last Name: Retain -	Last Name:
Organisation/company:	Organisation/company:
Proc Shedes Road, Ashte	Address:
Postcode: UNY ONR	Postcode:
	Tel No:
	Mobile No:
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Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.
	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	By Post place.
Please note - email is the Council's preferred r we will contact you by your postal address.	method of communication. If no email address is provided,

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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.

PACS Site	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental	Habitats Regulations Assessment
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1 - LPAOS PF0079 3 - Statement of Common Ground

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Ref: LPSD

0 1 MAR 2019

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Part B - Your Representation(s)

PART A - YOUR DETAILS

we will contact you by your postal address.

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title:	Title:
First Name: Simon	First name:
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Would you like to be kept updated of future	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	Br. Postpleasi.
Please note - email is the Council's preferred	method of communication. If no email address is provided,

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

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.

	hich part of the Local Pla	does uns repre	oomation felate :	- curing and
Policy 1906 Site LHS	Paragraph/ diagram Billinge table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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	ou consider the St Helens se read the Guidance note			e Tests of Soundness
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Sound?			′es ☑No	
Compli	es with the Duty to Coopera	ate 🗆 Y	es 🖳 No	
Please	tick as appropriate			THE RESERVE OF THE PERSON OF T
Pleas	u consider the Local Plan e read the Guidance note ly Prepared?	for explanations of	the Tests of Soundness	
Effective			5	
Consist	ent with National Policy?			
or fai If you	se give details of why you ls to comply with the duty wish to support the lega his box to set out your co	y to cooperate. <u>Ple</u> I compliance or so	ease be as precise as po	ssible.
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relea	se of greenbest reenbest town	en Hus de	significant hos	le us of gous.
UY -)	7.7	ocho stal	ement t	LIACITY CO.

Please continue on a separate sheet if necessary

compliant or sound, having regard to the marelates to soundness (NB please note that a incapable of modification at examination). Ye the Local Plan legally compliant or sound. It suggested revised wording of any policy or	isider necessary to make the Local Plan legally atter you have identified at 6. above where this any non-compliance with the duty to cooperate is you will need to say why this modification will make t will be helpful if you are able to put forward your text. Please be as precise as possible.
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for agriculture and such	Please continue on a separate sheet if necessary
epresentation at the publication stage. After this stage, further submissions will be on and issues he/she identifies for examination.	ly at the request of the Inspector, based on matters
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

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

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



PF0088 3-Statement of Common Ground

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

Ref: LPSD

0 1 MAR 2019 (For official use only

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

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

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Sima	First name:
Last Name: Pictor	Last Name:
	Organisation/company:
Address: Brucshedu Fam Brucshedes Road, Ashtan-	Address:
Postcode: NN4 ONE	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23 4 FB 709.
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	
Yes (via email)	19 By Past please.
Please note - email is the Council's preferred metho	od of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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

or by hand delivery to:

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 Pla	n does this repre	sentation relate?	
Policy Sorth Paragraph/ diagram table THA West Amount table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	n)		
4. Do you consider the St Helens Please read the Guidance note f	Borough Local P	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Compliant?	_/	es □ No	o resto or boundiness
Sound?		es No	
Complies with the Duty to Coopera		es 19 No	
Please tick as appropriate			
Justified? Effective? Consistent with National Policy?	N D		
6. Please give details of why you or fails to comply with the duty If you wish to support the legal use this box to set out your con	to cooperate. Ple compliance or so nments.	ase be as precise as pos undness of the Local Pl	ssible. an, please also
The rouncil should be p The population of struct lese extra people rom	ens has decing from?	t proof of its population of Ne purposes	of he greenbat
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in all inada	wrote . The	neir no state	ment do .L'as
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deleke this land from the removal of the greenbelt.

This land should be kept as greenbelt and married as agricultural land that well be needed married as agricultural land that well be needed during an import crisis. Notices have been up in during an import crisis. Notices have been up in Sainsbury's this last weak regarding difficulty in Sainsbury's this last weak regarding difficulty in getting fresh produce most of which is imported.

getting fresh produce most of which is imported.

We need greenbelt land like this to lood the un 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.

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

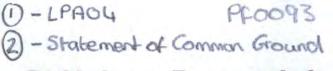
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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.





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;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

PART A - YOUR DETAILS

(we will correspond via your agent)

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

Title: Mr. Storce	Title:
First Name: Prota Sina	First name:
Last Name: Picton	Last Name:
Organisation/company:	Organisation/company:
Brocsledes Road	Address:
	Postcode:
, source of the same of the sa	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2xt FEB 2019
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	
Yes (via email)	WMO By Post please
Please note - email is the Council's preferred methowe will contact you by your postal address.	d of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

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Telephone: 01744 676190

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local P	an does this repres	sentation relate?	
Policy Remain Paragraph/ LAO4 diagram table SEA Liverent Remains the Remains	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/sect	ion)		
4. Do you consider the St Helen Please read the Guidance note	s Borough Local P	lan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Compliant?	U Y	es	
Sound?	Y	es No	
Complies with the Duty to Cooper	rate Y	es 🖳 No	
Please tick as appropriate			
5. If you consider the Local Plar Please read the Guidance note Positively Prepared?	for explanations of t	the Tests of Soundness	
Justified?			7
Effective?			
Consistent with National Policy?			
If you wish to support the lega	y to cooperate. Plea	ase be as precise as pos	ssible.
If you wish to support the legal use this box to set out your co	of cooperate. Please of some of should be some of should be some of the sould be sou	undness of the Local Pla	an, please also
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fter thi	s stage, fur ues he/she i	subsequent opportunity publication stage. ther submissions will be dentifies for examination station is seeking a module the examination? (the house of the examination?)	e only at the request. dification; do you	uest of the Inspecto	or, based on matters
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9. If yo	ou wish to p to be nece	articipate at the oral passary:	art of the examina	ation, please outline	e why you consider

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

Please keep a copy for future reference.

1800756M

RO1408





Ref: LPSD

1 2 MAR 2019

(For official use only)

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

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: DOROTHY	First name:
Last Name: PIRRCE	Last Name:
Organisation/company:	Organisation/company:
	Address:
ECCLESTON	
ST HELENS	
Postcode: WAIO SIX	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12-3-7019
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
Nould you like to be kept updated of future st namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-2039 publication of the Inspector's recommendations and
Yes (via email)	No
	ethod of communication. If no email address is provide

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	1	Paragraph/ diagram table	1	Policies Map	8Hs	Sustainability Appraisal/ Strategic Environmental Assessment	V	Habitats Regulations Assessment	V
		nts (please nam relevant part/s							
		sider the St He				2020-2035 is: al Compliance an	d the Te	sts of Soundne	ess
Legally	Compli	ant?			Yes	No			
Sound?					Yes	No			
Complie	es with t	the Duty to Coo	perate		Yes	No			
Please	tick as a	appropriate	-						
Justified Effective	e?	National Policy				AWED MET OT DELIVER	ABLE		
	3 3 3 7 3 3 3 3 3		7		e Local P	lan is not legally be as precise as	compli	ant or is unsou	
use t	his box	to set out you	ır com	ments.		Susta MABLE		A 51-11, 1/21-1/16	
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7. Please set out what modification(s) you consider necessar compliant or sound, having regard to the matter you have is relates to soundness (NB please note that any non-complia incapable of modification at examination). You will need to the Local Plan legally compliant or sound. It will be helpful suggested revised wording of any policy or text. Please be	dentified at 6. above where this ance with the duty to cooperate is say why this modification will make if you are able to put forward your
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· NEEDS TO MENTION BROWN FIELD + PDL NOT YET &	N BROWNFIELD REGISTER
THE TOWN HAS 3, 170 ha of CONTAININATED LA REDEVELOPED. THERE IS NO NEED TO SAFEGUAR EQUIVALENT TO 7% OF THIS LAND, SOME OF MADE AVAILABLE BY 2035-50 - COUNCILS	AD WHICH COULD ER AN AREA OF GREAVESET THESE SITES COULD RE
, PROPERCONSIDERATION NEEDS TO BE CINE AGRICULTURAL LAND AND EFFECTS ON W	n to loss on gradel to
TRAFFIC CONCESTION ALREADY OBSERVABLE DEVELOPMENTSITS>, PARTICULARLY 8HS	PLANTO MANAGE AROUND PROJETERA

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

COUNCIL NEEDS TO ADDRESS IMPACT ON HEALTHCARE & EDUCATION

will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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

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

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

Yes, I wish to participate examination

sh to participate necessary:	at the oral part of the	examination, please outline w	hy you consider

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

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

Please keep a copy for future reference.

RO1409



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

977

3 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANOREW	First name:
Last Name: PIERT	Last Name:
Organisation/company:	Organisation/company:
Address: 226 FLEEL CANE	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
Please be aware that anonymous forms cannot be comments to be considered you MUST include you Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Finspector's recommendations and adoption of Yes (Via Email)	e stages of the St Helens Borough Local Plan for examination, publication of the
Please note - e-mail is the Council's preferred address is provided, we will contact you by you	

RO1410



J-LPAOS

PF0362



Ref: LPSD

1 1 MAR 2019

(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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Guyan	
	Last Name:
	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: HTA MARCH, 2019
Please be aware that anonymous forms cann considered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.
Would you like to be kept updated of future (namely submission of the Plan for examination of the Plan)	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred	d method of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

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Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	iments (please name and relevant part/secti	ion)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Cor	mpliant?		Yes 🔀 No	
			Yes 🗵 No	
Sound?	vith the Duty to Coope	rate	Yes ⊠ No Yes No	
Sound? Complies v	vith the Duty to Coope as appropriate	rate		
Sound? Complies v Please tick 5. If you co	as appropriate	n is unsound, is it	Yes No	
Sound? Complies v Please tick 5. If you co	as appropriate onsider the Local Plane ead the Guidance note	n is unsound, is it	Yes No	
Sound? Complies v Please tick 5. If you co Please re Positively P	as appropriate onsider the Local Plane ead the Guidance note	n is <u>unsound,</u> is it for explanations o	Yes No	nt Flavio Metropoloci
Sound? Complies v Please tick 5. If you co	as appropriate onsider the Local Plane ead the Guidance note	n is <u>unsound,</u> is it for explanations o	Yes No because it is not: f the Tests of Soundness	ELVERABLE

If you wish to support 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 DAMA, THE HOUSING NEEDS ASSESSMENT DOES NOT USE STANDARD METHODOLOCK THE LATEST DESESSMENT PRODUCED BY ONS (2016) PREDICTS THAT 383 HOUSES PER YEAR WILL BE REQUIRED IN ST. HELENS. THE COUNCIL ARE USING A DOIL FORECAST OF 486. THE PLAN MAKES NO MENTION OF BROWNFIELD AND PREVIOUSLY DEVELOPED LAND MOT INCLUDED ON THE BROWNFIELD RECISTER. THE ST HELENS COUNCIL CONTAMINATED LAND STATEMENT (2015) INDICATES 3 170 HO OF THE LOVEST PRIDARY CONTAMINATED LAND EXISTS, IF THIS WERE REMEDIATED THERE WOULD BE NO NEED TO RELEASE TWO GREEN BEST SHES OF 56 6/10 AND 148/10 AS SAFEGUARDED FOR BUILDING. THE LOSS OF GRADE! AND GRADE & AGRICULTURAL LAND WILL HAVE A HEGATIVE IMPACT ON FARMING AND DISTRIBUTION JOBS. THE PLAN PROMOTES UNSUSTAINABLE TRAFFIC CIRONTIL THAT WILL NOT SAMSFY THE HPPPF (2016) AND WILL HAVE A SIGNIFICANT IMPACT ON AIR-QUALTY, MOISE, TRANSMILLY AND CENCRA HEALTH. THE IDP FAILS TO EXPURIN THE IMPACT ON HEALTHCARE AND EXICATION

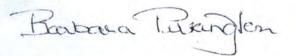
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1411







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

Ref: LPSD

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
// 0 -	Title:
First Name: BARBARA	First name:
Last Name: PINKINGTON	Last Name:
Organisation/company:	Organisation/company:
Address: U/S, / / / RPOOL KA	Address:
STHEFAIC	
Postcode: 4 JAII 9RY	Double of the second of the se
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1	Tel No:
Email:	Mobile No: Email:
Signature	Date: 5 3/19.
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	e accepted and that in order for your comments to be
ould you like to be kept updated of future sta	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	TV No
lease note - email is the Council's preferred med will contact you by your postal address.	thod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(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.

Borboice turing len

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 Loca	I Plan does this repre	esentation relate?	
Policy LPR OS SITE 2 HR Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please nar document and relevant part/s	ne ection)		
4. Do you consider the St He Please read the Guidance r	elens Borough Local I	Plan 2020-2035 is: Legal Compliance and the	e Tests of Soundness
Legally Compliant?			N'TKNOW.
Sound?		Yes Mo	W I KIVOW
Complies with the Duty to Coo	perate	Yes No	
Please tick as appropriate			1
5. If you consider the Local F Please read the Guidance n	Plan is <u>unsound</u> , is it ote for explanations of	because it is not: the Tests of Soundness	
Positively Prepared?	Ø		
Justified?	F		
Effective?	W.		
Consistent with National Policy	? 🗹		i a
6. Please give details of why or fails to comply with the lf you wish to support the luse this box to set out you	egal compliance or so r comments.	ease be as precise as pos oundness of the Local Plant	ssible. an, please also
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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.

the oral part of the examination? (the hearings in public)	If your representation is seeking a modification; do you consider it necessary to part the oral part of the examination? (the hearings in public)	icipate at
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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

Bostona Takingkn.

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 docur document a	ments (please name and relevant part/section	on)		
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

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RO1412





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

Ref: LPSD

0 7 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Warf	First name:
Last Name: Puragian	Last Name:
Organisation/company:	Organisation/company:
Address: 318 dues of Rai	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:
Signature:	Date: 543-19
Please be aware that anonymous forms c considered you MUST include your detail	annot be accepted and that in order for your comments to be s above.
Would you like to be kept updated of fu (namely submission of the Plan for exami- adoption of the Plan)	nation, publication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's prefe	rred method of communication. If no email address is provided,

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

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

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

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

PART B - YOUR REPRESENTATION

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

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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)

 \checkmark

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

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

Detek this land from the proposal from the Green Bell

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 partic	ipate at
the oral part of the examination? (the hearings in public)	

 \checkmark

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

RO1413

13, Park Roed North, Newton-6-Ullows. Keneyride 3 0 APR 2019 WAIZ 9TF. The offices in Charge, 838 Local Plan, St Helens MBC WAID IHP. Dear Sir Meden St. Helen Berangh Level Plan I work to object to the proposed remerch of the Particle East one from the green belt. This is length good quality, highly productive creble/and, At the population grows there is an in creasing need for Britain to produce its our food, portruled if we leave the European Union. It would the five

be folly to concrete over this land and put it to something other than agraillard use_ Tours faut fully Land HPU.

RO1414





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

(For official use only)

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PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)				
	Title:First name:				
Title: MAN					
First Name: 1Homas					
Last Name: PIMBLETT	Last Name:				
	Organisation/company:				
Address: 147 BLEAK HILL RY	Address:				
Postcode: WA 10 6 D W	Postcode:				
Tel No:	Tel No:				
Mahila No:	Mobile No:				
Email:	Email:				
Signature:	Date: 9/3/2019				
considered you MUST include your details about	be accepted and that in order for your comments to be ve.				
Would you like to be kept updated of future a (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and				
Yes (via email)	□ No				
Please note - email is the Council's preferred in	method of communication. If no email address is provided,				

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or by hand delivery to:

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	part of the Local Fit	an does this repre	sentation relate?	
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/sect	ion)		
4. Do you o	consider the St Heler ead the Guidance note	ns Borough Local e for explanations o	Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
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9. If you wish to participate at the this to be necessary:	oral part of the examination, please outline why you consider
Please note the Inspector will deter	sing the most engine sint in the last of the same since
ndicated that they wish to participate	nine the most appropriate procedure to adopt to hear those who have 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.

1800848M

RO1415



(1)-LPA06 (2)-Statement of Common Ground

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

Ref: LPSD

0 1 MAR 2013 (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: MC	
First Name: Herbert	First name:
Last Name: PimbleH	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2310 FEB 2019
Please be aware that anonymous forms cannot b considered you MUST include your details above	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? oublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me	ethod of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

NEXT STEPS

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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 Pla	n does this repre	sentation relate?	
Policy North Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note			ne Tests of Soundness
Legally Compliant?		res No	
Sound?		res No	
Complies with the Duty to Coopera	ate 🔲 `	res No	
Please tick as appropriate	, interest		ahii k
5. If you consider the Local Plan Please read the Guidance note			
Positively Prepared?			
Justified?			
Effective?		2	
Consistent with National Policy?			
6. Please give details of why you or fails to comply with the dut of you wish to support the legal use this box to set out your co	y to cooperate. <u>Pl</u> I compliance or s	ease be as precise as po	ossible.
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of he purposes of he	greenbelt	& to assist in	urban negeneatia
y encouraging the recy	ding of de	explicit and when	lond.
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releace of greenscit	elt - Housi	ng in Tris area	is not so sicules
the to lacked schools,	doctorsulte	· Thee is no s	ratement a
Common ground	berneu St-H	olen + neighbour	ing outhorhies

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

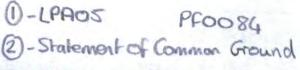
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

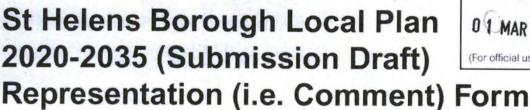
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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: Heber	First name:
Last Name: Pinblett	Last Name:
	Organisation/company:
Golbone, warrington	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 23rd FEB 2019
Please be aware that anonymous forms cannot be considered you MUST include your details above	be accepted and that in order for your comments to be
Would you like to be kept updated of future st	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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

PART B - YOUR REPRESENTATION

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

3. To which p	part of the Local Pla	n does this repre	sentation relate	?	×
Policy South LAOS BALLI THE West LHA Smooth	diagram table	Policies Map	Sustainabi Appraisal/ Strategic Environme Assessme	ntal	Habitats Regulations Assessment
Other docume document and	ents (please name d relevant part/section	on)			
4. Do you con Please read	nsider the St Helens I the Guidance note	Borough Local F	Plan 2020-2035 is Legal Compliand	s: ce and the Te	ests of Soundness
Legally Comp			es -	No	
Sound?				No	
Complies with	the Duty to Coopera			No	
Please tick as				. 10	
ffective? Consistent with	National Policy?				
If you wish to	details of why you omply with the duty o support the legal to set out your cor	compliance or so	ase be as precis	se as possib	le.

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 greenbest Due to import crisis it Fresh produce, as reported recently an BBC T.V. greenbest land must be maintained as greenbest, 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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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.

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

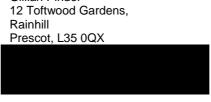
Hi,

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

Regards Gillian Pinder Clerk to Rainhill Parish Council

Rainhill Parish Council

Clerk to the Council: Gillian Pinder Rainhill





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

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





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

Rainhill Parish Council

Clerk to the Council: Gillian Pinder 12 Toftwood Gardens, Rainhill Prescot, L35 0QX



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 oversubscribed:
- 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

RO1417





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

Ref: LPSD

0 8 MAR 2019

(For official use only)

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
Last Name: PWG	Last Name:
	Organisation/company:
Organisation/company.	Organisation/company.
Address: 6 ELSTEAD GRAVE	Address:
GALSWOO	
WIGAN	
Postcode: WN4 ORT	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 23 Feb 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? olication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

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3. To w	hich pa	rt of the Loca	l Plan c	loes this r	epresent	ation relate?	
Policy	LPADS SITE IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		its (please nai relevant part/s			· I		
						2020-2035 is: al Compliance and	the Tests of Soundness
Legally	/ Complia	ant?			Yes	☐ No	
Sound	?				☐ Yes	₽ No	
Compl	ies with t	he Duty to Co	operate		☐ Yes	₽ No	
Please	tick as a	ppropriate					
Positive Justifie Effectiv	ely Prepa ed? ve?			o prantatio		Tests of Soundnes	
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	Please continue on a separate sheet if necessary
nformation necessary to support/justify the represivill not normally be a subsequent opportunity to representation at the publication stage.	section and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters
8. If your representation is seeking a modificathe oral part of the examination? (the heari	ation; do you consider it necessary to participate at ngs in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

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Policy LPA05: Site 1HA

Section 6 continued...

one of the purposes of the Greenbelt is to assist in orthan regeneration by ancavaging the recycling of derelict and other orthan land. Using Greenbelt fails to encourage this.

the release of Greenbell will come significant harm to the purposes of the Greenbelt

Having in this area is not sestainable because of the lack of school places decist surgeries, bus routes and other services. The use of cats is being encouraged because of the lack of facilities.

the access to the site an either Billings Road or Godswood Road would be inadequate Any necessary highways works must be funded by the developer and not the Cancil Tax payers.

there is no statement of common ground with neighbouring authorities





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

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
, , , , , , , , , , , , , , , , , , , ,	Title:
First Name: KEUNETH	First name:
Last Name: PING	Last Name:
Organisation/company: DIA	Organisation/company:
	Address:
<u>~</u>	
	Postcode:
	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 23 Feb 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	les of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
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Please note - email is the Council's preferred meth we will contact you by your postal address.	od of communication. If no email address is provided,

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3. To which part	of the Local Pla	n does this r	epresent	ation relate?	
SITE	Paragraph/ diagram table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents document and re	s (please name elevant part/section	on)			
4. Do you consider Please read the					he Tests of Soundness
Legally Compliar	nt?		Yes	☐ No	
Sound?			☐ Yes	✓ No	
Complies with the	e Duty to Coopera	ate	☐ Yes	No	
Please tick as ap	propriate				
Please read th Positively Prepara Justified?				ause it is not: Tests of Soundness	
Effective?	Jalia and Dalina O		<u>U</u>		
Consistent with N	national Policy?				
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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.					
t	pelete this land emasor from t	the Granbour			
		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.					
	our representation is seeking a modification oral part of the examination? (the heari	ation; do you consider it necessary to participate at ings in public)			
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination			
	ou wish to participate at the oral part of to be necessary:	f the examination, please outline why you consider			
Please	note the Inspector will determine the most	t appropriate procedure to adopt to hear those who have			
Thank y	d that they wish to participate at the oral p ou for taking the time to complete and i keep a copy for future reference.				

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

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

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.





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

Ref: LPSD

0 8 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
, , , , , , , , , , , , , , , , , , , ,	Title:
	First name:
	Last Name:
	Organisation/company:
Address: 6 EUSTEAD GRASE	Address:
15120.	
	Postcode:
Tel No:	Tel No:
	Mobile No:
Email:	_ Email:
Signature:	Date: 23 Feb 209
Please be aware that anonymous forms cannot be considered you MUST include your details above	pe accepted and that in order for your comments to be e.
Would you like to be kept updated of future so (namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred m we will contact you by your postal address.	ethod of communication. If no email address is provided,

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3. To which part of the Local Plan does this representation relate?							
Policy LPA of Paragraph/diagram table SEA	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?	Ye	s 🔲 No					
Sound?	☐ Ye	s Ho					
Complies with the Duty to Cooperate	Ye:	s INO					
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?							
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 Caunci (Should be put to strict proof of the need for this type of development, in this position and on this scale.							
More development reduces land associlable to grow food.							

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 the Greenbelt				
removal from t	the Greenbelt				
	Please continue on a separate sheet if necessary uccinctly all the information, evidence and supporting				
and issues he/she identifies for examination.	cation; do you consider it necessary to participate at rings in public) Yes, I wish to participate at the oral				
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Please note the Inspector will determine the most ndicated that they wish to participate at the oral participate at the oral participate.	st appropriate procedure to adopt to hear those who have part of the examination				
Thank you for taking the time to complete and					

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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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
	Organisation/company:
Organisation/company.	Organisation/company.
	Address:
-	
	Darte ada.
	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 23 Feb 2019
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pul adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred meth we will contact you by your postal address.	od of communication. If no email address is provided,

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Policy LASA 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 B Please read the Guidance note for			the Tests of Soundness
Legally Compliant?	1	Yes No	
Sound?		Yes No	
Complies with the Duty to Cooperate		Yes No	
Please tick as appropriate			
5. If you consider the Local Plan is Please read the Guidance note for			s
Positively Prepared?			
Justified?	V	•	
Effective?	V		
Consistent with National Policy?			
6. Please give details of why you or fails to comply with the duty of the legal of	to cooperate. <u>F</u> compliance or	Please be as precise as	possible.
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incapable of modification at examination). the Local Plan legally compliant or sound. suggested revised wording of any policy of	
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	Please continue on a separate sheet if necessary
formation necessary to support/justify the repre fill not normally be a subsequent opportunity to epresentation at the publication stage.	uccinctly all the information, evidence and supporting esentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters
8. If your representation is seeking a modific the oral part of the examination? (the hear	cation; do you consider it necessary to participate at rings in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	f the examination, please outline why you consider
lease note the Inspector will determine the mos	st appropriate procedure to adopt to hear those who have
idicated that they wish to participate at the oral phank you for taking the time to complete and	part of the examination

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Policy LPA06: Site 1HS

Section 6 continued...

fails to encorage this.

the release of Greenbell will couse significant harm to the purpose of the Greenbell.

Housing in this area is not sustain able 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

with neighbouring authorities

Ever decreasing amount of land available to help feed an ever increasing population.

RO1418





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0 8 MAR 2019

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

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3. To w	hich pai	t of the Loca	l Plan d	loes this re	present	ation relate?			
Policy	LPA06 site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
1		ts (please nar relevant part/s							
	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								ess
Legally	/ Complia	ant?			Yes	☐ No	Dont	know	
Sound	?				Yes	No			
Compl	ies with t	he Duty to Co	operate		☐ Yes	₩ No			
Please	tick as a	ppropriate		<u>-</u> :					
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Consis	tent with	National Polic	;y?		V		<u> </u>		
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ormannot in not	normentation is stated at the	necessar hally be a con at the he/she ic epresen part of t o, I do no the oral ish to pa	y to su subse public her su lentific tation he exa t wish examin	pport/jus quent op ation stag ibmissio es for exi is seekir amination to particip ation	tify the portunge. Ins will aminate of the poate	be only ion.	entational ake fur	you corublic) Yes, I we examina	ormatic gested esentati of the nsider i	it ne	vider difica base pect cess	or, ba	nd s that the constant seed	upporting nere original on matte rticipate

Please keep a copy for future reference.

(CONT)

- The infrastructure in the village already struggles to sustain adequate school places, doctors/ medical facilities. And big increase in population would lead to ever 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 subable for the local traffic we already generate, we need to keep our duidner safe from traffic-this is a rural area.
- There is inadequate access to the proposed site from Billinge hoad/Leyland Green Road or Garswood Boad.
 - There is no statement of conamon grand with neighbouring authorities.





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1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
	Title:
First Name: GILLIAN	First name:
Last Name: PING	Last Name:
Organisation/company: N/A	Organisation/company:
GARSWOOD	Address:
	Postcode:
	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 5 th March 2019
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Would you like to be kept updated of future st (namely submission of the Plan for examination, adoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
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-			
Policy LPA05 Clare Paragraph/ clagram table LPA	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please namedocument and relevant part/se			
4. Do you consider the St Hell Please read the Guidance no			e Tests of Soundness
Legally Compliant?	W.	Yes □ No 1	purt Know
Sound?		Yes ☑ No	
Complies with the Duty to Coop	perate	Yes ☑No	
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Effective?	Ū	,	
Consistent with National Policy	? 📝		
6 Please give details of why	vou consider the Loc	cal Plan is not legally cor	
or fails to comply with the lf you wish to support the l use this box to set out you	duty to cooperate. <u>Pl</u> egal compliance or s r comments.	oundness of the Local P	lan, please also
or fails to comply with the lift you wish to support the li	egal compliance or sor comments. I grands of ine some 1981. I sites should in the country the country the interior of the interior of the country that country the cou	reasing population of the population of be printeritised to robbing the Green to grow more of it age struggles to our roads we wring routes. The	lan, please also lestimates. These of Helens has houses, to house allowing his are infrequent hich are only lack of facilities

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 parcel of land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

· (CONT)

- There is inadequate access to the site from Smock lave/ Billinge food/Gravinood load. The tax-payer should not have to pay for any road improvements that will'd be needed, and it to the developer is expenditure.
 - There is no statement of common ground with neighboring authorities.

RO1419



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.

Rainford Specific points (8HA Rookery Lane)

economic growth yet this will have the opposite effect.

 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

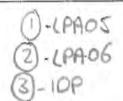
There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Regards Harry Platt

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

RO1420





(4)-Para 1-7-2 OTC

1 3 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.

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Part B - Your Representation(s).

PART A - YOUR DETAILS

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

Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address: Postcode:
Tel No:
Mobile No:
Email:
Date: 12/03/19

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

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

RETURN DETAILS

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post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St.Helens Merseyside WA10 1HP

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01744 676190

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Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	entation relate? Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
		s (please nar elevant part/s				
4. Do y	ou considered the Constant	der the St He	ens Boi	ough Local P	lan 2020-2035 is: al Compliance and the	Tests of Soundness
Legally	Complia	nt?	Yes		No L≯	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Sound?			Yes		No 🗆	
Complies with the Duty to Yes Cooperate				No 🗆		
Please I	read the Co	Buidance note	for expla	nations of the	ecause it is not: Tests of Soundness is based on flawed m	ethodology
Effectiv				X No the plan	is not deliverable	
A		National Poli	The second secon	X No- it does	not comply with NPPF	2018
or fails	to compl vish to <u>su</u>	y with the dut	y to coo al comp	perate. Pleas liance or sou	al Plan is <u>not legally c</u> se be as precise as po ndness of the Local Pl	ssible. an, please also use th
I believ	e that this Sustainab sustainab ective lan	version does not be transport as ble housing, tard use by conce	not satisf the plan gets pro- ntrating highe	promotes incre posed are base on Green Spac r densities. • fo	ement for Sustainable de eased car dependency rend on aspirational employ the development over toward od security by ignoring	mote from transport nubs ment growth predictions

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Please continue on a separate sheet if necessary

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	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					

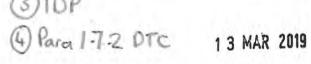
9 If you this to be	wish to particip (necessary:	oate at the or	al part of th	e examination	on, please	outline wh	y you co	nsider
- 1								

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.

RO1421





Ref: LPSD

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	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 Postcode:WA10 6HJ	Address: Postcode:
OSICODE. VATO OTO	Tel No:
	Mobile No:
	Email:

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

	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the option of the Plan)
Yes x☐ (Via Email)	No 🗌
Please note - e-mail is the Council's paddress is provided, we will contact vi	oreferred method of communication. If no e-mail ou 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

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01744 676190

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

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Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment		
		s (please nar elevant part/s						
Please I	read the G	uidance note	for expla		Plan 2020-2035 is: al Compliance and the 7			
	Complia	nt?	Yes		No □X			
Sound?			Yes		No □X			
Complies with the Duty to Youngerate			Yes	Ц	No □X			
Please ti	ck as appro	opriate						
Please i	ead the G	uidance note			ecause it is not: Tests of Soundness			
	ly Prepa	red?						
Justified				☐X No the plan is based on flawed methodology				
Effectiv				□X No the plan is not deliverable				
Consistent with National Policy? LIX			JX No- it does not comply with NPPF 2018					
					al Plan is <u>not legally co</u> e be as precise as pos			

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

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

higher densities. • food security by ignoring Agricultural Land Quality.

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.

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Please continue on a separate sheet if necessary

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

9.	f you wish to pa	rticipate at the ora	part of the	examination, I	please outlin	e why you	consider
	to be necessar		and the second				
-							

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Please keep a copy for future reference.

RO1422

765



1 3 MAR 2019

Ref: LPSD

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

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This form has two parts:

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: Mr	Title:
First Name:	First name:
Alexander	
Last Name:	Last Name:
Platt	
Organisation/company:	Organisation/company:
Address:	Address:
32 Rutherford Road	
Windle	
St Helens	Postcode:
Merseyside	
Da - 4 - a d a / A / A 4 O C 1	
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 Plan 2020-2035? (namely submission Inspector's recommendations and ad	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the option of the Plan)
Yes x☐ (Via Email)	No 🗌
Please note - e-mail is the Council's paddress is provided, we will contact v	preferred method of communication. If no e-mail you by your postal address.

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		you complete				····	
3. To w	hich part	of the Local	Plan do	es this repre	sentation relat	e?	
Policy	LPSD	Paragraph / diagram / table	8HS and 3HS	Policies Map	Sustaina Appraisa Strategic Environn Assessm	bility l/ nental	Habitats Regulation Assessment
Other d	ocument	s (please nar	ne				
docume	ent and re	elevant part/s	ection)				
4. Do yo	ou consid	ler the St He	ens Bor	ough Local I	Plan 2020-203	85 is:	
Please r	ead the G	iuidance note			gal Compliance	and the To	ests of Soundness
	Complia	nt?	Yes			No □X	
Sound?			Yes			No □X	
		e Duty to	Yes		No □X		
Cooper							
Please tid	ck as appro	opriate					
E IE VOI	. oonoida	rthe Legal D	lan ie ur	secund is it	because it is r	iat	
					Tests of Soun		
	ly Prepa			induone or the			
Justified				X No the pla	n is based on	flawed me	ethodology
Effectiv					n is not delive		<u> </u>
		National Poli		X No- it does not comply with NPPF 2018			
00110101	OTTE VITET	Tational : On	-				
or fails	to compl	y with the du	y to coc	perate. Plea	se be as prec	ise as pos	
box to s	set out vo	our comments	3				in, please also use this
	Sustainabl sustainab	le transport as ble housing, tar	the plan gets pro	promotes incr posed are base	eased car depered on aspiration	ndency rem al employr	elopment • the criteria for note from transport hubs. • ment growth predictions. • n centre development with

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After this stage, fu	rther submissions will be	only at the reques	t of the Inspector,	based
on matters and iss	sues he/she identifies for e	examination.		

8. If your representation is seeking a modification; do you consider it necessary to participate at

o participate at the on ssary:	ral part of the	examina	tion, plea	se outli	ine why	you conside
		77.70 2000 State 2772 State 2000				

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

RO1423





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

Ref: LPSD

2 4 APR 2019

(For official use only)

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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mes	Title:
First Name: SANDRA	First name:
Last Name: PUATT	Last Name:
Organisation/company:	Organisation/company:
Address: 571 GARSWOOD RD	Address:
Postcode: WN4 OXH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 6-4-19
Plan 2020-2035? (namely submission of the	re stages of the St Helens Borough Local Plan for examination, publication of the
Inspector's recommendations and adoption	or the Plan)

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St. Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy PA05	Paragraph / diagram / table	Policies Map	1HA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ments (please name and relevant 1)				
	consider the St Helens the Guidance note for				Tests of Soundness
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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

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

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

there were 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.

PAOS.





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 the 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	f the Local Pla	an does this represe	ntation relate?	eren verrienikent i
10	aragraph diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents document and relepart/section)				
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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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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 saw 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	
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO1424

1 2 MAR 2019

Ref: LPSD



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

(For official use only)

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

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

This form has two parts;

Yes (via email)

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: KENA	First name:
Last Name: PoDESTA	Last Name:
Organisation/company:	Organisation/company:
Address: 13 MANOR CLOSE GARSWOOD	Address:
ASHTON -IN-MAKERFIELD	
Postcode: WN4 0315	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10 · 3 · 19
lease be aware that anonymous forms cannot booksidered you MUST include your details above	be accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-203 publication of the Inspector's recommendations and

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

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Telephone: 01744 676190

NEXT STEPS

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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.

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

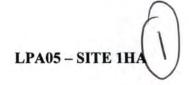
Policy Paragraph/	Policies	Sustainability	Habitats
LPAO5 diagram table	Map	Appraisal/ Strategic Environmental	Regulations Assessment
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Other documents (please name document and relevant part/section	ion)	-	
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



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

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundne Legally Compliant? Yes No Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? 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				
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doc this box to set out your comments.	Consistent with National Policy?			
	6. Please give details of why your fails to comply with the dur	ty to cooperate. <u>P</u> al compliance or s omments.	lease be as precise as	s possible.

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

LPA05 - SITE 1HS

Greenbelt land should only be released in exceptional circumstances.
 There are no exceptional circumstances in St Helens, which is a borough with a falling population.
 The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.

 Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
 The Local Plan will undo all the good work to date.

- The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
- Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
- There would be a detrimental effect to local wildlife.
 Protected species are known to be nesting in the proposed site.
- 6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
 These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
 Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
- 7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
- 8. Surely development of these sites would be prohibitively expensive given:

a. Water mains run through site 1HS

b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)

c. There is a bell pit under site 1HS

d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

RO1425



1 2 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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: John	First name:
Last Name: PODES TA	Last Name:
Organisation/company:	Organisation/company:
Address: 13 MAJOR CLOSE GARSIJOOD	Address:
HJHTONIN-MAKERI-IELD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10 - 3 - 19,
ease be aware that anonymous forms cannot be acconsidered you MUST include your details above.	cepted and that in order for your comments to be
	of the St Helens Borough Local Plan 2020-2035? cation of the Inspector's recommendations and
Yes (via email)	☑ No
ease note - email is the Council's preferred method will contact you by your postal address. riew at http://www.legislation.gov.uk/ukpga/2004/5/co	of communication. If no email address is provided,

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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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.

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3. To which part of the Local Pla	an does this repre	sentation relate?	
Paragraph/diagram table IHA.	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
Do you consider the St Helens Please read the Guidance note	s Borough Local F for explanations of	Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
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Complies with the Duty to Coopera	ate 🔲 Y	es No	
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Consistent with National Policy?			
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See separate	sheet c	ittached.	

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

Policy Paragraph/	Danser		
Policy Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
Legally Compliant?	\square	Yes \ \ \ \ \ No	
Sound?		Yes No	
Complies with the Duty to Coopera	ate 🔲	Yes No	
Please tick as appropriate			
5. If you consider the Local Plan Please read the Guidance note	is <u>unsound</u> , is it for explanations of	because it is not: the Tests of Soundness	
Positively Prepared?			
Justified?			
Effective?			
Consistent with National Policy?			
i. Please give details of why you or fails to comply with the duty If you wish to support the legal use this box to set out your co	to cooperate. <u>Ple</u> compliance or se	ease be as precise as po	ssible.
See separate	sheet a	ltached	

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)

 $\sqrt{}$

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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RO1426

1 2 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

we will contact you by your postal address.

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

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
	First name:
Last Name: PODESTA	Last Name:
Organisation/company:	Organisation/company:
Address: 100 BILLINGE ROAD ASHTONIN MAIRERFIELD	Address:
Postcode: (20) 4 Coco	Postcode:
	Tel No:
	Mobile No:
Email	imail:
Signature:	Date: 10/3/19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? elication of the Inspector's recommendations and
Yes (via email)	□ No
	od of communication. If no email address is provided,

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3. To which part of the Local Plan	does this r	epresent	ation relate?	
Policy PAOS Paragraph/diagram table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				
Do you consider the St Helens B Please read the Guidance note for				e Tests of Soundness
Legally Compliant?		✓ Yes	☐ No	
Sound?		Yes	□√No	
Complies with the Duty to Cooperate	•	☐ Yes	No	
Please tick as appropriate			ere en	
5. If you consider the Local Plan is Please read the Guidance note for				
Positively Prepared?				
Justified?		$ \sqrt{} $		
Effective?		\Box /		
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6. Please give details of why you co or fails to comply with the duty to				
If you wish to support the legal c use this box to set out your com		or soun	dness of the Local P	lan, please also
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	Please continue on a separate sheet if necessary
representation at the publication stage. After this stage, further submissions will be or and issues he/she identifies for examination.	make further representations based on the original nly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ings in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	f the examination, please outline why you consider

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3. To which part of the Loc	cal Plan does this	representatio	n relate?	
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Other documents (please h document and relevant par				
4. Do you consider the St Please read the Guidanc	Helens Borough L e note for explanati	ocal Plan 202 ions of Legal 0	0-2035 is: Compliance and	the Tests of Soundness
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Sound?		Yes	No.	
Complies with the Duty to C	Cooperate	Yes	No No	
Please tick as appropriate				
Positively Prepared? Justified? Effective? Consistent with National Po	الأحد الأ			
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removed from th	L Green Belt
	Please continue on a separate sheet if necessary
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the oral part of the examination? (the hear	ings in public)
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider
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LPA05 - SITE 1HS

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RO1427



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) 01 MAR 2019

PART A - YOUR DETAILS

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

	2. Your Agent's Details (if applicable)
Fitle: MISS	Title:
	First name:
ast Name: <i>Pol1/11</i>	Last Name:
	Organisation/company:
Address: 57 Birch Grove	Address:
	/
Postcode: WN4 OQX	Postcode:
	Tel No:
	Mobile No:
	Email:
	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)

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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3. To which	part of the Local Pl	an does this repre	sentation relate?	
Policy SIF LA H O A	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/sect	ion)		
	consider the St Helen and the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Cor	mpliant?		Ýes 🔲 No	
Sound?			Yes No	
Complies w	vith the Duty to Coope	rate	Yes No	
Please tick	as appropriate			
Effective? Consistent	with National Policy?			
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					Please continue or	n a separate sheet if necessar
nformation nece	ssary to su be a subse	pport/justify quent oppor	the represent	ation and	e information, evider suggested modifica epresentations base	tion, as there
	further su	bmissions	will be only a	t the requ	uest of the Inspect	or, based on matters

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)							
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination						

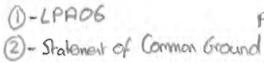
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: miss	Title:
First Name: Kalen	First name:
Last Name: Pollitt	Last Name:
Organisation/company:	Organisation/company:
Address: 57 Birch Grove	Address:
Postcode: WN 4 OQX	Postcode:
ostcode. 1474 y Oct/c	Postcode: Tel No:
	Mobile No:
	Email:
Signature:	Date: 27/2/19
ease be aware that anonymous forms canno onsidered you MUST include your details abo	t be accepted and that in order for your comments to be ove.
ould you like to be kept updated of future amely submission of the Plan for examination of the Plan)	stages of the St Helens Borough Local Plan 2020-2035 n, publication of the Inspector's recommendations and
Yes (via email)	□ No
ease note - email is the Council's preferred will contact you by your postal address.	method of communication. If no email address is provided

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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.

Policy LP P 06	SIFE	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/section	on)		
4 Do y	ou cons	ider the St Helen	Parough Local F	Now 2020 2025 in	
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7	Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this
	relates to soundness (NB please note that any non-compliance with the duty to cooperate is
	incapable of modification at examination). You will need to say why this modification will make
	the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your
	suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal

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.

RO1428



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

13 MAY 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: MICHAEL	First name:
Last Name: POOLE	Last Name:
Organisation/company:	Organisation/company:
Address: 1, HAYFIELD WA CLOCKFACE ST. HE	Address:
Postcode: WA9464	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
Would you like to be kept updated	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the
Yes (Via Email)	No 🗆
	And a part of the state of the
address is provided, we will contact you	preferred method of communication. If no e-mail ou by your postal address.

RO1429



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

1 2 MAY 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANN	First name:
Last Name: POOLE	Last Name:
Organisation/company: ONER SOS GROW	Organisation/company:
Address: 1, HAYFIELD WAY	Address:
Postcode: WAG 4 GU. HELENS	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date:
lease be aware that anonymous forms cannot be commented to be considered you MUST include you would you like to be kept updated of future Plan 2020-2035? (namely submission of the Post o	e stages of the St Helens Borough Local Plan for examination, publication of the
Inspector's recommendations and adoption of	
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's preferred address is provided, we will contact you by you	

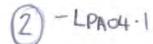
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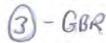


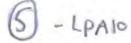
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation Peter Black

planningpolicy

13/03/2019 11:46







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

1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the <u>Submission Draft</u> 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 <u>world</u> 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

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· Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the <u>Employment Land Needs Assessment – Addendum Report January 2019</u> (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

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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.
Page 3 of 11

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.

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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	(2)	29	65	-2.7 -9.3	227.4	0
2020-35 using ELNA and higher demand	87	1-2	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

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2020-35 ELNA methodology, no 5y buffer or	73.5	0	0	+4.9 -9.3	69.1	-158.3
major sites						

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. Page **5** of **11**

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

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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.

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- 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.

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?

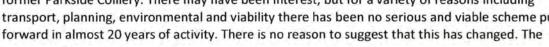
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Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) 'with the primary purpose of facilitating the movement of freight by rail and its on-site storage 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 railbased 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



'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.

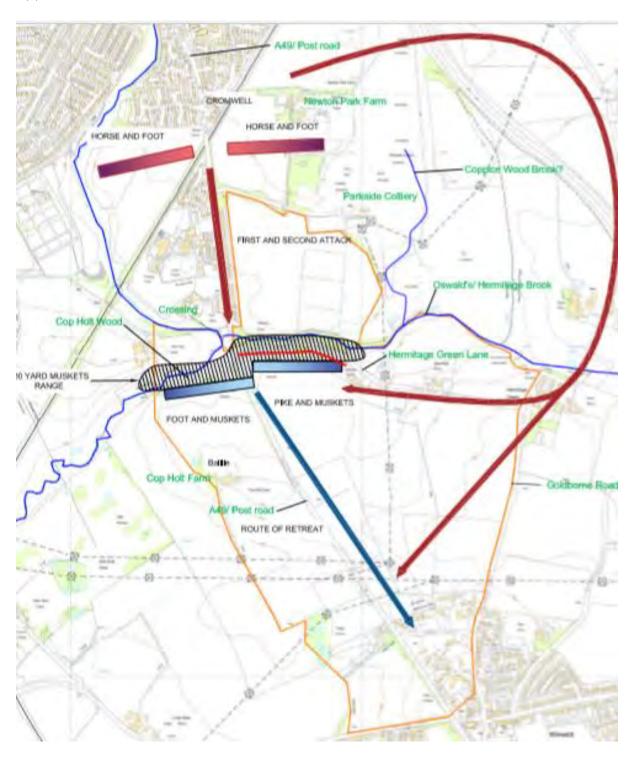
Para 17 suggests that local authorities should 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'. Parkside East and West would be difficult to access except 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

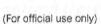


RO1431

1 2 MAR 2019

PP0458

Ref: LPSD





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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
	First name:
	Last Name:
Organ'sation/company:	Organisation/company:
GOLKTRNE	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 2/3/19
considered you MUST include your details above	
Would you like to be kept updated of future st (namely submission of the Plan for examination, adoption of the Plan)	tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me we will contact you by your postal address.	ethod of communication. If no email address is provided,

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PART B - YOUR REPRESENTATION

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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

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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
 - 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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RO1432

1 2 MAR 2019

Ref: LPSD



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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR and	Title:
First Name: BENJAHIN	First name:
Last Name: PORTER	Last Name:
Organisation/company:	Organisation/company:
Address: 1 THORNHILL ROAD GARSWOOP	Address:
	Postcode:
	Tel No:
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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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- 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?

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Other documents (please name document and relevant part/section	on)		
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Delete this land from the proposed removal from the Green Belt.

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 - c. There is a bell pit under site 1HS
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(2)- Statement of Common Ground
(4)- Statement of Common Ground
13 MAR 2019



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Title. MR	Title:
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Please he aware that anenymous 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 Flan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Ves (via email)

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

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indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

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

Policy	LPA	Paragraph/		Policies	Sustainability	Habitats
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7. Please set ou: 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 street it recessary 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) Yes. I wish to participate at the oral No. I do not wish to participate examination 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.



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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
First Name: TO - ANNE	First name:
	Last Name:
Organisation/company:	Organisation/company:
Address: 508 GARSWOOD RD	Address:
ASHTON IN MAKERFIELD.	
WIGAN	
Postcode: $\omega \kappa \varphi = \varphi \times \kappa$	Postcode:
	el No:
	Mobile No:
	Email:
Signature:	Date: 11/3/19
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pu adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	No
	od of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

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 road the Guidance Note that accompanies this form before you complete it.

3. To w	hich pa	rt of the Local Pl	an does this repres	y a compression of the second	en e
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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

3. To w	hich pa	rt of the Local Pla	in does this repre	sentation relate?		
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indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

Representor Details

Web Reference Number	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?

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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:
- 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

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Response Date	3/12/2019 9:46:30 PM

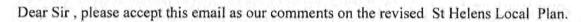
EL0140



Revised Local Plan representations starcottage to: planningpolicy 12/03/2019 22:41 1 - LPAOS

(D- PARA 1.7-





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

WA118QN



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.

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 st 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

O-LPAOS @-GEN @ Para 1.72 DTC

Representor Details

mepresenter betans	
Web Reference Number	WF0273
Type of Submission	Web submission
Full Name	Mr Stephen Pownall
Organisation	
Address	14 Viliers Crescent Eccleston St Helens Wa10 5HN
Agent Details	Harting to be the second of th

Would you like to be kept updated of future stages of the St Helens Borough 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 —

(3)

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 acheived 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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O-LPAOS (2)- Green Bell- Review (3)- GEN

Representor Details

mepresentor betans	
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	The state of the s
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.

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.

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 9:37:32 AM

(3)



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

Ref: LPSD

1 3 MAR 2019 (For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

Yes (Via Email)

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)				
Title: MR	Title:				
First Name:	First name:				
Last Name: POYMTON	Last Name:				
Organisation/company: ~~/~	Organisation/company:				
Address: 19 LAKESIDE GARDERS RAINFORD ST. HELENS WERSEYSIDE Postcode: WAII & HH	Address: Postcode:				
	Tel No:				
	Mobile No:				
	Email:				
Signature:	Date: Q FEBRUARY 2019				
would you like to be kept updated o	cannot be accepted and that in order for your include your details above. of future stages of the St Helens Borough Local of the Plan for examination, publication of the				

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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01744 676190

NEXT STEPS

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Last Name:
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Tel No:
Mobile No:
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Date: 9° FREUND 2019 of be accepted and that in order for your

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No 🗌

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Please continue on a separate sheet if necessary

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title:
• • • • • • • • • • • • • • • • • • •	First name:
Last Name: PRENDERCAST	Last Name:
Organisation/company:	Organisation/company:
Address: 29 THORNHILL ROAD	Address:
	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email	Email:
Signature:	Date: 3 842 Teb 2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
Would you like to be kept updated of future state (namely submission of the Plan for examination, padoption of the Plan)	ages of the St Helens Borough Local Plan 2020-2035? bublication of the Inspector's recommendations and
Yes (via email)	No
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3. To w	hich pa	rt of the Loca	l Plan c	loes this r	epresent	ation relate?	
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No, I do not wish to participate at the oral examination If you wish to participate at the oral part of the second secon	Yes, I wish to participate at the oral examination

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

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	Tel No:
	Mobile No:
	Email:
Signature:	Date: 28/2/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be

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

Yes (via email)

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

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

3. To w	hich pai	t of the Local Pi	an does this rep	resentation	relate?	
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		its (please name relevant part/sect	ion)			
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Sound	?			Yes	J-NO	
Compl	ies with t	he Duty to Coope	erate	Yes	No	
Please	tick as a	ppropriate			AL-9-13-13	
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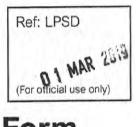
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Please keep a copy for future reference.

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



2 - Statement of Common Ground St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	Title:
First Name: MARIAN	First name:
Last Name: PRESCOTT	Last Name:
Organisation/company: RACCED	Organisation/company:
HAYDOCK	Address:
Postcode:WAII 91RX	Postcode:
	Møbile No:
	Email:
Signature:	Date: 25/2/19
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred method we will contact you by your postal address.	nod of communication. If no email address is provided,

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant?	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? Dang KNDW Yes No Sound? Yes No Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	Palicy PAOS SITE ZHA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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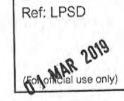
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D-LPAOL 2-Statement of Commun Ground





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First Name: MARIAN)	First name:
Last Name On GOTT	Last Name:
Last Name. 1 20000	Organisation/company:
RAFFD	
Address: 209 LIVERPOOK RD	Address:
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Signature:	Date: 25/2(19.
and you MIST include your details above	be accepted and that in order for your comments to be
	publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred m	ethod of communication. If no email address is provided

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罗A 54	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name and relevant part/secti	on)		
4. Do you o	consider the St Helen ead the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and the	ne Tests of Soundness
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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 sufficint 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



St Helens Borough Local Plan Madeleine Preston to: planningpolicy

13/03/2019 13:56

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



{In Archive} Local Plan Colin Preston to: planningpolicy

18/01/2019 18:16

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

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 and support any action needed to reverse any plan to use green belt land

Kind Regards

Mr & Mrs Preston 27 Fistral Drive Windle WA10 6EF

Sent from Colin Preston iPhone



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

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.

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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?

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

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:

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:

Res	oonse Date	3/2/2019 4:29:10 PM

EF0004 1 - LPAO6, 345



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?

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	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:
Signa	Date: 4th March 2019
Signa	4 March 2019
ease be aware that anonymous forms cannomments to be considered you MUST include	ot be accepted and that in order for your
ease be aware that anonymous forms cann mments to be considered you MUST include	ot be accepted and that in order for your le your details above. ure stages of the St Helens Borough Local e Plan for examination, publication of the

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To w	hich part	of the Local F	Plan do	es this repres	entation relate?			
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainabil Appraisal/ Strategic Environme Assessmer	ity x		Habitats Regulation Assessment
		s (please nan elevant part/se			- Companie			
Please i	read the G	uidance note f	or expla	nations of Leg	lan 2020-2035 al Compliance ai	nd the T	Tests	of Soundness
	Compliar	nt?	Yes			No 🗆		
Sound?			Yes	□ No		No 🗆		
Cooper	es with the ate	e Duty to	Yes	□ Don't kno	ow .	No 🗆		
Please I Positive Justified Effectiv	read the G ely Prepar d? e?	uidance note f red?	or expla		ecause it is not Tests of Soundn			
Consist	ent with N	National Polic	y? 🗆			10,000		
or fails	to comply vish to sur	with the duty	to coo	perate. Pleas	e be as precise	as po	ssible	ant or is unsound e. ease also use this
					re delightful to very			time of year – and se these.
	at, putting							uld other areas be hat is not kind or

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 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 Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) No. I do not wish to participate at the oral examination 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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EF0006



RE: Submission on local plan from DRPrice D&J Price

to:

planningpolicy 06/03/2019 10:49 () - LPAO6, 3HS

1 Attachment



lpsd-representation-form-from-DRPrice-March-2019.doc

Please accept attached.

From: 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

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Yours sincerely,



(See attached file: Statement of Representation Procedure.pdf)

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(For official use only)

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PART A - YOUR DETAILS

st Name:
st Name:
ganisation/company
ganisation/company:
dress:
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nail:
6 th March 2019
2

Would you like to be kept updated of future Plan 2020-2035? (namely submission of the P Inspector's recommendations and adoption of	lan for examin	
Yes (Via Email) YES PLEASE UPDATE ME BY EMAIL	No 🗌	M

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

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Local Plan

St. Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

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Telephone:

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

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3. To w	hich part	of the Local I	Plan do	es this repres	entation relate?		
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmenta Assessment		Habitats Regulation Assessment
		(please nan levant part/s			- Vicini 18-W-11-447		
					lan 2020-2035 is: al Compliance and		sts of Soundness
Legally	Compliar		Yes	☐ Don't kno	ow No		
Sound?				□ No			
	Complies with the Duty to Yes Cooperate		□ Don't kno	ow No			
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Effective							
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<u>or fails t</u> If you w	o comply	with the duty	to coop	oerate. Pleas	e be as precise as	possi	pliant or is unsound ble. please also use this
	e Greenfi						sidents of Rainhill. It rownfield sites are

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...

(1

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:

Than	k you for taki P	ing the time lease keep a	to comple copy for	ete and ret future refe	urn this erence.	response form.	
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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 4 APR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Melanie	First name:
First Name: Melonie Last Name: Price	Last Name:
Organisation/company:	Organisation/company:
Address: 6 Gordon Avenue, Ashkon in Makerfield, Wigan	Address:
Postcode: WN4 OQA	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 3.4.19
lease be aware that anonymous forms cannot be comments to be considered you MUST include you Would you like to be kept updated of future Plan 2020-2035? (namely submission of the P	our details above. stages of the St Helens Borough Local
Inspector's recommendations and adoption of	
Yes (Via Email)	No

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

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-

with the first of the

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

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

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

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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.

olicy	Paragraph	Policies	Istainability	Habitats Begyletien
	/ diagram		praisal/ rategic	Regulation Assessment
PAO5	/ table		nvironmental	Assessment
			ssessment	
ther docu	ments (please nan	ne		
locument a	and relevant			
art/section	1)			
		Demush Local Dian	2020-2035 is:	
. Do you c	consider the St Hel	ens Borough Local Plan for explanations of Legal C	ompliance and the	Tests of Soundness
Please read	me Guidance note	Yes 7	No	
egally Cor	приалия	Yes 🗆	No.X	
Sound?	with the Duty to	Yes 🗆	No C	
Cooperate				
Cooperate	s appropriate			
Please read Positively I Justified?	the Guidance note	lan is <u>unsound</u> , is it beca for explanations of the Tes	ts of Soundness	
		8		
Effective?				
Effective?	t with National Pol			

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.



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 the 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

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3. To which p	art of the Local F	Idil UUCS alis, I	Spicoci	ntation relate?	Habitats	
Policy LP AO6	Paragraph / diagram / table	Policies	1115	Sustainability Appraisal/ Strategic Environmental Assessment	Regulation Assessment	
Other docum document an part/section)	ents (please nam d relevant	16				
4. Do you co	nsider the St Held	for explanations	ocal Pla	Compliance and	Tests of Soundness	
Legally Compliant?			Yes 8		140	
Legally Com	pliant?	Yes 💌		1140		
Legally Com	pliant?	Yes 🗆		No	K	
Legally Com Sound? Complies wit	pliant? th the Duty to	Yes 🔼		1140	K	
Legally Com Sound?	pliant? th the Duty to	Yes 🗅		No	K	
Legally Com Sound? Complies wit Cooperate Please tick as 5. If you con Please read to	pliant? th the Duty to appropriate sider the Local P the Guidance mote	Yes The Yes Th	1. is it be	No No		
Sound? Complies wit Cooperate Please tick as	pliant? th the Duty to appropriate sider the Local P the Guidance mote	Yes The Yes Th	1. is it be	No No		
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Legally Com Sound? Complies wit Cooperate Please tick as 5. If you con Please read i Positively Pl Justified? Effective?	pliant? th the Duty to appropriate sider the Local P the Guidance mote	Yes D Yes D Yes D Yes D	1. is it be	No No		

6. Please give details of why you consider the Local Plan is not legally complianter is ansound 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

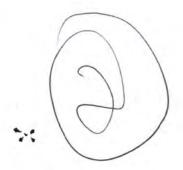
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that is one child too many.

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Please continue on a separate sheet if necessary

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Please continue on a separate sheet if necessary

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

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

8 If your regressment on its seaking a modification conjugation consider the case of a participate at the oral examination No, I do not wish to participate at the oral examination Yes, I wish to participate at the examination

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

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

Please keep a copy for future reference.



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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

069 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: 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 up Plan 2020-2035? (namely sub Inspector's recommendations	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the id adoption of the Plan)
Yes (Via Email)	No 🗌
	cil's preferred method of communication. If no e-mail act you by your postal address.



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1 3 MAY 2019

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1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: MR	Title:
First Name: HARRY	First name:
ast Name: PRICE	Last Name:
Organisation/company:	Organisation/company:
Address: 23 MARIGO BOLD Postcode: WA9 YEF	SLDWAY Address:
Postcode: WA9 UEF	Postcode:
0010000	Tel No:
	Mobile No:
	Email:
Signature:	Date:
omments to be considered you MU	
Would you like to be kept updat Plan 2020-2035? (namely submis Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🗹 (Via Email)	No 🗌



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1 3 MAY 2019

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)			
Title: MRS	Title:			
First Name:	First name:			
LYNDA				
LYNDA Last Name: PRICE	Last Name:			
Organisation/company:	Organisation/company:			
Address: 23 HARJGOLD WAY	Address:			
BOLD				
Postcode: WA9 4EF	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 Plan 2020-2035? (namely submission of the P Inspector's recommendations and adoption of	lan for examination, publication of the			
Yes ☐ (Via Email)	No 🗌			
Please note - e-mail is the Council's preferred address is provided, we will contact you by you	method of communication. If no e-mail ur postal address.			



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PART A - YOUR DETAILS

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

lease note that you must complete harts A and B or	This form.
Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
	First name:
Last Name: PRICE	Last Name:
Organisation/company: POUL MARKET CONFOUNDS	Organisation/company:
Address: 18 CRAWFORD STREET	Address:
Postcode: WA9 4XQ	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)

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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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.

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 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 Eccleston proposed for "safeguarding", Whilst Eccleston 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

66007/



Local Plan Objection HA8 Rookery/Higher Lane, Rainford carol P to: planningpolicy@sthelens.gov.uk 11/03/2019 23:44



3) - DIE

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



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

Ref: LPSD

0 1 MAR 2019

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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MD %	Title:
First Name: JANET	First name:
Last Name: PRICHARD.	Last Name:
Organisation/company:	Organisation/company:
Address: 42 SMODE LANE CALSWOOD Postcode: NN4 OSN	Address:
	Postcode: /
Tel No:	
Mobile N	
Email:	
Signature:	Date: 20 2 X .
	T T

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 upd Plan 2020-2035? (namely subm Inspector's recommendations ar	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Counaddress is provided, we will con-	I's preferred method of communication. If no e-mail ct you by your postal address.

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St. Helens Council

Town Hall Victoria Square St.Helens

Merseyside WA10 1HP

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Policy	Paragraph	Policies	Sustainability	Habitats
LIAOS Site	/ diagram / table	Map	Appraisal/ Strategic Environmental	Regulation Assessment
			Assessment	
	nts (please nam	ie		
document and	relevant			
part/section)				
A Do you cons	ider the St Hele	ne Porquah Local	Plan 2020-2035 is:	
			egal Compliance and the	Tests of Soundness
Legally Compli		Yes ☑	No 🗆	
Sound?	unt.	Yes □	No □	
Complies with	the Duty to	Yes 🗆	No 🗓	
Cooperate	Duty to		1,10 4	
Please tick as app	ropriate			
		an is <u>unsound,</u> is it		
		or explanations of th	ne Tests of Soundness	
Positively Prep	ared?	Ø		
Usitively i Tep				
		☑		
Justified?		N N		
Justified? Effective? Consistent with 6. Please give		y? 🗖	ocal Plan is <u>not legally c</u> ase be as precise as po	
Justified? Effective? Consistent with 6. Please give or fails to comp	details of why y bly with the duty upport the lega	ou consider the Lo		ossible.
Justified? Effective? Consistent with 6. Please give or fails to comp	details of why y bly with the duty upport the lega	ou consider the Lot to cooperate. Plea	undness of the Local P	ossible. Ian, please also use th
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7. Please set out what modification(s) you consider compliant or sound, having regard to the matter you elates to soundness (NB please note that any no incapable of modification at examination). You will he Local Plan legally compliant or sound. It will be buggested revised wording of any policy or text. P	ou have identified at 6. above where this n-compliance with the duty to cooperate is I need to say why this modification will make e helpful if you are able to put forward your
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

who have indicated that they wish to participate at the oral part of the examination



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)		
	Title:		
First Name: Government	First name:		
Last Name: Pgé	Last Name:		
Organisation/company:	Organisation/company:		
Address: 3 Lilas Ave Ashter in-makerfield	Address:		
	Postcode:		
Tel No:	Tel No:		
Mobile No:	Mobile No:		
Email:	Email:		
Signature	Date: 3/3/19		
lease be aware that anonymous forms canno onsidered you MUST include your details ab	ot be accepted and that in order for your comments to be pove.		
ould you like to be kept updated of future	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and		

Yes (via email)

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

RETURN DETAILS

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

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens

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 P	lan does this repre	sentation relate?	
Policy Paragraph/ diagram table P ADS BINGS Leyland G	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/sec			
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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.

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.

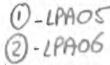
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,	Map A	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)	<i></i>		
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Thank you for taking the time to complete and return this response form.

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Please keep a copy for future reference.



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1 2 MAR 2019

Ref: LPSD

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
First Name: ८५१८ ১	First name:
Last Name: ('7 F	Last Name:
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	Tel No:
	Mobile No:
	Email:
Signature:	Date: 3/03/19
ease be aware that anonymous forms cannot be aconsidered you MUST include your details above.	ocepted and that in order for your comments to be
2018년 - 1일	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
Yes (via email)	⊠ No
ease note - email is the Council's preferred method will contact you by your postal address.	d of communication. If no email address is provided,

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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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. 10 Willelf part 0	f the Local Pla	n does this repre	sentation relate?	
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Other documents (document and rele		n)		
4. Do you conside Please read the 0	r the St Helens Guidance note t	Borough Local P	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
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Please tick as appre	opriate			
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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.

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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	ents (please name d relevant part/section	on)		
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Legally Comp	liant?		res TTNo	107
Sound?		= = 1	és FANO	
Complies with	the Duty to Coopera		es 🗐 No	
Please tick as	appropriate			
Please read Positively Prep Justified? Effective?	pared?	for explanations of	the Tests of Soundness	S
Consistent wit	n National Policy?			
or fails to c	omply with the duty to <u>support</u> the legal c to set out your co	to cooperate. Ple compliance or so mments.	al Plan is not legally of ease be as precise as bundness of the Local my ust for not be S	l Plan, please also
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Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Fitle: First name: Last Name: Organisation/company: Address:
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_ast Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:
7
Date: 9-3-19
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of the St Helens Borough Local Plan 2020-2035 cation of the Inspector's recommendations and
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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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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 th	is representation relate?
Policy Paragraph/ diagram table Policy Paragraph/ diagram table Policy LPAS Small Map	Sustainability Appraisal/ Strategic Environmental Assessment
Other documents (please name document and relevant part/section)	
4. Do you consider the St Helens Borough Please read the Guidance note for explan	Local Plan 2020-2035 is: ations of Legal Compliance and the Tests of Soundness
Legally Compliant?	Yes No.
Sound?	☐ Yes ☐ No
Complies with the Duty to Cooperate	☐ Yes ☐ No
Please tick as appropriate	
5. If you consider the Local Plan is unsou Please read the Guidance note for explan Positively Prepared? Justified? Effective?	
Consistent with National Policy?	
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9. If you wish to participate at the oral part of this to be necessary:	f the examination, please outline why you consider
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is

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

indicated that they wish to participate at the oral part of the examination

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3. To which part of the Local Pla	n does this repres	sentation relate?		
Policy Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section	on)			
4. Do you consider the St Helens Please read the Guidance note			e Tests of Soundness	
Legally Compliant?		Yes No		
Sound?		Yes ☑No		
Complies with the Duty to Cooper	ate 🔲 `	Yes □No		
Please tick as appropriate				
5. If you consider the Local Plan Please read the Guidance note				
Positively Prepared?		e e e e e e e e e e e e e e e e e e e		
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.				
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lease note the Inspector will determine the mos idicated that they wish to participate at the oral p	t appropriate procedure to adopt to hear those who have part of the examination

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

Please keep a copy for future reference.

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

9007568

1.8 APR 2019 32, The Pastures, STHELENS, WA9 4ZB.

Monday 15th April.

Dear Si Maday,

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 Best for howing.

As it stands now, the area of Bold is only TUST about coping with the amount of traffic in the area and there out int the intrastructure 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 babout run council wants to we green Belt as a courh cow.

I have little doubt that my connects will end up in the dust bin, but make no mistake - do not underestinate the feelings of local residents against this plan.

Stuga Lyke.

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



() - LPA04 3-Statement of Common Ground



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

Ref: LPSD

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
[2] H.H. T. T. H.H. H.H.H. H.H. H.H. H.H.	Title:
	First name:
	Last Name:
	Organisation/company:
Address: 16, Manoe Emb	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
<u> </u>	
Signature:	Date: 25 02 2019
	F 777 1770
	ot be accepted and that in order for your comments to be
onsidered you MUST include your details ab	
	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	□ No
7. N. 17. N. P. N. P. N. P. N.	method of communication. If no email address is provided

we will contact you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

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			n does this repre	Sentation relate:	
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Sound	?			Yes Avo	
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0 5 MAR 2019

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	Title:
	First name:
Last Name: ペッシン	Last Name:
	Organisation/company:
Address: 16, Manor Road	Address:
HADOCK	
Postcode: WAII OLW	Postcøde:
	Tel No:
	Mobile No:
	Email:
	Date: 25, 02, 2019.
Signature:	Date. 201
considered you MUST include your details about	
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred	method of communication. If no email address is provided.

we will contact you by your postal address.

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3. To wh	ich par	t of the Loca	l Plan d	loes this r	epresenta	tion relate?			
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Sound?					Yes	□ No	. [ENT. Know)
Complie	s with th	ne Duty to Co	operate		Yes	No),O1. 1,00a	
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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

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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RO1467







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1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: WS	Title:
First Name: CHRISTINE	First name:
Last Name: Quiph	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 2 GAUSTON AVE. RAININU.	Address:
Postcode: L35 ory,	Postcode:
	Tel No:
	Mobile No:
	Email:
\$ignature:	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 update Plan 2020-2035? (namely submiss Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the
Yes x□ (Via Email)	No No
Please note - e-mail is the Council address is provided, we will contact	's preferred method of communication. If no e-mail at you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:00pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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Telephone:

01744 676190

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

PART B - YOUR REPRESENTATION

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

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

4. Do you consider the St He Please read the Guidance note	lens Borough Local Plan 20 for explanations of Legal Con	020-2035 is: opliance and the Tests of Soundness
Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

5. If you consider the Local Please read the Guidance no	I Plan is <u>unsound,</u> is it because it is not: te for explanations of the Tests of Soundness
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Po	olicy? X

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

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

WE HAVE WORKED PRETHER ON THIS

(<u>a</u>)

SUBMISSION.

WE GIVE OUR EXPLICIT PERMISSION FOR

OUR PAME TO BE ATTACHED TO!, CHEISTA

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NAME	ADDF	RESS	SIGNATURE	DATE	QUIN RESPONSE
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,					
		Services (Services)			

- 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. 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.

RO1468



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



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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
- [18]	Title:
First Name: ELS IE	First name:
Last Name: Quiru.	Last Name:
Organisation/company: N/A	Organisation/company:
	Address:
HAYDOUL STHELENS	
Postcode: WAII OBP	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No
Email:	Email:
Signature:	Date: 25/2 2019
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Please be aware that anonymous forms cannot considered you MUST include your details abo	be accepted and that in order for your comments to be ve.
	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred r we will contact you by your postal address.	method of communication. If no email address is provided,

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or by hand delivery to: Ground Floor Reception

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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 w	hich pa	rt of the Local Pla	an does this repre	sentation relate?	
Policy	LPA -05 SITE- 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
		nts (please name relevant part/secti	on)		
				Plan 2020-2035 is: Legal Compliance and t	he Tests of Soundness
Legally	Compli	ant?		Yes ☐ No C	ION T KNOW.
Sound	?			Yes 🗹 No	
Compl	ies with t	the Duty to Cooper	rate	Yes No	
Please	tick as a	appropriate			
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1800756M

RO1469



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Ref: LPSD 0 1 MAR 2019 (For official use only)

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Part A - Personal Details

Part B - Your Representation(s)

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1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	- 1 1 1 1
	Title:
First Name: NORMAN	First name:
Last Name: COLLIPE	Last Name:
Last Name.	Organisation/company:
1 200005511	AY Address:
Address: 4 DEOORSIDE CU	Address.
HAYDOCK	
St. HELENS	
Postcode: WALLOBP	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 25 2 (9
considered you MUST include your details abo	t be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? n, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided

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Complies with the Duty to Cooperate Yes No No No No No No No N	Other documents (please name document and relevant part/section) I. 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? Complies with the Duty to Cooperate Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? 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.	. To w	hich par	rt of the Local Pla	an does this repre	sentation relate?	
Legally Compliant? Sound? Yes No Complies with the Duty to Cooperate Yes Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.	4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness Legally Compliant? Yes No OONT KNOON Complies with the Duty to Cooperate Yes No Please tick as appropriate 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness Positively Prepared? Justified? Effective? Consistent with National Policy? 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	Policy	-05 51TE-	diagram	7 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0	Appraisal/ Strategic Environmental	Regulations
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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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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.

RO1470



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

Ref: LPSD

1 3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: 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	
Signature:	Date: 12.03.2019

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

Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Plan pector's recommendations and adoption of	lan for examination, publication of the
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-

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PART B - YOUR REPRESENTATION

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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 overplanning 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.

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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RO1471



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First Name HOWARK Last Name: RAILTON	First name:
Last Name: RAILTON	Last Name:
Organisation/company:	Organisation/company:
Address: 50 WAREMONT ROAD, BILLINGE	Address:
Postcode: WN57LT	Postcode:
1 odlodd. 17 17 g F	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 10/03/19

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

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Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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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 modificate the oral part of the examination? (the hearings	ion; do you consider it necessary to participate at in public)
No, I do not wish to participate at the oral examination	

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

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

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

Please keep a copy for future reference.

RO1472

a		WF003-
1 LPAOI	@LPA04	@LPADS.1
@ LPA 02	B LPA04.1	1 LPAO6
3 LPA03	6 LPA05	@ LPAOT

1.5
10

Would you like to be kept updated of future stages of the St Helens Borough 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)

Representor Details

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?	Jean 1 Iun 2020-2033.
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):

- 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.

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

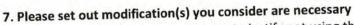
There are therefore no exceptional circumstances to change Green belt boundaries Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

10

(10)

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

Traffic & congestion are already a serious issue for Rainford residents, with the village 1.7 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.



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 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.

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 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 LPAO1, 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







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I am opposed to needless release of Green Belt land for employment uses

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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.

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Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

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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

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:

3/13/2019 4:27:25 PM Response Date





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)

Yes (via e-mail)

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

Policy	- spresentation relate:
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

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):

- 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.
- e) There are no exceptional circumstances to justify not using the standard method to calculate housing need
- f) The economic analysis is flawed and based on over-optimistic assumptions
- g) The level of land needed for housing and employment is therefore not as high as set out in the Plan
- h) There are therefore no exceptional circumstances to change Green belt boundaries

2)

Other reasonable alternatives have not been fully explored, including lower target figures J) 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 K) statement(s) of common ground.

Traffic & congestion are already a serious issue for Rainford residents, with the village L) 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.



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

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

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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.

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Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

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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.

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

6







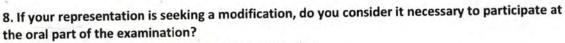
land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

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.



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

Ref: LPSD

1 3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

2. Your Agent's Details (if applicable) (we will correspond via your agent)	
Title:	
First name:	
Last Name:	
Organisation/company:	
Address:	
Postcode:	
Tel No:	
Mobile No:	
Email:	
Date: 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 upo Plan 2020-2035? (namely subr Inspector's recommendations a	lated of future stages of the St Helens Borough Local nission of the Plan for examination, publication of the nd adoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Couladdress is provided, we will cor	ncil's preferred method of communication. If no e-mail stact you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall Victoria Square St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

Policy	h part of the Local P Paragraph	Policies	Sustainability	Habitats	
5.00	/ diagram / table	Мар	Appraisal/ Strategic Environmental Assessment	Regulation Assessment	
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	as appropriate				
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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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:			

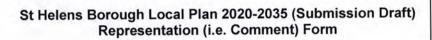
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RO1474





Ref: LPSD

13 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

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/company:	
Address:	
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.

Would you like to be kept upda Plan 2020-2035? (namely submit Inspector's recommendations an	sted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the dadoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Councilland address is provided, we will cont	cil's preferred method of communication. If no e-mail act 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-

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

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.

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RO1475



Local plan Cheryl Rank

to:

planning policy @sthelens.gov.uk

11/03/2019 14:46

1 Attachment



lpsd-representation-form CR.doc

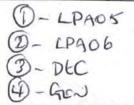
Sent from my Samsung device

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Date: 11/03/2019 2:44 pm (GMT+00:00)

Subject: lpsd-representation-form CR





Ref: LPSD

(For official use only)

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

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Last Name:
Organisation/company:
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Email:

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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 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.

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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
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land also have established public rights of way across the land.

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Omits the impact the plan will have on healthcare and education. No reference to collaboration with hospital trusts, CCG;s and education. 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.
Please continue on a separate sheet if necessary

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

suggested revised wording of any policy or text. Please be as precise as possible.

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

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Unsafeguard the 8HS site and keep it as agricultural land.

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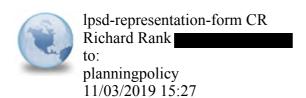
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

If your representation is seeking a modification; do you consider it necessary to participate a 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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RO1476



1 Attachment

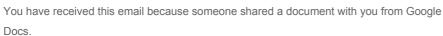


lpsd-representation-form CR.pdf

has attached the following document: × lpsd-representation-form CR

Google Docs: Create and edit documents online.







Sinc 8HS Ff0020 O- LPAOS 2- LPAO6 Ref: LPSD 3-DEC (4) - GEN

EMBED MSPhotoEd.

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

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Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	 Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Richard	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
Address: 94 St Georges Avenue Windle	Address: Postcode:
Postcode: WA10 6HD	Fosicode.
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

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

Would you like to be kept updated of future stages of the St Helens 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 <u>5pm on Wednesday 13th March</u> 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

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Policy	x	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	x
	ent and	ents (please name d relevant	9				
4. Do ye	ou con	sider the St Hele e Guidance note fo	ns Borough Local	Plan 2020-2035 is:	the Te	ests of Soundness	
Legally			FEW L		X .		
Sound?					X		
Cooper		the Duty to		□.	X		
Please tid	ck as ap	propriate			law i		
5. If you	consi	der the Local Pla	n is <u>unsound,</u> is it	because it is not:	6181		EVE
			r explanations of th	e Tests of Soundness	S		
Positive		pared?				•	
Justified	The second	avair shemman		no the plan is based on flawed methodology			
Effective	-			s not deliverable			
Consist	ent wit	th National Policy	no it does not comply with NPPF 2018				
or fails t	to com	ply with the duty	to cooperate. Plea	ocal Plan is <u>not lega</u> ase be as precise as undness of the Loca	s pos	sible.	

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.

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 collaboration with hospital trusts, CCG;s and education.
 books to new patients and others are also over subscribed. Most schools in the area of
 Ecclestone and Windle are already oversubscribed.







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

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No, I do not wish to participate at the oral examination	
9. If you wish to participate at the oral part of the exa	amination, please outline why you consider
uns to be necessary.	
Please note the Inspector will determine the most a	

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.

RO1477



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

Ref: LPSD

1 2 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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title: NORTHERN TRUST LAND EXEC
	First name: STEPHEN
Last Name: RATCLIFFE	Last Name: GLENN
Organisation/company:	Organisation/company:
LAND OWNER	NORTHERN TRUST
	Address: LYNTON HOUSE
RAINFORD	ACKHURST PARK, CHORLEY
	LANCS
	Postcode: PRT 1NY
Signature:	Date: 11 March 2019
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future so (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? I, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred new will contact you by your postal address.	nethod of communication. If no email address is provided,

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Local Plan

St.Helens Council

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or by hand delivery to:

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

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3. To which	part of the Local Pla	an does this repre	sentation relate?		
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	~
	iments (please name and relevant part/secti		LEAR OF 524 FLE ST. HELEN LAP 1N	5	R
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundnes	S
Legally Cor	mpliant?		Yes 🗹 No		
Sound?	124 7 2 7 1		Yes 🗹 No		
Complies v	vith the Duty to Coope	rate	Yes 🗹 No		
Please tick	as appropriate				
Positively P Justified? Effective?		for explanations o	f the Tests of Soundness		
Consistent	with National Policy?				
or fails t	o comply with the du	ty to cooperate. <u>F</u> al compliance or	cal Plan is <u>not legally co</u> Please be as precise as possible as possible coundness of the Local I	ossible.	nd
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relate incapa the Lo	s to soundness able of modifica ocal Plan legally	(NB please note the tition at examination compliant or sour	nat any no on). You wi nd. It will I	ou have identified at 6. above where this n-compliance with the duty to cooperate is Il need to say why this modification will make be helpful if you are able to put forward your Please be as precise as possible.
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				Please continue on a separate sheet if necessa
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

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 with your council representative with your council representative 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 15 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

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. 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



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1 2 MAR 2019

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	First name:
	Last Name:
Organisation/company:	Organisation/company:
RAINERS	Address:
	Postcode:
Tostoode.	Tel No:
	Mobile No:
	Email:
Signature:	Date: 11 Magen 2019
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be
	stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and
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.

Policy	Paragraph/ diagram table	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	1	Habitats Regulations Assessment
	ments (please name and relevant part/section	on)				
	consider the St Helen ad the Guidance note				d the T	ests of Soundness
Legally Cor	mpliant?		☐ Yes	☑ No		
Sound?			☐ Yes	☑ No		
Complies w	ith the Duty to Cooper	ate	☐ Yes	☑ No		
Please tick	as appropriate					
Positively Programmer	repared?					
Consistent	with National Policy?					
or fails to	ive details of why you o comply with the dut sh to support the lega box to set out your co	y to cooperat al compliance	e. Pleas	e be as precise a	s poss	ible.
See AT	THCHED SHEET	S				

rela inca the sug	npliant or sound, having regard to the mater to soundness (NB please note that a pable of modification at examination).	nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make it will be helpful if you are able to put forward your rext. Please be as precise as possible.
Þ	ed Attrached Sheets,	
		Please continue on a separate sheet if necessar
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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.

Why I believe the proposed site for housing is totally perceived in St Helens Local Plan to be flowed.

1 The site

@ Is next to existing industrial estate

(6) Is next to a proposed new area for industrial use

(6) The site should be used as a sound barrier which it has been for years to protect Higher have Rooken have and the Rockens estate from sound from the existing industrial estate of the proposed new industrial estate

(d) There has been a case in recent years that the residents on Higher have wan an injunction against a manufacturing und on the industrial unit which could the business to

relocate losing employment to the area

@ If the residents of the new homes started complaining about noise which some of the factories work 24 hrs por day of they ason an injunction on restricted hours would this not reduce

employment in the area

(f) If there was a fire at any of the pints which there has been in the last 12 months which was declared a major incident would it not affect the hopes which were built new them

g) The site now of providing work for the local people of redundancies would have to be made at the local form that is farming the field

B) The land is grade I agricultural land , once its gone they are not growing anymore food. It is government policy to grow our own

1) Once the land is taken for housing it cannot be replaced I The site is not for from holiday moss tip

2	Public Transport
0	St. Malens - Buses every hour
	Ormskirk - No bus sarvice
	Liverpora - No bus sorvice
	Warrington No bus service
	Wigand - No bus seince
	Kirthy - No bus serince
	Randway - No Station
10	V
3	Schouls
a	Rainford of No extension can be made without taking playing
Pi.	fulds
b	Compus Christie - dutto
5	Brook hadge - detto
a	Rainford fligh 5 chool can only be extended by taking Gradel
	agricultural land
9	Health Service
0	Mc Crea Medical Contre campot be extended or car park
_	restrictions
(b)	Higher Lane Medical Certies - dutto
5	Police
	They are selling Police Station of there is no police station
2	Fire Service
	The reasest five station in Eccleston is being relocated to the certie of St. Helens
	C)

7. Transport in + out of the village

@ from Rooken, have trace to a bad juration at the intersection of Rooken, have + Church Road A to get to the Rainford Bypasse you author have to go up through the village or through the one way system in Thickwood Moss & a difficult junction with Massborners Road Massborrage Road.

(b) Getting back into the village there are difficult jurch as between Mossborough Road or Church Road or Rooking lane or church Road. Also of you come in the other way from Mill have there is a difficult function between Higher Lane or Mill borne. Mul borne

It you come into Rounford in a Pasture land it is a difficult junction crossing the Rounford By Pass there has been mady accidents those

- (8) There is no fortigoth on one side of Rookery lane of there is a bad
 - The drainage system in both Rooley have of Mill have 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 anymore vehicles

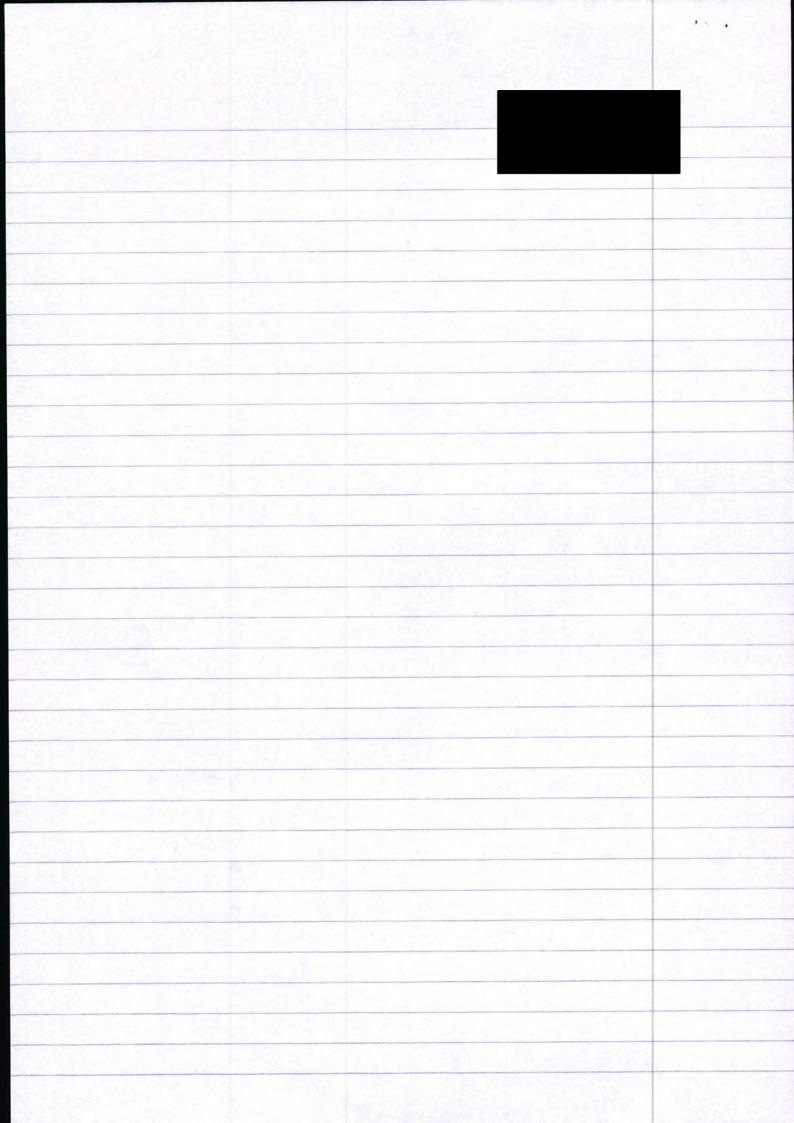
10 Why I believe St. Helens is wrong to accept this site

there are other sites in the borough that have not been taken out of the green belt that are not producing cups of

providing employment

I believe this site has been down in Rainford to get

extra rates



RO1479



493 12 MAR 2019

2 Your Agent's Details (if applicable)

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

1 Your Details

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

的一种,我们就是一个人的,不是一个人的。	(we will correspond via your agent)
Title: n L	Title:
First Name: CARISTOPHER	First name:
Last Name: RATCLIFFE	Last Name:
Organisation/company:	Organisation/company:
Address: 296 Scot LANE	Address:
WIGAN	
Postcode: WNS 9TA	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 5-3-19

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

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

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

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

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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.

	art of the Local F	Plan does this repr	esentation relate?	
Policy HA LPAS	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other docume document and part/section)	ents (please nam relevant	ne		
			Plan 2020-2035 is:	
			egal Compliance and the	Lests of Soundness
Legally Compl	iant?	Yes 🗆	No 🗆	
Sound?	W- D. t. t.	Yes 🗆	No 🗆	
Complies with	tne Duty to	Yes □	No □	
Cooperate	nensiata			
Please tick as ap	propriate			
5 If you consid	der the Local Pla	an is <u>unsound,</u> is it	herause it is not	
			e Tests of Soundness	
Positively Prep		or explanations of th	e resis or soundress	
Justified?	Jaieu !	1		
Effective?		7		
	h National Polic	2 2		
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or fails to comp If you wish to set out	ply with the duty support the lega your comments	to cooperate. Plea	ocal Plan is not legally case be as precise as poundness of the Local Plan	ssible. an, please also use th
			verte fine	,
Fami	3			

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you conside compliant or sound, having regard to the matter you relates to soundness (NB please note that any nor incapable of modification at examination). You will the Local Plan legally compliant or sound. It will be suggested revised wording of any policy or text. Pl	n-compliance with the duty to cooperate is need to say why this modification will make helpful if you are able to put forward your
Remove 12 from	m proposition greenbett
Please note your representation should cover suc supporting information necessary to support / justi modification, as there will not normally be a subse representations based on the original representati	ify the representation and suggested equent opportunity to make further
After this stage, further submissions will be on matters and issues he/she identifies for example. If your representation is seeking a modification; the oral part of the examination? (the hearings in part of the examination?)	and the request of the Inspector, based amination. do you consider it necessary to participate at
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of the enhis to be necessary:	examination, please outline why you consider

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

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3. To which p	art of the Local Pl	an does this repr	esentation rela	te?	
Policy HS LPAO	Paragraph/ diagram table	Policies Map	Sustaina Appraisa Strategio Environn Assessn	al/ c nental	Habitats Regulations Assessment
	ents (please name d relevant part/secti	on)			
	nsider the St Helen d the Guidance note				Tests of Soundness
Legally Comp	oliant?		Yes	MO No	
Sound?			Yes	No	
Complies with	the Duty to Coope	rate	Yes	No	
Please tick as	appropriate				
Justified? Effective? Consistent wit	th National Policy?				
or fails to d If you wish use this bo	comply with the du to support the leg ox to set out your c	ty to cooperate. al compliance or omments.	Please be as pro	ecise as pos	3 7 7 7 7 7 7 7
MIIGE	5 LAND				

(7) Remove 100 fin proposed removed for Greankelt

848 (1)-LPAOS

Ref: LPSD



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www.sthelens.gov.uk/localplan

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PART A - YOUR DETAILS

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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First Name: CAROLINE	First name:
Last Name: RATCLIFFE	Last Name:
	Organisation/company:
Address: 40 Canscield Street St Helens	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12/03/19
lease be aware that anonymous forms cannot be onsidered you MUST include your details above.	accepted and that in order for your comments to be
ould you like to be kept updated of future stage	ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and
Yes (via email)	No
lease note - email is the Council's preferred met	hod of communication. If no email address is provided,

RETURN DETAILS

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St.Helens Council

Town Hall

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St Helens WA10 1HP

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Policy IHA LPAS	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	ments (please name nd relevant part/secti	on)		4
4. Do you co	onsider the St Helen ad the Guidance note	s Borough Local I for explanations of	Plan 2020-2035 is: Legal Compliance and t	he Tests of Soundness
Legally Com	ipliant?		Yes No	
Sound?			Yes No	
Complies wi	th the Duty to Cooper	ate 🔲	Yes No	
Please tick a	as appropriate			
Positively Pro Justified? Effective?	epared?		the Tests of Soundness	
	vith National Policy?	u consider the Lo	cal Plan is not legally co	empliant or is unsound
If you wis		al compliance or s omments.	prevent	#15 A TO A T
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	Please continue on a separate sheet if necessar
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	ments (please name and relevant part/sectio	n)		
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Legally Cor	mpliant?		es No	
Sound?		□ Y	es No	
Complies w	vith the Duty to Coopera	te 🔲 Y	es No	
Please tick	as appropriate		x == 1	
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Effective?				
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6. Please gi	그들이 그 사용에 그 집에서 요한다고 생이고 있는 것이 되었습니다. 그 그 사람들이 그렇게 되었다.		al Plan is not legally comease be as precise as po	
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6. Please gi or fails to If you wis use this I	comply with the duty th to support the legal box to set out your cor	to cooperate. Ple compliance or so nments.	ease be as precise as po	ssible. an, please also

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

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1158 HAM 2015

PART A - YOUR DETAILS

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

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



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).

2 MAY 5018

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: SUSAN	First name:
Last Name: RATCLIFFE	Last Name:
Organisation/company:	Organisation/company:
Address: 33 CRAWFOND ST ST HEZENS Postcode: WMA LXA	Address: Postcode:
, 5/1-1	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.

	the Plan for examination, publication of the on of the Plan)	
Yes (Via Email)	No 🗌	
Please note - e-mail is the Council's prefe address is provided, we will contact you b	erred method of communication. If no e-mail by your postal address.	



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Part B - Your Representation(s).

1091 13 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name:	First name:
Last Name: Rattigan.	Last Name:
Organisation/company.	Organisation/company:
Address: 559 CLOCK Face Road Bold, St. Helens	Address:
Postcode: WA9 LUO	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	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.

Plan 2020-2035? (namely submisspector's recommendations a	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Cou address is provided, we will cor	's preferred method of communication. If no e-mail et you by your postal address.



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

13 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JAMES	First name:
Last Name: RATTIGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 559 CLOCK FACE ROAD BOLD, ST. HELTNS	Address:
Postcode: WA9 44Q	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	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 up Plan 2020-2035? (namely sul Inspector's recommendations	lated of future stages of the St Helens Borough Local nission of the Plan for examination, publication of the nd adoption of the Plan)
Yes (Via Email)	No 🗌
	ncil's preferred method of communication. If no e-mail tact you by your postal address.

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, 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 trafic 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,

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	

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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	

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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,

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

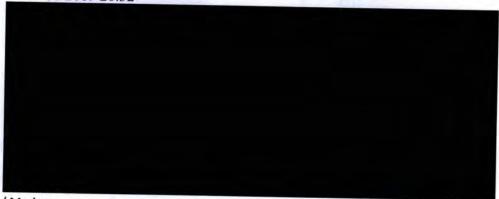
Response Date	3/13/2019 3:21:37 PM
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{In Archive} St Helens Local Plan 2020-2035 Submission Draft & Parkside Planning Application P/2018/0048/OUP john.rea@mail.com

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 (16^{th} 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:-

01

- 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 & EMMISIONS 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.

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









Ref: LPSD

1 1 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 <u>5pm on Wednesday 13th March</u> 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.

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)			
Title: MRS	Title:			
First Name:	First name:			
Last Name: REA	Last Name:			
Organisation/company: N/A	Organisation/company:			
Address: 182 Two BUTT CANE RAINHILL, PRESENT RERSEYSINE	Address:			
Postcode: L35 &PT	Postcode:			
	Tel No:			
	Mobile No:			
	Email:			
Signature:	Date: 06 03 19			
lease be aware that anonymous forms cannot bomments to be considered you MUST include y				
Would you like to be kept updated of future Plan 2020-2035? (namely submission of the P Inspector's recommendations and adoption of	lan for examination, publication of the			
Yes x☐ (Via Email)	No 🗆			
Please note - e-mail is the Council's preferred	method of communication. If no e-mail			

RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:00pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

PART B - YOUR REPRESENTATION

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

3. To w	hich part	of the Local I	Plan does	s this represe	ntation relate?			
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment	
		s (please nan levant part/s						

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

Please tick as appropriate

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

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

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

· We	believe	the	hocal	Plan	60 be	unsoc	end 11
beca	believe ane of	the '	in Creces	sed tr	affic	Chal	will
be	Serv	ataled	01	alread	y m	ussivleu)
Con	gested	Roads	ano	und E	The E	ccleste	<u> </u>
	_						
P	and Cra	off O	and	510.			

the boundary of the Godf Course that we have first hard experience of the amount of traffic using all the Surrounding roads have and will increase, operably at rush hour, am and &m, School traffic, hospital visiting hours, all of this impodes on very very bees and consected raids alreads There is limited parking around this area as it is and with parked cars and Nesidents cars, diving on all roads in the area and Surrounding areas is becoming a massive problem. · There has in reant monts been 3 New building developments in Scotchban Lare, which is the Continuation of Two Bell lare, this has already hada mossive impact of increased travel and is now becoming very time consuming Please Cel attached S

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 Bult · Lane onto Delph lone. hazard for us as pedestrials walking up two Butt Cone · as traffic is increasing and · Ketoside, so with more cas using The Care this prodom will only magnify and increase vist to life. · In our opinion we believe that the infrastructure is already at breaking Bint in the area with regards to traffic and polution and we do not believe that the . increase in traffic that this • Local Plan in Suggesting will be sustainable · As local residents in air exponende we feel that our

Hospitals cannot appen with the n crease of population us have expensed fist hand, when much awaited hopital appointments have been canallod because the Hospital cart cope so where is the reasoning behind an in crease in local posidents keing slotted into an aready Strugsling NHS · As posidents that Flooding will be one ue tal a future mussive problem Us psidents are expending flooting already Some of our homes are below to road so we have Some flooding with heavy rain and in our opinion we feel Houses opposite our homos will only increase the sixts of more Sonous Flording

· we believe that we need 'Creen Balk' for our health and well being to walk with noture. If this " Urban Spraw" is allowed to continue, then it will be gone forces.

• De are all amare of the implications of large and Halshad Charden Village and how it will impact the local area, it will be in possible to got to any where in a timber manner because we the amount of traffic that with for sure bing the Surrounding roads to a Stand still. · We have all experienced problems travelling around Rainhill and Eccleston Pak, opecially friends and family who are very frustraded

in battlein traffic and ques now with out hundreds potentially thousand more const. It is becoming difficult parting in and around Rainhill and Surrounding areas beening like travelling around a City Centre 111 SAVE OUR GREENBELT 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. 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.

NAME PHILIP REA PRIN	TNAME PHILIP REA
ADDRESS	
	DATE 06/03/2019
SIGNITURE	
I give explicit permission for my name t	to be used in this response.
NAME Any Holding PRIN	T NAME
ADDRESS	
	DATE 7/3/19
SIGNITURE	
I give explicit permission for my name	to be used in this response.
B. NAME N Holding PRIN	IT NAME N Holding
ADDRESS	
ADDRESS	DATE 07/03/18
SIGNITURE	
I give explicit permission for my name	to be used in this response.
4. NAME P.J. McGONAM PRI	NT NAME PAUL TOPPH MCGONDAN
ADDRESS	
	DATE 10/03/2019
SIGNITURE	

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

RO1488

Page 1 of 1 EFOO40



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

Date: 12/03/2019 14:57 (GMT+00:00)

To:

Subject: lpsd-representation-form

Sue Redman

19 Clipsley Crescent

Haydock

St Helens

Merseyside



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1. Your Details	Your Agent's Details (if applicable (we will correspond via your agent)	
Γitle: 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	
ease be aware that anonymous forms canno mments to be considered you MUST include		

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St. Helens Council

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01744 676190

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

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	part of the Local Pla	Policies	Sustainability	Habitats	
Policy LPA05 Site 2HA	Paragraph / diagram / table	Мар	Appraisal/ Strategic Environmental Assessment	Regulation Assessment	
	ments (please name and relevant i)				
	onsider the St Helen the Guidance note for		Plan 2020-2035 is:	Tests of Soundness	
Legally Cor	mpliant?	Yes	No 🗆	Don't know	
Sound?		Yes	No □\	17 1-19 19 19 19 19 19 19 19 19 19 19 19 19 1	
Cooperate	rith the Duty to	Yes	No 🗆	H	
	nsider the Local Plan				
			ne Tests of Soundness		
Positively P Justified?	repared?				
Effective?					
	with National Policy?				
or fails to co	omply with the duty to	o cooperate. Plea	ocal Plan is <u>not legally case be as precise as po</u> undness of the Local Pla	ssible.	
Not justifie	d - the Council shou	ald be put to stric n in decline sinc	t proof of its population e 1981. Where are all ti	estimates. The ——— ne extra people coming	
	this area isn't sustair other services. The		lack of school places, of		

Access to site - extra volume of traffic in an already conjested area. Daily traffic conjestion

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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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)

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RO1489



Fwd: lpsd-representation-form (SR) susan redman

to:

planningpolicy@sthelens.gov.uk 12/03/2019 15:23

Hide Details

From: susan redman

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



lpsd-representation-form (SR).doc

Sent from my Samsung Galaxy smartphone.

----- Original message ----

From: Sue Redman

Date: 12/03/2019 15:18 (GMT+00:00)

To: "

Subject: lpsd-representation-form (SR)



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	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:	
ease be aware that anonymous forms canno omments to be considered you MUST include Would you like to be kept updated of future Plan 2020-2035? (namely submission of the	your details above. re stages of the St Helens Borough Local	
Inspector's recommendations and adoption of	of the Plan)	
Yes √ (Via Email)	No	
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RETURN DETAILS

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

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Pla	an does this repre	esentation relate?	
Policy Paragraph / diagram / table 2HA	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 Helen Please read the Guidance note for	s Borough Local	Plan 2020-2035 is:	Tests of Soundness
Legally Compliant?	Yes		Don't know
Sound?	Yes	No □v	
Complies with the Duty to Cooperate	Yes □	No □√	
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Justified?			(4)
Effective?			
Consistent with National Policy?			9
6. Please give details of why you or fails to comply with the duty to lif you wish to support the legal of box to set out your comments	cooperate. Plea	ise be as precise as pos	ssible.
Access to site – extra volume and on a daily basis traffic around this area. The access to the site is inadequand the proposal for a junction a on an already overstretched high the proposed development.	have to cope wate, a left in/left tiverpool Road	out from the East Lanca and Vicarage Road wo	by the amount of ashire Road isn't safe uld put additional traffic

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

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

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RO1490



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

Ref: LPSD

13 MAY 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

PART A - YOUR DETAILS

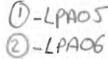
Please note that you must complete Parts A and B of this form.

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MiSS	Title:
First Name: John NA	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: 16 Beganin Grapas	Address:
Postcode: WA9 4FT	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	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 upon Plan 2020-2035? (namely subn Inspector's recommendations a	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the data adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Cour address is provided, we will con	il's preferred method of communication. If no e-mail act you by your postal address.

RO1491



1 2 MAR 2019

Ref: LPSD

PFO47





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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	Title
First Name: LANSTANTINGS	Title:First name:
Last Name: RENTOUN'S	Last Name:
	Organisation/company:
Address: Y KESWICK RD	Address:
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Please be awa considered you	epted and that in order for your comments to be
	publication of the Inspector's recommendations and
Yes (via email)	(No)
Please note - email is the Council's preferred me	ethod 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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Please use a separate copy of Part B for each separate comment/representation.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Pla	n does this repre	sentation relate?	
Policy PA5 Paragraph/diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section	on)		
4. Do you consider the St Helens Please read the Guidance note			ne Tests of Soundness
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

Please keep a copy for future reference.

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3. To which	part of the Local Pla	an does this repre	sentation relate?	
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Sound?			Yes No	
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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?

All

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.

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-Apron'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

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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.

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. 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.

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	

RO1493





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

Ref: LPSD

2 8 FEB 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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: M.K.	Title:
	First name:
	Last Name:
Organisation/company:	Organisation/company:
CLOCK FACE	Address:
	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: 114 1	Email:
Signature:	Date: <u>L 7 02 7.019</u>
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	accepted and that in order for your comments to be
Would you like to be kept updated of future stag (namely submission of the Plan for examination, pul adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No

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

RETURN DETAILS

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Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

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:

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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.

Policy	Paragraph/ diagram	Policies Map	Sustainability Appraisal/	Habitats Regulations
	table	5HA	Strategic Environmental Assessment	Assessment
	uments (please name and relevant part/secti	on)		
	consider the St Helen ead the Guidance note		Plan 2020-2035 is: f Legal Compliance and th	ne Tests of Soundness
Legally Co	mpliant?		Yes No	
Sound?			Yes No	
Complies v	vith the Duty to Cooper	rate	Yes 🔽 No	
Please tick	as appropriate			
	onsider the Local Plane ead the Guidance note		because it is not: f the Tests of Soundness	
Positively P	repared?			
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Effective? Consistent 6. Please gor fails t	jive details of why yo o comply with the du	u consider the Lo	cal Plan is <u>not legally co</u> lease be as precise as pe	ossible.
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE MODIFICATIONS I PEEL ARE NECESSARY ARE TO LEWE THIS GREEN BELT LAND, AS CAREEN BELT LAND, AS CAREEN BELT LAND, AND TRY HUMBY TO LANDSCAPE IT, AND MAKE IT A KIND OF COUNTRY PARK, WHICH WE COLLD ALL ENJOY, LEAVE THE CORRENT WILD LIFE TO HELD THE ENVIROMENT.

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:

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A BORN & BRED CLOCKER AND TAKE WHAT
HAPPENS TO DUR VILLIAGE VERY SERIOUS,
AND FEEL THE PROPOSED FLANS 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.

In particular, this Council supports the St Helens tocal 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.

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





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

RO1495





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

Ref: LPSD

1 3 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

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

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MC	Title:
First Name BILLY	First name:
Last Name: LICMARD SON	Last Name:
Organisation/company:	Organisation/company:
Address: JA VIC ALAGE TERR NEWT MOAD,	Address:
Postcode: CA 9 3PL	Postcode:
Fosicode: Cr. 2	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 upda Plan 2020-2035? (namely submit Inspector's recommendations an	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the data adoption of the Plan)
Yes X (Via Email)	No 🗌
Please note - e-mail is the Counciliation address is provided, we will conti	cil's preferred method of communication. If no e-mail act you by your postal address.
addiess is provided; ite	

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4. Do yo	ou consider the St Heler ead the Guidance note fo	r explanations of	Legal Compliance and the	Tests of Soundness
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or fails	to comply with the duty	to cooperate. <u>H</u>	Local Plan is <u>not legally</u> Please be as precise as p	ossible.
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Green E	Belt, is more vulnerable to de	velopment without	the protection of an up to date	e, adopted local plan.
Nationa a) Posit b) Justif would e c) Effect d) Cons	I Planning Policy Framework ively prepared – In fact too pried – jobs and housing numberode 'exceptional circumstar	((February 2019) (lositive, leading to bers are over estimates; more effective if the there are some pol	AVAF-NIZINDINI INI 1005 AUU 1100	using. se is possible, these combined on a brownfield preference.

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LPA01 Presumption in Favour of Sustainable Development

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

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

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

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

Policy LPA02: Spatial Strategy

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

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

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

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

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

Policy LPA03: Development Principles

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

Policy LPA04 Strategic Employment Sites

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

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

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

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

Policy LPA04.1: Strategic Employment Sites

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

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

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

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

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

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

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

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

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

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

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

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

Policy LPA05.1: Strategic Housing Sites

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

Policy LPA06: Safeguarded Land

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

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

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

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

Policy LPA07: Transport and Travel

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

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

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

8 If your representation is seeking a modification the oral part of the examination? (the hearings in	n; do y L public	ou consider it)	necessary to	participate at
No, I do not wish to participate at the				
oral examination				

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

Please keep a copy for future reference.

RO1497



Representation re:- planning to build on green belt area in clockface /bold

Karyn Richmond to: planningpolicy@sthelens.gov.uk 13/03/2019 15:21

From: Karyn Richmond

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.

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

Ref: LPSD

1 1 MAR 2019

(For official use only)

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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable) ALSO UN BEHALF OF
	Title: MCS
11. 11. 11. 11. 11. 11. 11. 11. 11. 11.	First name: JoAA
	Last Name: DAGNALL
	Organisation/company:
Address: 100, BEECH GARDENS	Address: 14, OLD LANE,
	RAINFORD
	ST. HELENS
	Postcode: WAII 8JE
Signature:	Date: 8/3/19
olgitataro.	
Please be aware that anonymous forms canno considered you MUST include your details ab	ot be accepted and that in order for your comments to be ove.
	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
✓ Yes (via email)	□ No
Please note - email is the Council's preferred	

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Policy	LPA02 LPA05	Paragraph/diagram table 4.6-8 - 4 Table 4.	Carl Annual I	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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Sound?				Yes	No		
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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.

RO1499





13 MAR 2019

Ref: LPSD

(For official use only)

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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: D~.	Title:
First Name:	First name:
Last Name: BOLTON RIDYARD	Last Name:
Organisation/company: Desident	Organisation/company:
Address: 9, The Meadows, RAINHILL, PRESCOT.	Address:
RAINHILL, TRESCOT.	
Postcode: L35 of Q	Postcode:
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Signature:		Date:	10	13/1	0/4	;
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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 update Plan 2020-2035? (namely submiss Inspector's recommendations and a	d of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan)
Yes ☑ (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. If no e-mail you by your postal address.

RETURN DETAILS

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

post to:

Local Plan

St.Helens Council

Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP

or by hand delivery to:

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

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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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.

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.

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 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.

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.

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i. Printed Name MR. GEOFFREY DRACO

Address
Signature

Date /0/3/2019

2. Printed name STAVIA DRACO

Address

L350PP

Signature

Date 10/3/2019

3. Printed Name Mrs Jemiser Turner

10/3/19

Address

Signature

Date

10/3/19

4. Printed Name Christopher Tune

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Signature

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1013119

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Local plan 2018 HA16 now 8HS Kathryn Rigby to: planningpolicy 13/03/2019 12:38



----- Forwarded message -----

From: **Kathryn Rigby**

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 Lancs, 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

Date: Wed, 13 Mar 2019, 12:38

Subject: Local plan 2018 HA16 now 8HS To: clanningpolicy@sthelens.gov.uk

Forwarded mes	sage
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